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TÜRKİYE IN THE INTERNATIONAL CLIMATE CHANGE REGIME

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Following the Industrial Revolution, the accumulation of greenhouse gasses in the atmosphere resulted in the gradual warming of our planet and the climate slowly began to change. Tackling anthropogenic climate change became urgent as our planet reaches the point of no-return and the devastating impacts of climate change can be seen everywhere in the world already.

The global climate regime brings countries together to fight climate change and there are several mechanisms that govern the regime. The United Nations Framework Convention on Climate Change, Kyoto Protocol, Copenhagen Accord and the Paris Agreement are the key mechanisms that define the norms and govern the global regime.

Türkiye is one of the countries most affected by climate change. The temperature in Türkiye is getting warmer, precipitation patterns are changing, and extreme weather events are increasing in both quantity and severity. Türkiye has been a part of the global climate change regime for decades and has developed various policy documents, strategies and action plans.

Türkiye-EU relations are one of the driving forces behind Turkish climate change policy as the EU affects climate change policymaking in third countries through a range of mechanisms. Since Türkiye is both an accession country and has a Customs Union with the EU, it is one of the non-EU countries most affected by EU climate policies. This influence is evident in several climate change strategies developed by Türkiye.

It is widely recognised that Türkiye's climate action has become increasingly ambitious over the years; however, there remains a need for more ambitious policies. The outcomes of these strategies and action plans must be measurable and effectively monitored to ensure progress. Türkiye also needs to capitalise on its renewable energy potential, which would help reduce emissions in the energy sector, the largest contributor to emissions. This approach would not only address environmental concerns but also enhance the country's competitiveness.

Anthropogenic Climate Change

Following the Industrial Revolution, greenhouse gas (GHG) emissions increased rapidly. As a result, the human-made -also known as anthropogenic- climate change started to take effect. Anthropogenic and natural climate change are two distinct phenomena. Changes in the Earth's temperature (whether warming or cooling) can be caused by both natural and human-made factors. Large-scale volcanic eruptions cause GHG emissions and cover the earth's stratosphere with ash, leading to sunlight getting blocked and extreme levels of global cooling. Large-scale climatic changes caused by volcanoes took place many years ago. However, what is currently unfolding is human-made climate change. The Industrial Revolution that began in the 1800s led to an increase in the burning of fossil fuels to power the industrial transformation on a global scale and the world's

economy still largely relies on fossil fuels. Additionally, activities such as deforestation and agricultural production generate GHG emissions.

GHG emissions trap heat from the sun and increase the temperature of our planet, causing the Earth to get warmer gradually. However, a changing climate does not only mean the globe is continuously warming. This change in Earth's climate causes extreme weather events to occur more frequently and become more severe, the melting of the polar ice caps, a reduction in biodiversity, population displacement and food insecurity among many other effects. In short, when the climate changes, everything related to life on Earth gradually becomes off-balance.

Climate change mitigation can reverse this trend. Reducing the GHG emissions and capturing emissions are the main ways to fight climate change. To achieve this goal, various strategies can be implemented. One example is the green growth approach, which holds that economies can continue to grow while minimising their impact on climate change. Conversely, some argue that the global economic system must change drastically to reduce emissions before it's too late.

The international climate regime is where all the efforts to fight climate change culminate and turn into large-scale meaningful action. However, the regime has its challenges. Perhaps the most important challenge to tackling GHG emissions globally is allocating responsibility for emissions. It is not agreed upon whether the historically most polluters, the recent most polluters, the income groups who release the most emissions or the large companies should contribute the most. The international climate regime tries to find a solution to such problems to be able to move forward in the fight against climate change.

While the climate changes in unprecedented rates, international efforts fail to keep up. Although the countries have been taking decisive steps, they need to step up their efforts. UNEP's (United Nations Environment Programme) annual emissions gap report paints a bleak picture. The report for the year 2024 establishes that if countries' current NDCs are not updated, our planet will face a 2.6-degree Celsius warming in the best-case scenario. This scenario exceeds both the 1.5- and 2-degrees Celsius limits and makes it more likely that the world will reach a point of no return. If the current national climate change policies are applied, the warming will reach 3.1 degrees Celsius, which will lead to significantly devastating effects.[1] This urgency is what makes it important to understand how the global climate change regime works.

[1] United Nations Environment Programme et al., "Emissions Gap Report 2024: No More Hot Air … Please! With a Massive Gap between Rhetoric and Reality, Countries Draft New Climate Commitments", *United Nations Environment Programme*, 24.10.2024, https://www.unep.org/resources/emissions-gap-report2024, Accessed on 22.01.2025.

The International Climate Change Regime

International regimes are defined as "a set of implicit or explicit principles, norms, rules, and decision-making procedures around which actors' expectations converge".[2] In simpler terms, an international regime is a set of rules that help govern an issue area in the global scale. The increasing awareness of environmental problems and the following surge in environmental movements resulted in the emergence of the global climate regime towards the end of 1980s.[3] Publication of the Brundtland Commission Report named "Our Common Future" drew attention to the effects of climate change.[4] The United Nations Framework Convention on Climate Change (UNFCCC) was opened for signature in 1992 United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro.[5]

Currently, several mechanisms and agreements govern the international climate change regime. The UNFCCC, Kyoto Protocol, the Copenhagen Accord, The Intergovernmental Panel on Climate Change (IPCC), the Durban Platform for Enhanced Action and Paris Agreement are all parts that make up the current international climate change regime. The rules and norms agreed upon in these mechanisms and agreements define the characteristics of the international climate regime.

United Nations Framework Convention on Climate Change

The UNFCCC was opened to signature in Rio Earth Summit in 1992 and it took effect in 1994. Although there was limited scientific consensus on anthropogenic climate change, the UNFCCC is significant in the sense that the Convention recognised and identified the problem. The UNFCCC recognises the need to set a limit on GHG emissions within a specific timeframe to allow the environment to adapt to climate change, support sustainable economic growth, and ensure food security. Industrialised countries are expected to contribute the most to emissions reductions, as set out in the Kyoto Protocol. Developing countries are provided with funds to finance their climate change efforts through a system of loans and grants from developed nations. Both developing and developed countries report on their progress to the UNFCCC, albeit according to different criteria.[6]

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[2] Stephen D. Krasner, "International Regimes", *Cornell University Press*, 1983.

[3] Daniel Bodansky, "The History of the Global Climate Change Regime", *International Relations and Global Climate Change*, vol. 23, no. 23, 2001, p. 505.

[4] Ibid.

[5] UNFCCC, "What is the United Nations Framework Convention on Climate Change?", n.d., https://unfccc.int/process-and-meetings/what-is-the-united-nations-framework-convention-on-climate-change, Accessed on 21.11.2024.

[6] Ibid.

The global climate regime has a secretariat located in Bonn, Germany, and includes many subdivisions, employing around 450 staff.[7] The secretariat is tasked with supporting the international efforts to fight climate change.[8] UNFCCC brings together the parties to the Convention to engage in important decision-making processes. These meetings are known as Conference of Parties (COP) and they provide a platform to negotiate agreements and accords, create new mechanisms for the global governance of the international climate regime, set up goals and pledges and ensure reporting and monitoring of implementation of certain provisions.

Kyoto Protocol

The Kyoto Protocol was adopted in 1997 and entered into force in 2005. The Protocol currently has 192 parties, and it helped operationalise the UNFCCC by making developed countries commit to emission reduction efforts by their pledges. Therefore, it is only legally binding for the developed countries.[9]

Kyoto Protocol established an emissions trading system and a flexible market mechanism. While countries are required to meet their targets through national policies, the Protocol also provides three market-based international mechanisms to help them meet these targets more efficiently. These mechanisms are as follows:[10]

- **International Emissions Trading:** Parties to the Kyoto Protocol have a level of allowed (or assigned) emissions over the 2008-2012 period. Emissions Trading is set out in Article 17 of the Protocol, and it allows countries to trade their spare emission allowances. This turns emissions into a commodity. Such emissions trading systems can also be found at the national level, or the EU's case, on the supranational level.[11]

- **Clean Development Mechanism (CDM):** The mechanism is set out in Article 12 of the Protocol, and it allows a developed country that pledged to reduce or limit its emissions to implement a similar project to reduce emissions in developing countries. This also counts towards a developed country's emission reduction efforts, granting them more flexibility in their commitments.[12]

[7] UNFCCC, "About the Secretariat", n.d., https://unfccc.int/about-us/about-the-secretariat, Accessed on 21.11.2024.

[8] Ibid.

[9] UNFCCC, "What is the Kyoto Protocol?", n.d., https://unfccc.int/kyoto_protocol, Accessed on 22.11.2024.

[10] Ibid.

[11] UNFCCC, "Emissions Trading", n.d., https://unfccc.int/process/the-kyoto-protocol/mechanisms/emissions-trading, Accessed on 22.11.2024.

[12] UNFCCC. "The Clean Development Mechanism", n.d., https://unfccc.int/process-and-meetings/the-kyoto-protocol/mechanisms-under-the-kyoto-protocol/the-clean-development-mechanism, Accessed on 22.11.2024.

- **Joint Implementation (JI):** This mechanism is defined in Article 6 of the Kyoto Protocol and refers to the joint implementation of emission reduction projects. More specifically, it allows parties to gain emission reduction units when they invest in a project in another nation's territory. Such projects are named "Joint Implementation Projects".[13] This mechanism also helps countries with more funds to reduce emissions by investing in another party, ensuring a smoother transition to climate neutrality.

All these mechanisms afford the Kyoto Protocol a high level of flexibility.

Kyoto Protocol established a monitoring and compliance system for transparency. Countries' emissions are monitored and tracked. The Protocol also monitors the transactions between parties while the compliance system ensures that parties are on track with their pledges and guides them.[14]

With the Doha Amendment, Kyoto Protocol sets legally binding obligations for the second commitment period for 30 parties which are: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, EU, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom of Great Britain and Northern Ireland.[15]

Doha Amendment includes:

- New commitments for parties who agreed on a second round of commitments,
- A renewed list for the GHGs to be reported by parties in the second period,
- Amendments of several articles of the Protocol on the issues concerning the first period that need to be updated for the second period.[16]

The Copenhagen Accord

The Copenhagen Accord is the outcome of COP15, organised in Copenhagen in 2009. The Accord comprises explicit emission reduction pledges by all the major economies, including China and other important developing economies. The Accord is not a legal

[13] UNFCCC, "Joint implementation", n.d., https://unfccc.int/process/the-kyoto-protocol/mechanisms/joint-implementation, Accessed on 22.11.2024.

[14] UNFCCC, "What is the Kyoto Protocol?", n.d., https://unfccc.int/kyoto_protocol, Accessed on 22.11.2024.

[15] UNFCCC, "The Doha Amendment", n.d., https://unfccc.int/process/the-kyoto-protocol/the-doha-amendment, Accessed on: 22.11.2024.

[16] UNFCCC, "What is the Kyoto Protocol?", n.d., https://unfccc.int/kyoto_protocol, Accessed on 22.11.2024.

agreement but a political one. The parties at the COP15 agreed to "take note of", at the final plenary session on 18 December 2009.[17]

The decisions adopted were parallel to the UNFCCC and the Kyoto Protocol. The core elements of the Accord are a long-term goal, mitigation, adaptation, finance, technology, forests and measurement, reporting and verification. Regarding a long-term goal, the Accord acknowledges the scientific information about the global temperature increase limits and establishes that it should be kept below 2 degrees Celsius. The Accord also envisaged a review in 2015 to strengthen the goal to include a 1.5 degrees Celsius increase limit. The developed countries were expected to pledge to implement emission reduction targets for 2020, while the developing nations will begin implementing mitigation actions. Developed countries' emission targets and funding for developing countries would be measured, reported and verified. The same would be applied to developing countries but the measuring, reporting and verification would take place through processes in their domestic legislation albeit with international consultation and evaluation. Only the actions funded by international support were subject to international measurement, reporting and verification processes.[18]

Developed countries would provide finance for the adaptation actions in the developing nations. The Accord also recognised the immediacy of establishing a financial mechanism to support emission reductions in deforestation and forest degradation. This is crucial in the sense that forests are important carbon sinks. In addition, funding for the developing countries had to be improved and from 2010 to 2012, developed countries needed to commit to set up new financial sources of nearly USD 30 billion. Developed countries pledged to jointly mobilise USD 100 billion by 2020. Technology transfer would accelerate to facilitate adaptation and mitigation.[19]

However, the Accord did not include binding commitments. This task was later exercised by the Paris Agreement, but the elements endorsed and taken note of in the Copenhagen Accord became a head start for the creation of the Paris Agreement.

The Paris Agreement

The Paris Agreement is the first legally binding international climate change agreement which has 196 parties currently. The Agreement was adopted in 2015, and it entered into force in 2016. Paris Agreement aims to keep the global temperature increase below 2 degrees Celsius compared to pre-industrial levels and commits to making the effort to keep it under 1.5 degrees Celsius. According to the IPCC, the temperature increase should be no more than 1.5 degrees Celsius as it causes severe impacts with a high likelihood of

[17] Center for Climate and Energy Solutions, "COP15 Copenhagen", n.d., https://www.c2es.org/content/cop-15-copenhagen/, Accessed on 22.11.2024.

[18] Ibid.

[19] Ibid.

no return. Therefore, the GHG emissions should peak before 2025 and decline by 43% by 2030.[20]

In every five years, the countries are expected to step up their climate ambitions. Countries have been submitting their nationally determined contribution (NDC) documents since 2020. Every NDC has to be more ambitious than the previous one to ensure continuous improvement. In the NDCs, countries set out their actions to reduce their GHGs and build resilience to adapt to climate change. In COP27, countries were assigned the responsibility to update their targets for the year 2030 and update their NDCs accordingly, to align with the 1.5-degree Celsius goal. Countries are also expected to provide specific actions for reducing their GHGs in the long term. They are expected to prepare and submit long term GHG emission development strategies (LT-LEDS). These strategies act as a pathway towards ensuring that countries meet their long-term goals. One difference between the LT-LEDS and NDCs is that the LT-LEDS is not obligatory.[21]

Climate finance has an important role in ensuring that the Paris Agreement fulfils its purpose. The Agreement encourages developed countries to step up their voluntary contributions. It also acknowledges that technological advancement and technology transfer will improve resilience and mitigation efforts. With its technology framework, it provides guidance for the Technology Mechanism of the UNFCCC. Additionally, the Agreement calls for increased support for capacity building in developing countries. The Paris Agreement established an enhanced transparency framework (ETF). Starting in 2024, countries report on their actions and progress in a transparent way. The information gathered through this framework is incorporated into the Global Stocktake, which then evaluates the collective progress of all parties towards the long-term climate goals.[22]

Alongside many countries, organisations and stakeholders, Türkiye also has an important role in the global climate regime thanks to its pledges, strategies and action plans. Türkiye has a significant degree of stake in preventing climate change as it is one of the countries most affected.

The Effects of Climate Change in Türkiye

Climate change affects countries disproportionately and Türkiye stands out as one of the most affected nations. As a country situated in the Mediterranean, Türkiye is susceptible to risks brought by the effects of climate change. The University of Notre Dame Global Adaptation Index (ND-GAIN) provides data on countries' vulnerability to climate change.

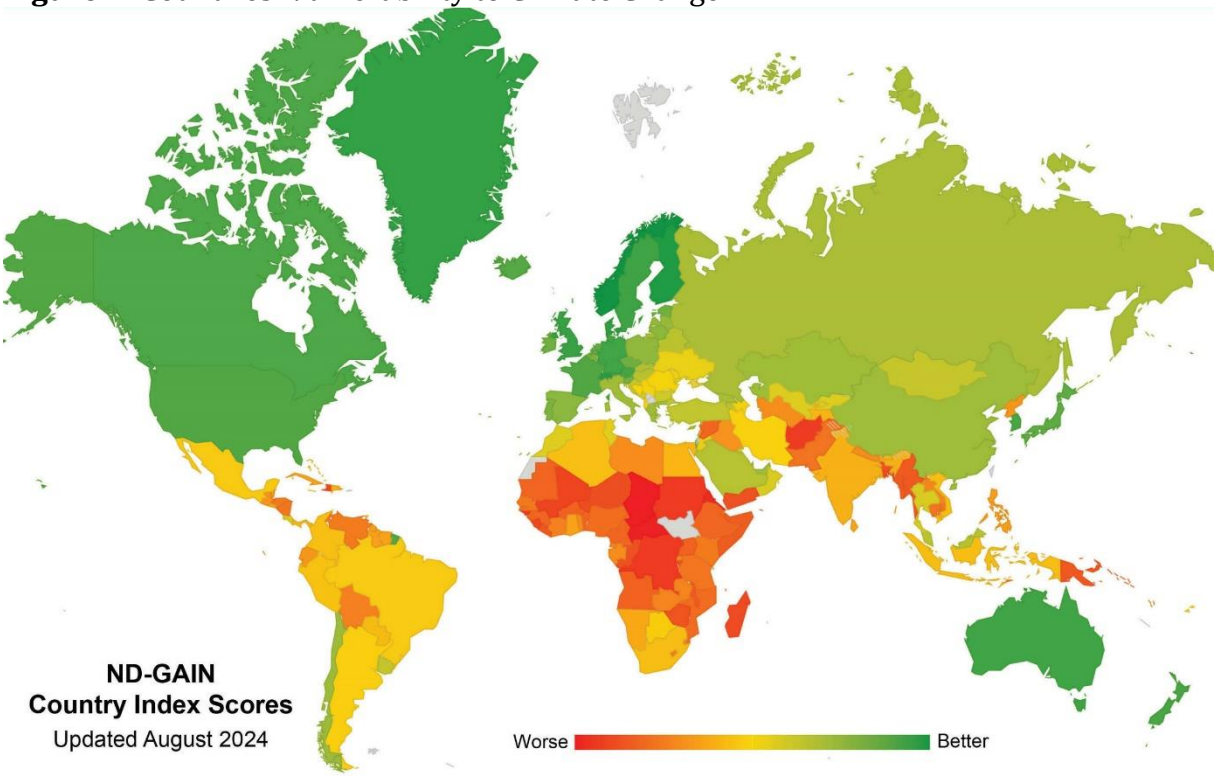
[20] UNFCCC, "The Paris Agreement", n.d., https://unfccc.int/process-and-meetings/the-paris-agreement, Accessed on 22.11.2024.

[21] Ibid.

[22] Ibid.

According to the dataset, Türkiye appears to be vulnerable to the risks brought by the climate change.[23]

Figure 1: Countries' Vulnerability to Climate Change



Source: *Notre Dame Global Adaptation Initiative Country Index (ND-GAIN)*[24]

Studies demonstrate that there is a significant degree of warming observed in Türkiye, and it is consistently increasing. Türkiye faced an increase in the number of summer days and tropical days. 50% of the record maximum air temperature was observed after the 2000s. In the last 25 years, the temperature regime in Türkiye changed drastically and the temperatures got warmer as the frequency and magnitude of heatwaves increased.[25]

Regarding precipitation patterns, the winter and spring precipitation has decreased to a significant extent. In the Aegean, Mediterranean and South-eastern Anatolian regions, there have been cases of severe drought. Annual total precipitation is also decreasing, while the type of rainfall causing floods and landslides is observed on more occasions.[26]

[23] Notre Dame Global Adaptation Initiative Country Index (ND-GAIN), *University of Notre Dame*, 2024.

[24] Ibid.

[25] Murat Türkeş, "Scientific Basis of Climate Change and Impacts on Turkey", Climate Change Training Module Series 1, 2020, https://www.iklimin.org/wp-content/uploads/2020/02/modul_01_en.pdf, Accessed on 18.12.2024.

[26]Ibid.

The country is vulnerable to risks such as droughts, floods, heatwaves, coastal erosion and wildfires.[27] Since 2018, the number of meteorological disasters has increased greatly.[28] 8,274 climate change-related meteorological disasters occurred between 2010 and 2021, and they are expected to worsen due to the adverse effects of climate change.[29] The country is disproportionately threatened by forest fires.[30] 2,793 forest fires were recorded in Türkiye, and 139,502 hectares of forests have been damaged in 2021 alone.[31]

All these changes affect many factors in Türkiye, ranging from agricultural yield to tourism due to geographic, climatic and socioeconomic conditions. Climate change continues to cause economic losses, leading to economic insecurity.[32] The rapid increase in population and the wave of migration put further stress on the natural resources in Türkiye that were already under strain. Aridity is projected to increase due to decreased precipitation and increased temperature. This will decrease crop cultivation, leading to food insecurity. Heatwaves will affect the daily life and health of the people.[33]

According to the World Bank indicators for climate risk and vulnerability, Türkiye is among the countries at the most risk. Especially regarding the transport system, food and water security, natural disasters; Türkiye is in a position of high risk.[34]

[27] "Turkey", *G20 Climate Risk Atlas*, 19.10.2021, https://www.g20climaterisks.org/turkey/ , Accessed on 08.08.2024.

[28] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change Directorate of Climate Change, "Climate Change Mitigation Strategy and Action Plan 2024-2030", n.d.

[29] Ibid.

[30] Mesude Demir, "Türkiye'nin iklim değişikliğine karşı hedefi var, icraatı yok!", *Diken*, 15.05.2024, https://www.diken.com.tr/turkiyenin-iklim-degisikligine-karsi-hedefi-var-icraati-yok/, Accessed on 08.08.2024.

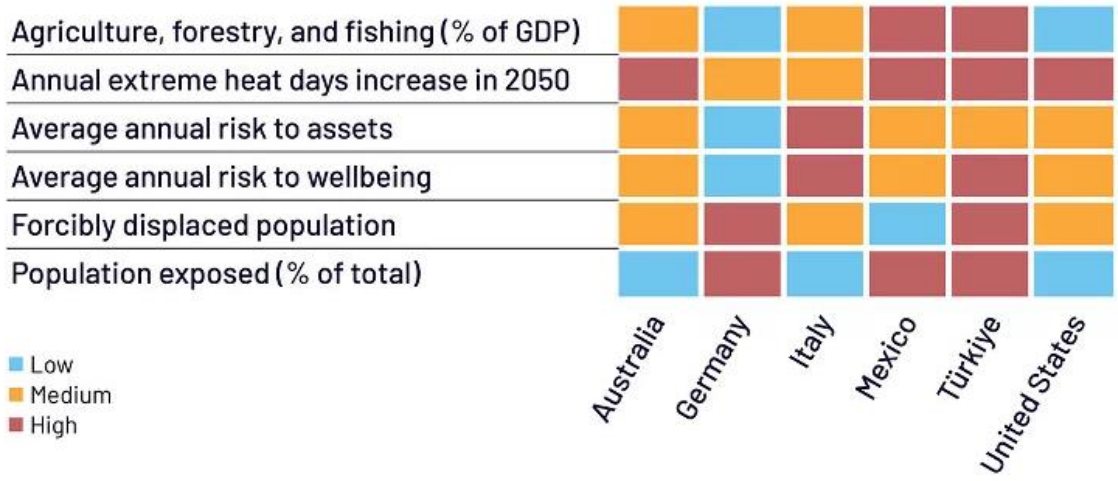
[31] Ibid.

[32] Ibid.

[33] Ömer Lütfi Şen, "A Holistic View of Climate Change and Its Impacts in Turkey", *Istanbul Policy Center*, 2013.

[34] World Bank Group, "Key Highlights: Country Climate and Development Report for Türkiye", 13.06.2022, https://www.worldbank.org/en/country/turkey/brief/key-highlights-country-climate-and-development-report-for-turkiye, Accessed on 07.01.2025.

Figure 2: Climate Risk and Vulnerability in Türkiye and Selected Countries



Source: *World Bank Group*[35]

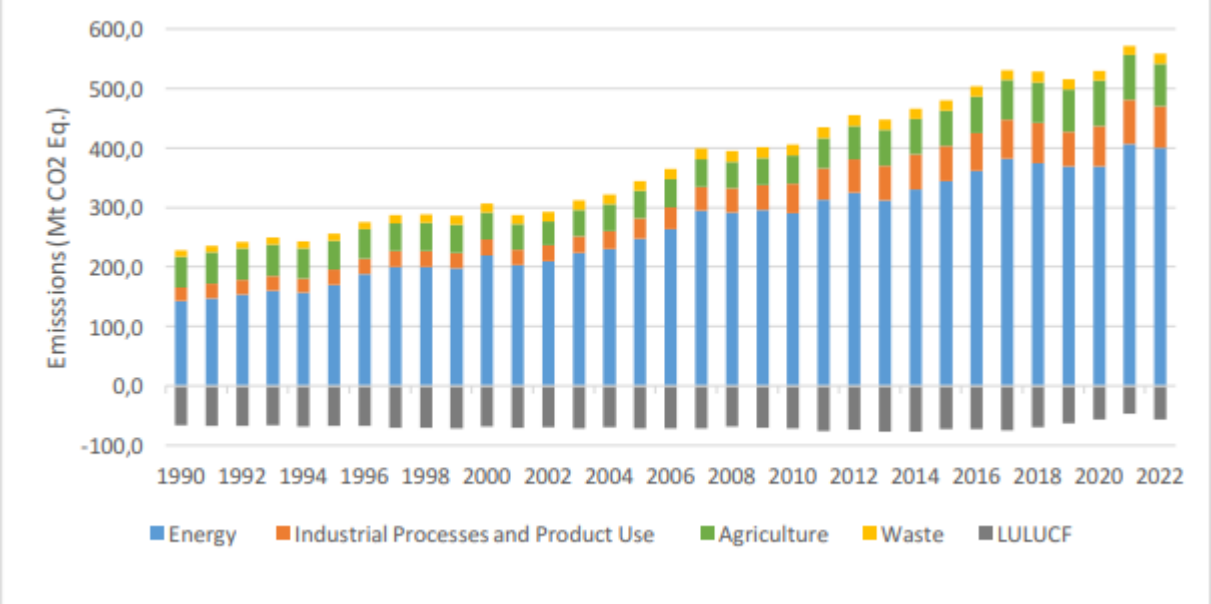
Climate change is projected to continue to affect Türkiye in the future, according to business-as-usual (BAU) scenarios. Studies demonstrate an expected annual mean temperature increase of 2,7 degrees Celsius. Precipitation is projected to continue to decrease and the variability in the trends is projected to get more volatile in time.[36]

Türkiye's overall vulnerability is one of the main reasons for the urgency of national climate action. Another crucial reason is the country's GHG emissions over the years. It is well established that Türkiye is on a path of high GHG emissions, which gives Türkiye the responsibility to take action in order to reduce its emissions. Türkiye's energy sector is the most responsible for GHG emissions, requiring urgent sectoral action.

[35] World Bank Group, "Key Highlights: Country Climate and Development Report for Türkiye", 13.06.2022, https://www.worldbank.org/en/country/turkey/brief/key-highlights-country-climate-and-development-report-for-turkiye, Accessed on 07.01.2025.

[36] G20 Climate Risk Atlas, "TURKEY", n.d., https://files.cmcc.it/g20climaterisks/Turkey.pdf, Accessed on 18.12.2024.

Figure 3: Türkiye's GHG Emissions and Removals (1990-2022)



***Source**: Ministry of Environment, Urbanization and Climate Change*[37]

Türkiye in the International Climate Change Regime

Türkiye's climate change policies date back to the 1990s. However, Türkiye's concerted efforts in global climate change policymaking began to shape in 2004 due to the ratification of the UNFCCC and accession negotiations to the EU. The diplomatic efforts around these two developments culminated in Türkiye's active participation in the regime. As it is the case today, the EU accession process requires countries to take climate change action.[38]

Türkiye's ratification of the Kyoto Protocol was delayed for several reasons. As a member of the OECD, Türkiye had the initial obligation to be included in Annex 1 and 2 of the Protocol when it was first adopted in 1992. Annex 1 required Türkiye to pledge to reduce its emissions unconditionally while Annex 2 would oblige Türkiye to provide financing and technology to developing countries. Türkiye conducted negotiations to be removed from the two annexes, claiming to be a developing country. Türkiye's request did not get accepted; therefore, the country applied to be removed only from Annex 2, claiming that it is in the first phase of industrialisation. This request was accepted and Türkiye became a party to the UNFCCC in 2004. Taking part in Annex B, Türkiye did not commit to any

[37] Ministry of Environment, Urbanization and Climate Change, "2053 Long Term Climate Strategy", 2024, https://unfccc.int/sites/default/files/resource/Turkiye_Long_Term_Climate_Strategy.pdf, Accessed on 18.12.2024.

[38] Ümit Şahin, "Türkiye'nin İklim Politikalarında Aktör Haritası", *İstanbul Politikalar Merkezi*, November 2014.

emissions reductions. Türkiye's special circumstances were acknowledged, and Türkiye was classified differently than the other Parties in Annex 1.[39]

Until the ratification of the Paris Agreement, which came relatively late, Türkiye's actions were somewhat stalled. However, with the ratification of the Agreement in 2021, Türkiye's participation in the regime became more dynamic, with many strategies and action plans enacted.

2010-2023 National Strategy on Climate Change and 2011-2023 National Climate Change Action Plan

The strategy involves a set of objectives in the short-term, mid-term and the long-term. The main objectives concerning climate action are integrating climate change into development policies, ensuring energy efficiency and increasing the use of renewables. The Strategy sets out that Türkiye aims to actively be a part of international efforts. Türkiye committed to limiting the rate of growth of GHG emissions without compromising development. However, noting Türkiye's economic and demographic development status, the Strategy does not include a GHG emission reduction commitment for a specified baseline year. The country plans to limit emissions with various measures that are also in line with sustainable development priorities. Türkiye aims to put into action all the strategies in the document, considering the principle of common but differentiated responsibilities and ensuring that these actions are not only national but also a part of international efforts.[40]

Long-term strategies were expected to produce an outcome in 10 years. In the energy sector, Türkiye aimed to increase the share of renewable energy in total energy generation by up to 30%. Additionally, GHG emissions from electricity generation would be 7% less compared to the BAU scenario by 2020. In transportation, the share of railways and seaways in passenger transportation and the use of alternative fuels would increase. Concerning industry, the strategies include a transition to cleaner production, innovation and energy efficiency. In terms of waste, more efficient waste management and increased recycling were planned. Lastly, in land use, agriculture and forestry, there are very detailed strategies, culminating in a projected enhanced monitoring, planning and a reduced urban stress on forests and rural land.[41] Overall, a concrete emissions reduction target and quantitative sectoral targets in various indicators appear to be lacking.

According to the 2010-2023 National Strategy on Climate Change, 2011-2023 National Climate Change Action Plan advances the efforts by outlining concrete steps to be taken.

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[39] N. Melis Bostanoğlu, "Where Does Turkey Stand on the International Climate Regime?", *Economic Development Foundation (IKV)*, November 2020.

[40] T.R. Ministry of Environment and Urbanization, "Republic of Turkey Climate Change Strategy 2010 2023", 2010.

[41] Ibid.

One difference between the two documents is that the Action Plan also includes the building sector and analyses agriculture and land use and forestry sectors separately.[42]

Paris Agreement and Türkiye's NDCs

Türkiye signed the Paris Agreement in 2016; however, ratification was not until 2021. In 2015, Türkiye submitted its Intended Nationally Determined Contribution (INDC). Türkiye emphasised its national circumstances, which required the country to be classified as a developing country eligible for official development assistance (ODA). The INDC plans up to 21% reduction in emissions compared to BAU scenarios by 2030. The period of implementation is 2021-2030. The INDC covers energy, industrial processes and product use, agriculture, land use, land-use change and forestry, and waste sectors.[43] In 2021, Türkiye resubmitted its INDC as an NDC following the ratification of the Paris Agreement.

Civil society can be regarded as one of the most important stakeholders in Türkiye's climate policies. NGOs specialized in the field of the environment were particularly active in advocating for more ambitious environmental and climate policies. Think tanks, including IKV, also aimed to provide input into the policy-making process in Türkiye regarding the acceleration of climate policies. In March 2021, IKV, together with TEPAV and IPM, published a call to accelerate Türkiye's green transition and adopt more ambitious emissions reduction targets.[44] The call proposed the following:

1. "Türkiye should ratify the Paris Climate Agreement, of which it was among the first signatories in 2016. This initial step is important as it demonstrates Türkiye's willingness to position itself as a serious actor in the global agenda for transitioning to a low-carbon economy.
2. The INDC submitted to the Secretariat of UNFCCC in 2015 should be updated realistically and aligned with current conditions.
3. Considering that the EU is Türkiye's most significant export market and taking into account the process of updating the Customs Union, industrial, energy, agricultural, and trade policies should be reviewed from a green transformation perspective to address the challenges posed by the Green Deal. A synchronized roadmap with the EU should be developed and followed in this transformation process."

[42] T.R. Ministry of Environment and Urbanization, "Republic of Turkey Climate Change Strategy 2010 2023", 2010.

[43] UNFCCC, "Republic of Turkey Intended Nationally Determined Contribution", 2015.

[44] IKV, IPM, TEPAV, "Türkiye Yeşil Dönüşüme Uyumda Geç Kalmamalı", March 2021, https://www.ikv.org.tr/images/files/T%C3%9CRK%C4%B0YE%20%E2%80%9CYE%C5%9E%C4%B0L%20D%C3%96N%C3%9C%C5%9E%C3%9CM%E2%80%9DE%20UYUMDA%20GE%C3%87%20KALMAMALI.pdf, Accessed on 13.03.2025.

In February 2022, IKV, together with IPM and TEPAV, made another call regarding Türkiye's phase-out from coal production and consumption. The call proposed that "Türkiye should declare its political intention, along with an action plan, without delay to completely abandon coal as an energy source in electricity production by no later than 2035".[45]

The adoption of the European Green Deal and initiatives of NGOs and other stakeholders facilitated progress in Türkiye's climate agenda. Türkiye updated its first NDC in April 2023. Türkiye pledged to reduce its emissions by 41% compared to BAU by 2030. This signifies a leap from 21% to 41% emissions reduction including the Land Use, Land-Use Change and Forestry (LULUCF) sector. The country also commits to achieving net zero by 2053. The updated first NDC is economy-wide and includes both mitigation and adaptation measures. In the document it is claimed that Türkiye predicts a peak in emissions in 2038. Meanwhile, adaptation policies are set out in these areas: agriculture and forestry, water, disaster risk management, urban sector, rural development and public health.[46]

The Green Deal Action Plan

As an EU candidate country, Türkiye takes necessary steps in line with the EU's climate change mitigation and adaptation efforts. Türkiye also has close economic ties with the EU due to the Customs Union, which creates a more integrated partnership beyond a candidate status. In particular, the Carbon Border Adjustment Mechanism (CBAM) requires companies exporting to the EU to reduce emissions associated with their production processes. Given that approximately 40% of Türkiye's total exports go to the EU, CBAM has a significant impact on the Turkish economy.

Considering the impact of the European Green Deal on the EU's climate change policies, it is important to assess how Türkiye harmonises its policies with the Green Deal regarding climate-related objectives. To respond to the need of harmonisation, on the 16th of July 2021, "Green Deal Action Plan of Türkiye" was published by the Ministry of Trade.

Through the Green Deal Action Plan, Türkiye aims to ensure compliance with the EU Green Deal in many areas, also allowing Türkiye to develop sustainably. The Action Plan addresses many policy areas related to climate change:

- CBAM,
- Green and Circular Economy,
- Green Finance,
- Clean, Affordable and Secure Energy Supply,
- Sustainable Agriculture,
- Sustainable Smart Transportation,

[45] IKV, IPM, TEPAV, "Türkiye en geç 2035'te kömürden çıkmalı", February 2022, https://www.ikv.org.tr/images/files/turkiye_en_gec_2035te_komurden_cikmali.pdf, Accessed on 13.03.2025.

[46] UNFCCC, "Republic of Türkiye Updated First Nationally Determined Contribution", 2023.

- Tackling Climate Change,
- Diplomacy,
- Information and Awareness Raising Activities.[47]

Türkiye's First Climate Council

Türkiye's first Climate Council convened in Konya in February 2022. Organised by the Ministry of Environment, Urbanization and Climate Change, the Council meetings produced valuable outcomes for the future of Turkish climate change policymaking. The meetings hosted more than 1,000 stakeholders from public institutions, academia, businesses, farmers and civil society.[48] Commission meetings took place around six thematic areas, which comprised science and technology, local governments, adaptation, GHG reduction, green financing and carbon pricing, migration, just transition and other social policies.[49]

The Council meeting produced 217 recommendations to guide Türkiye's climate action in the future. The seven main areas that the recommendations cover are adaptable cities, climate-friendly agriculture, a drought action plan, environmental and clean transportation networks, clean energy, a green economy and climate education.[50]

There are some highlights among the recommendations. The final recommendations document devotes a section that groups energy, transportation and industry together for GHG emissions reduction. The Council recommends an increase in the use of renewables, a roadmap for emissions reductions, support for efficiency improvements, a national energy efficiency vision, strategy and action plan (already published in 2023) and a strategy and roadmap for green hydrogen. In the transport sector, the Council recommends developing scenarios for future action plans, increasing the share of railways and maritime transport in cargo transport and passenger transportation, expanding the use of zero- or low-emission means of public transport, conducting smart mobility planning, developing battery and charging infrastructure and promoting the use of biofuels. Regarding the 2053 net zero ambitions for the industry section, it is recommended that projections for industry, prioritising energy-intensive sectors should

[47] "Yeşil Mutabakat Eylem Planı", *Türkiye Cumhuriyeti Ticaret Bakanlığı*, 2021, p. 9.

[48] "Turkey's Konya hosts first Climate Council; locals thrilled", *Daily Sabah*, 26.02.2022, http://dailysabah.com/turkey/turkeys-konya-hosts-first-climate-council-locals-thrilled/news, Accessed on 10.03.2025.

[49] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change, "Turkey's First Climate Council Convened in Konya", 24.02.2022, https://ab.csb.gov.tr/en/turkeys-first-climate-council-convened-in-konya-news-267433, Accessed on 10.03.2025.

[50] Türkiye Cumhuriyeti Çevre, Şehircilik ve İklim Değişikliği Bakanlığı, "İklim Şurası'nda Alınan Önemli Kararlar", 27.06.2022, https://www.csb.gov.tr/iklim-surasi-nda-alinan-onemli-kararlar-bakanlik-faaliyetleri-34154, Accessed on 10.03.2025.

be made to develop roadmaps, and Türkiye should work towards ensuring a transition to a circular economy.[51]

In the area of green financing, the Council recommends the preparation of a National Green Finance Strategy by 2023, establishing a technical expert group for the preparation of national green taxonomy legislation (work in progress) by 2023, assessing, measuring, analysing and managing climate-related financial risks, licensing inspection institutions to prevent greenwashing and ensuring institutional cooperation. Regarding carbon pricing and ETS, the Council advises Türkiye to accelerate work towards establishing a national ETS in alignment with the EU and Türkiye's climate law, conduct impact assessments for CBAM, perform impact assessments for carbon pricing to set up a price and develop a roadmap by 2025.[52]

The final recommendation document also includes GHG reductions in LULUCF, agriculture, the circular economy, adaptation, climate migration, climate justice, a just transition, health and climate education.[53]

Türkiye's 2024-2030 Climate Change Mitigation Strategy and Action Plan

Türkiye continues its efforts to tackle climate change, and the 2024-2030 Climate Change Mitigation Strategy and Action Plan (CCMSAP) is one of the most recent developments. The document was prepared by the Ministry of Environment, Urbanization, and Climate Change and launched in March 2024. The document sets out different action plans for numerous sectors:

- Energy,
- Industry,
- Buildings,
- Transport,
- Waste,
- Agriculture,
- Land Use, Land-Use Change and Forestry.

The Plan also focuses on cross-cutting issues of just transition and carbon pricing mechanisms.[54]

The strategies in the energy sector include decarbonising electricity production, aligning the energy sector with other sectors, supporting demand-side engagement, strengthening electricity infrastructure and increasing efficiency. Additionally, they address the creation of a roadmap for carbon capture, utilisation and storage to reduce unavoidable GHG

[51] T.C. Çevre, Şehircilik ve İklim Değişikliği Başkanlığı, "Komisyon Tavsiye Kararları", 25.02.2022.

[52] Ibid.

[53] Ibid.

[54] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change Directorate of Climate Change, "Climate Change Mitigation Strategy and Action Plan 2024-2030", n.d.

emissions. According to the CCMSAP, Türkiye plans to increase the installed capacity of solar, wind, hydropower, geothermal and biomass power. The country also plans to boost hydrogen use in electricity generation, develop roadmaps for these different renewable energy sectors and support R&D to decarbonise the electricity sector. The Plan also aims to boost other energy-related sectors, such as batteries and charging infrastructure. Overall, the Plan demonstrates some degree of commitment to making advancements in renewable energy and decarbonising the sector, which is crucial for reducing emissions resulting from the energy sector in numerous ways.[55]

The Plan sets out actions to ensure energy efficiency, use of renewable energy, reduce the carbon footprint and carbon intensity in manufacturing sectors. In addition, Türkiye aims to promote sustainable reporting, building capacity for stakeholders in the manufacturing sector and promoting a circular economy and resource efficiency in the industrial sector. The Plan also outlines actions to develop new technology through R&D and innovation while relying on national resources, supporting sustainable investment and creating sources of finance. The Plan's objectives in the buildings sector include improving the energy efficiency of both existing and new buildings, as well as the energy efficiency in using electrical appliances, equipment and devices in the buildings sector. Additionally, the Plan aims to promote district heating and cooling, the use of eco-friendly materials and digitally transform the construction sector through various digital tools.[56]

The Plan envisages matching demand with different means of transport to optimize transportation and curb emissions. In addition, Türkiye aims to increase efficiency in the transport sector and source more fuels from clean energy sources. Therefore, a transition to more energy- and emission-efficient transport, such as railways and maritime transport, from the road or air transport is planned. Additional goals in the transport sector include promoting public transport and increasing its efficiency, improving the efficiency of private and shared transportation, promoting the use of less carbon-intensive vehicles, and enhancing the efficiency of cargo transport.[57]

The Plan aims to prevent and reduce waste and wastewater generation, improve waste recycling and recovery rates, reduce the amount of untreated waste deposited in sanitary landfills, improve wastewater management and treatment infrastructure, develop human resources and social awareness as part of zero waste practices and reducing GHG emissions, develop financing mechanisms to improve waste management by the circular economy and emission reduction, increase R&D activities to develop technological infrastructure for improving waste management, increase the use of waste as raw material in production processes and reduce GHG emissions from waste-handling equipment and vehicles. The Plan aims to harmonise national waste and wastewater management legislation, taking emissions into account. Regarding the agricultural sector, the Plan lays out strategies and actions to mitigate methane emissions from livestock breeding, increase efficiency in the use of chemical fertilisers, provide farmers with access

[55] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change Directorate of Climate Change, "Climate Change Mitigation Strategy and Action Plan 2024-2030", n.d.

[56] Ibid.

[57] Ibid.

to affordable financing, promote training, awareness-raising and capacity-building activities for stakeholders in the agricultural sector while considering gender balance.[58]

Increasing GHG sequestration annually by protecting and managing ecosystems, increasing sink areas, reducing ecosystem-based emissions, ensuring transition in this sector to a circular bioeconomy, supporting R&D and innovation, building skills and developing technology infrastructure in the sector are the strategies laid out in the CCMSAP. The Plan aims to implement all these policies with consideration of the just transition aspect. The importance of a just transition lies in ensuring that, when transforming the economy to a green and net-zero one, no one is left behind. Therefore, the Plan includes strategies to build capacity for just transition and employment transformation. Additionally, Türkiye aims to establish an Emission Trading System (ETS) and has outlined measures in other important documents. However, with this Plan, Türkiye reaffirms its commitment to establishing an ETS that aligns with EU environmental policy and the EU ETS.[59]

Türkiye's 2024-2030 Climate Change Adaptation Strategy and Action Plan

The Plan aims to make Türkiye more resilient and prepared for the effects of climate change. Strategies and action plans include 11 sectors: urban, water, resources management, agriculture and food security, biodiversity and ecosystem services, public health, energy, industry, tourism and cultural heritage, transport and communication, social development and disaster risk reduction. Additionally, the Plan covers cross-cutting issues including technological capacity building.[60]

The Plan includes 40 goals and 132 actions in 11 sectors and cross-cutting issues. The key goals are as follows:

- Classifying and transforming buildings that are at risk of flooding,
- Increasing the rate of reuse in treated wastewater by up to 15% by 2030 and increasing the quantity of treated wastewater,
- Updating agricultural policies to achieve climate resilience, digital transformation and alignment of basin product patterns and water budgets,
- Participating in the global efforts to ensure the share of marine and land protected areas is 30%,
- Setting up a system to identify indicators and health impact chains,
- Identifying risks in the energy sector strengthening production, transmission, distribution, and storage infrastructure to enhance climate change adaptation,
- Establishing guides to identify and manage risks to cultural heritage elements,
- Identifying facilities under possible risk of industrial accidents and planning priority adaptation actions,

[58] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change Directorate of Climate Change, "Climate Change Mitigation Strategy and Action Plan 2024-2030", n.d.

[59] Ibid.

[60] Ibid.

- Including social development in 2053 long-term climate change strategy,
- Prioritising resilience-building investments in critical sectors,
- Drafting Local Climate Change Action Plans (LCCAP) for all 81 provinces.[61]

One important aspect of the Plan is that it plans to draft sectoral action plans, which will facilitate industrial adaptation to climate change to a great extent. The Plan also aims to contribute to the global goal on adaptation, under the negotiation of the Paris Agreement.[62]

2053 Long-Term Climate Strategy

Türkiye's 2053 Long-Term Climate Strategy was submitted to the UNFCCC and announced in COP29, which was held in November 2024. Türkiye's 2053 Long-Term Climate Strategy establishes strategies for Türkiye to achieve its goal of net zero by 2053. It comprises 35 strategies in 7 sectors in the mitigation section and 38 strategies in 11 sectors in the adaptation section. 16 additional strategies cover technology, just transition, climate finance and capacity building.[63]

Although there are many strategies included in the document, some of them appear to be at the forefront. To ensure Türkiye achieves its net zero goal timely, in the energy sector by 2030, the Strategy aims to reduce energy consumption, increase the installed capacity of nuclear energy, electrolyser and battery, reduce energy intensity, increase capacity of solar and wind energy and increase the share of renewable energy. The Strategy plans emission reductions in iron and steel, cement, aluminium and fertiliser sectors. Emission reduction targets in these sectors have certain thresholds based on years. The Strategy also aims to reduce hydrofluorocarbon (HFC) consumption as HFC, used mainly in cooling systems, is a synthetic gas which stays in the atmosphere for a long time.[64]

In the buildings sector, the Strategy plans that new buildings with a usable area of or more than 2000 m^2 will need to meet the Nearly Zero Energy Building standards by 2025. Energy savings in public buildings, requirement for buildings to have Energy Performance Certificate Class A rating, requirement that all new buildings to be constructed as Net Zero Operational Carbon Buildings, reduction of emissions in the buildings sector and prevention of 2 billion tonnes of carbon dioxide equivalent emissions are also part of the Strategy.

[61] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change Directorate of Climate Change, "Climate Change Mitigation Strategy and Action Plan 2024-2030", n.d.

[62] Ibid.

[63] Ministry of Environment, Urbanization and Climate Change, "2053 Long Term Climate Strategy", 2024, https://unfccc.int/sites/default/files/resource/Turkiye_Long_Term_Climate_Strategy.pdf, Accessed on 18.12.2024.

[64] Ibid.

Türkiye's Draft Green Taxonomy Directive

Türkiye's Draft Green Taxonomy Directive is modelled the EU Taxonomy Directive. Entering into force on 12 July 2020, the EU Taxonomy Regulation aims to categorise sustainable activities and defines the criteria for economic activities, in alignment with the EU's 2050 net-zero goal and the Union's general environmental goals. The taxonomy serves as a market transparency tool and directs investments toward activities that are genuinely sustainable. By clearly defining "sustainability", the taxonomy helps increase green investments, provides security for investors, prevents greenwashing, supports companies in becoming eco-friendly and helps prevent market fragmentation.[65]

The main goal of Türkiye's Green Taxonomy Directive is to support economic activities in line with the SDGs, increase investments and prevent greenwashing. The taxonomy must support net-zero emissions and Türkiye's green development ambitions. Environmental goals are defined as reducing GHG emissions, adaptation, sustainable use of water and marine resources, transition to a circular economy, preventing and controlling pollution and restoration and protection of biodiversity and ecosystems. In defining which activities are in line with sustainability and climate change objectives, the draft document lists the conditions as follows:

1. Making a significant contribution to at least one environmental goal,
2. Not causing significant harm to any other environmental goal,
3. Complying with minimum social security measures,
4. Meeting the technical screening criteria.[66]

According to the Draft Directive, corporations will have to report activities in line with the taxonomy, starting on January 1, 2027.[67]

Türkiye's Climate Law

Türkiye's first climate law was proposed to the Turkish Grand National Assembly Presidency on February 20 and approved by the Environmental Commission of the Grand National Assembly on February 26. While it has yet to be officially adopted due to remaining legislative steps, it is still important to highlight its significance.

The law serves several purposes by regulating critical areas such as the economy, cities, agriculture and the food sector to help them be minimally impacted by climate change and environmental degradation. The law will ensure the preparation of local and national

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[65] European Commission, "EU taxonomy for sustainable activities", n.d., https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities_en, Accessed on 11.03.2025.

[66] T.C. Çevre, Şehircilik ve İklim Değişikliği Bakanlığı İklim Değişikliği Başkanlığı "Türkiye Yeşil Taksonomi Yönetmeliği Taslağı", n.d.

[67] Dilge Temiz, "Türkiye yeşil aklama ile mücadelede hangi noktada?", *teyit*, 26.12.2024, https://teyit.org/dosya/turkiye-yesil-aklama-ile-mucadelede-hangi-noktada#yesil-taksonomi-yonetmeligi-nedir, Accessed on 11.03.2025.

action plans, legally guarantee cleaner and more efficient production processes, ensure preparation of a green taxonomy and operationalisation of CBAM and incorporate clean technology in the educational curricula.[68]

The main aims of the law are to fight climate change, achieve net-zero emissions and realise the green growth vision. The law covers GHG emissions reduction and adaptation while establishing a legal and institutional framework for actions, planning, tools for implementation, revenues, permits and inspections. The proposal also includes penalty provisions.[69]

According to the proposal, relevant public institutions are obliged to prepare, implement, monitor and update their planning tools, which include both mid- and long-term goals. Institutions are required to take measures aligned with the net-zero goal and circular economy principles to reduce GHG emissions and implement them while considering a just transition. They must also set up, implement and monitor zero-waste systems. Additionally, they are responsible for setting up measures to prevent the loss of carbon sinks and expand both these and protected areas. Public institutions must develop planning tools to ensure the efficient management of water resources. Efforts to minimise the impacts of climate change on biodiversity, implement measures for sustainable management of ecosystems, enhance the quality and quantity of land and marine protected areas, prevent land degradation, combat desertification and soil erosion are deemed crucial for adaptation efforts. Agricultural planning for food security is also a priority, as well as reducing the loss and damage from climate-related natural disasters. The law states that provincial climate change coordination councils will be set up and all the provinces will prepare local climate change action plans.[70]

There are various financial mechanisms in the proposal that will enable the actions set out in the law. The Directorate of Climate Change is tasked with creating mechanisms to incentivise investments for climate change mitigation. The Directorate is also tasked with establishing Türkiye's Green Taxonomy. Another possible financial mechanism included in the proposal is Türkiye's own CBAM, which will be operational in the future.[71]

The section on carbon pricing and ETS is the most extensive and the most relevant to Türkiye-EU relations. According to the proposed document, the Directorate will set up an ETS, prepare national allowance plans and distribute these allowances. It is also possible that there will be flexibility mechanisms. Businesses will have to buy carbon allowances from the Directorate, and free allowances may be granted, likely during the first phase of

[68] "Türkiye'nin İlk İklim Kanunu Geliyor", *T.C. Çevre, Şehircilik ve İklim Değişikliği Bakanlığı İklim Değişikliği Başkanlığı*, 25.02.2025, https://iklim.gov.tr/turkiyenin-ilk-iklim-kanunu-geliyor-haber-4431, Accessed on 11.03.2025.

[69] "İklim Kanunu Teklifi", Esas No 2/2927, 20.02.2025.

[70] Ibid.

[71] Ibid.

implementation. A Carbon Market Board will be created to make decisions that will directly affect the price of carbon in Türkiye's ETS, such as determining how many allowances will be on the market and establishing plans for ETS operations. The Directorate will also conduct various tasks related to ETS, including developing policies around importing and exporting international carbon credits. Non-compliant businesses will face fines of up to 5 million Turkish liras.[72]

When adopted, the law will formalise many aspects of climate change mitigation and adaptation in Türkiye. However, it is recommended that the law goes beyond a carbon market and the establishment of a national ETS, and focuses on additional efforts such as phasing out fossil fuels, particularly coal. Maintaining just transition goals, prioritising diverse stakeholder engagement during implementation, and ensuring that Türkiye clarifies and quantifies its interim goals toward the 2053 net-zero emissions target are strongly advised.

Delving into these various documents allows one to observe how the international climate change efforts of Türkiye evolved, leading to more ambitious policies and targets.

Table 1: Evolution of Türkiye's Climate Change Policy Ambitions

Policy Document	Climate Change Ambitions
2010-2023 National Strategy on Climate Change and 2011-2023 National Climate Change Action Plan	• Do not include a GHG emission reduction commitment for a baseline year, • More focused on integrating climate change policies into developmental policies, energy efficiency and increasing the use of renewables, • The Strategy comprises strategies in energy, transportation, industry, waste, LULUCF and agriculture (combined) sectors while the Plan adds building and agriculture (as a separate sector) sectors.
2015 Intended Nationally Determined Contribution (Re-submitted as Nationally Determined Contribution in 2021)	• 21% emission reduction compared to BAU by 2030, • Covers the years 2021-2030, • Covers energy, industrial processes and product use, agriculture, LULUCF, waste sectors.
2021 Green Deal Action Plan	• Aims to align Türkiye with EU Green Deal policies,

[72] Ibid.

	• Covers CBAM, green and circular economy, green finance, clean, affordable and secure energy supply, sustainable agriculture, sustainable smart transportation, tackling climate change, diplomacy, information and awareness raising.
2023 Updated First Nationally Determined Contribution	• 41% emission reduction compared to BAU by 2030, • Net zero by 2053.
2024-2030 Climate Change Mitigation and Adaptation Strategies and Action Plans	• Cover energy, industry, buildings, transport, waste, agriculture, LULUCF, just transition and carbon pricing.
2053 Long-Term Climate Strategy	• Covers energy, manufacturing, buildings, transportation, waste, agriculture, LULUCF regarding mitigation; water, transportation, vulnerability and risk, biodiversity, energy, manufacturing, tourism, agriculture, urban, health, social development and disaster risk reduction regarding adaptation, • Technology and capacity development are highlighted.

Türkiye-EU Relations in the Context of Climate Change

Perhaps the most important factor influencing Türkiye-EU climate change-related affairs is the European Green Deal. Green Deal aims to make the EU climate-neutral by 2050. Through the European Climate Law, this goal became legally binding for the Member States.[73] The Law sets additional GHG emissions reduction targets of at least 55% until 2030 compared to the 1990 levels. In February 2024, the European Commission proposed an additional goal of a 90% GHG emissions reduction by 2040 compared to 1990 levels.[74] In her speech to the EP on the 18th of July, the European Commission President Ursula von der Leyen reaffirmed the commitment to enshrine this target in the European Climate Law.[75] The EU requires that Member States submit 10-year National Energy and Climate

[73] European Commission, "Climate action and the Green Deal", n.d., https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/climate-action-and-green-deal_en, Accessed on 07.08.2024.

[74] Ibid.

[75] Directorate-General for Neighbourhood and Enlargement Negotiations, "Statement at the European Parliament Plenary by President Ursula von der Leyen, candidate for a second mandate 2024-2029", 18.07.2024, https://neighbourhood-enlargement.ec.europa.eu/news/statement-european-parliament-

Plans (NECPs), which address decarbonisation in the energy sector one of the highest sources of GHG emissions.[76] The Union also supports its international partners through the Paris Agreement[77] and actively participates in the global climate change regime.

EU in the International Climate Change Regime

EU Emissions Trading System (ETS) is one of the most crucial instruments through which the EU tackles carbon emissions across various sectors. The system covers the energy sector and manufacturing industry, also includes flights within the EU and to the UK and Switzerland.[78] This way, the system covers 40% of the EU's emissions.[79] To summarise, ETS works by putting a price on carbon emissions by creating a carbon market where businesses trade carbon emission allowances.[80] Carbon leakage occurs when EU-based companies shift their production to countries with less stringent climate regulations or when carbon-intensive imports replace products within the EU.[81] In order to prevent carbon leakage, CBAM allows the EU to impose a price on carbon emitted during the production phase of goods entering the EU Single Market.[82] The mechanism ensures that the carbon price of these imports is equal to that of domestic goods.[83] What is important about the combined EU ETS and the CBAM is that they create obligations for the third countries engaged in trade with the EU. Therefore, it requires a certain level of compliance with the emissions reduction targets that are set by the Union.

In addition to setting rules, norms and laws in the Member States, the EU influences climate policymaking in non-member countries. The effect of Green Deal is significant

plenary-president-ursula-von-der-leyen-candidate-second-mandate-2024-2024-07-18_en, Accessed on 07.08.2024.

[76] European Commission, "National energy and climate plans", n.d., https://commission.europa.eu/energy-climate-change-environment/implementation-eu-countries/energy-and-climate-governance-and-reporting/national-energy-and-climate-plans_en, Accessed on 07.08.2024.

[77] European Commission, "Climate action and the Green Deal", n.d., https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/climate-action-and-green-deal_en, Accessed on 07.08.2024.

[78] European Commission, "What is the EU ETS?", n.d., https://climate.ec.europa.eu/eu-action/eu-emissions-trading-system-eu-ets/what-eu-ets_en, Accessed on 07.08.2024.

[79] Ibid.

[80] Ibid.

[81] European Commission, "Carbon Border Adjustment Mechanism", n.d., https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism_en, Accessed on 07.08.2024.

[82] Ibid.

[83] Ibid.

even in countries where there are already ambitious environmental policies.[84] The closer a non-member country is to the EU, it is more likely to be affected by the EU environmental policy.[85] Firstly, the link between the EU climate policy and trade policy contributes the most to EU's international influence. Through CBAM, the EU requires that all the products imported into the Union reflect the price of carbon within the Union itself. This becomes an additional cost on the product in question, resulting in firms importing into the EU decreasing their emissions. The impact of CBAM on global emissions reductions is to be observed in the future; however, studies for Türkiye show that full compliance with the mechanism contributes to emissions reductions.[86]

Another way how the EU influences climate and environmental policy is EU's Free Trade Agreements (FTAs). Since 2009, the EU has considered sustainable development as one of the core elements of FTAs and includes it in the agreements. One recent example is the EU-New Zealand FTA. The EU-New Zealand FTA includes commitments to international labour and environmental standards. The parties are obliged to commit to the International Labour Organisation (ILO) and Paris Agreement fundamental principles. Regarding climate ambitions, the agreement has a dedicated provision for fossil fuel subsidy reform. Tariffs on green goods are removed, and the collaboration between the EU and New Zealand on the areas of circular economy, deforestation, carbon pricing and protection of marine habitats is promoted. Overall, the chapter on sustainability obliges both partners to strive for high levels of environmental and labour protection. The parties cannot decrease the level of environmental protection and poorly enforce these laws.[87] This agreement demonstrates that the EU transmits environmental and sustainability policies beyond the Union.

This double incentive resulting from the integration of climate policy into trade policy allows the EU to influence international climate change policymaking. Adding to these direct effects, measures that aim to make the EU more competitive such as REPowerEU and Net Zero Industry Act have a more indirect influence on climate policy in third countries. Additionally, some mechanisms require reporting and documentation from

[84] Merethe Dotterud Leiren and Fay Farstad. 'The European Green Deal and Turbulence for Non-Member States'. *Npj Climate Action*, vol. 3, no. 1, Oct. 2024.

[85] Ibid.

[86] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change, EBRD and Climate Focus, "Potential Impact of the Carbon Border Adjustment Mechanism on the Turkish Economy", March 2023, https://iklim.gov.tr/db/turkce/haberler/files/20230523%20Impacts%20of%20CBAM%20on%20Turkiye%20phase%202%20report%20FV3%20(2)-sayfalar-1,3,5-16%20(1)%20(1).pdf, Accessed on 21.01.2025.

[87] European Commission, "Factsheet: EU-New Zealand Trade Agreement - Trade and sustainable development", n.d., https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/new-zealand/eu-new-zealand-agreement/factsheet-eu-new-zealand-trade-agreement-trade-and-sustainable-development_en, Accessed on 21.01.2025.

importing operators, such as the European Deforestation Regulation and Corporate Sustainability Due Diligence.[88]

The EU also supports climate change mitigation and adaptation efforts financially in third countries. The Union contributes to the international climate finance under the Paris Agreement and is one of the biggest contributors so far. The annual global funding for developing countries was USD 100 billion before this year's COP, and in 2022 the EU and Member States contributed approximately USD 30 billion. The EU also supports developing economies through its flagship initiative Global Climate Change Alliance+ (GCCA+). With a focus on the Least Developed Countries and Small Island Developing States, GCCA+ aims to promote dialogue and cooperation between the EU and developing nations. Additionally, the European Commission committed EUR 4.03 billion to developing countries in 2022, half of the funds being devoted to climate change adaptation efforts. 35% of the EU external budget for 2021-2027 is dedicated to climate change projects in EU's neighbourhood. European Investment Bank (EIB) also contributes to climate change funding for the developing nations, with contributions reaching EUR 2.52 billion. Non-member countries are also supported through European Fund for Sustainable Development Plus (EFSD+). EFSD+ is a blend of various financial mechanisms to support sustainable development in partner countries. In addition, the EU Member States are a part of the Green Climate Fund, set up in 2010 to help developing countries with their climate change mitigation and adaptation ambitions.[89]

For accession countries, the EU has the Instrument for Pre-Accession (IPA). Through IPA, the reform efforts that will enable countries to harmonise their policies with the EU are funded in many areas, including the green agenda and sustainable connectivity. Türkiye is one of the recipient countries for IPA funds.[90]

Türkiye's EU Perspective

As an accession country, Türkiye is obliged to comply with the EU environmental policies. The progress in the 27th negotiating chapter "Environment and Climate Change" is measured annually in country reports. In the most recent report published on 30 October 2024, it is established that Türkiye has some level of preparation, while the progress is

[88] Ole Adolphsen, Jule Könneke and Felix Schenuit, "The International Dimension of European Climate Policy", 20.01.2025, https://www.swp-berlin.org/publikation/the-international-dimension-of-european-climate-policy, Accessed on 21.01.2025.

[89] European Commission, "International Climate Finance", n.d., https://climate.ec.europa.eu/eu-action/international-action-climate-change/international-climate-finance_en#european-fund-for-sustainable-development-plus-efsd, Accessed on 22.01.2025.

[90] European Commission, "Overview - Instrument for Pre-accession Assistance", n.d., https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/overview-instrument-pre-accession-assistance_en, Accessed on 22.01.2025.

limited. Regarding climate change, CCMSAP and CCASAP are welcomed, and compliance with the EU acquis on climate action (including emissions trading) is suggested.[91]

How the EU affects climate policymaking in Türkiye can be seen in policy documents. The two most prominent examples are the Green Deal Action Plan of Türkiye and CCMSAP. Through the Green Deal Action Plan, Türkiye aims to ensure compliance with the EU Green Deal in many areas. The areas covered by the Green Deal Action Plan address emissions from different sectors and underline Türkiye's commitment to international efforts and compliance with EU Green Deal legislation. Therefore, it demonstrates Türkiye's commitment to tackling the climate crisis in partnership with a valuable ally, the EU. Green Deal affects many areas, ranging from trade to agriculture. Thus, compliance with the Green Deal inevitably ensures compliance in other areas.

Regarding CCMSAP, there is a great deal of overlap between Türkiye and EU policies. Although the energy section of the document lacks specific references to the EU, there is some degree of harmony between the EU's recent energy policies, especially after the invasion of Ukraine and Türkiye's strategies laid out in the Plan. The EU places great importance on decarbonising the energy sector by promoting a switch to renewables. This strategy of ensuring the transition to clean energy is visible in the EU's and Türkiye's strategies. In addition, both Türkiye and the EU[92] plan to increase energy efficiency. The EU also acknowledges the critical role of R&D in the energy sector to accelerate the transition to renewable energy sources and enhance energy efficiency. To support these objectives, it promotes R&D through initiatives like the Accelerating Clean Energy Innovation Communication, Horizon Europe and REPowerEU.[93] It can be argued that including a separate strategy for switching to clean energy in the CCMSAP would ensure a greater degree of compliance with the EU and strengthen the efforts for climate change mitigation.

In compliance with the EU in the industry sector, the Plan refers to the EU's leadership role in mandatory sustainability reporting and touches on the EU Directive on Corporate Sustainability Reporting as a model. As a candidate country, Türkiye follows these developments closely and works towards developing sustainability standards for Türkiye. The Plan also notes that the EU made sustainability mandatory for SMEs, highlighting that a similar effort will be undertaken in Türkiye. In addition, Türkiye aims to prepare a gradual transition schedule in alignment with the EU. Türkiye also aims to draft legislation on the EU's digital product passport system, taking into account the

[91] Directorate-General for Neighbourhood and Enlargement Negotiations, "Türkiye Report 2024", 30.10.2024, https://neighbourhood-enlargement.ec.europa.eu/turkiye-report-2024_en, Accessed on 21.01.2025.

[92] European Commission, "Energy Efficiency Directive", n.d., https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficiency-targets-directive-and-rules/energy-efficiency-directive_en , Accessed on 09.09.2024.

[93] European Commission, "Energy research and innovation", n.d., https://research-and-innovation.ec.europa.eu/research-area/energy_en, Accessed on 14.08.2024.

objectives of the circular economy model.[94] Overall, renewables appear to have a more pronounced role in the decarbonisation of the industrial sector, highlighting a possible high degree of compliance with EU renewable energy goals, especially the EU Net-Zero Industry Act.[95]

In terms of improving energy efficiency in the buildings, the EU's approach to improving energy efficiency is referenced, as Türkiye will align its standards with those of the EU.[96] Regarding the improvement of energy efficiency in the use of electrical appliances, equipment and devices in the buildings, the Plan aims to simultaneously implement energy efficiency and eco-design regulations on white goods in line with EU standards.[97] Given the various references to EU regulations in this section, the Plan aims to ensure closer compliance with the EU in the buildings sector and aligns with the EU's focus on energy use efficiency.[98] However, in achieving goals related to renovation and increasing energy efficiency in buildings through new systems, the EU uses its Social Climate Fund to support vulnerable groups and ensure a smooth transition for their homes. Türkiye would also greatly benefit from addressing these structural inequalities, which would facilitate a smoother transition in the buildings sector.

The EU has numerous strategies to cut emissions from cars and vans, eventually leading to net-zero emissions from new cars and vans by 2035, with the final goal of road transport reaching zero emissions by 2050. Additionally, switching to clean sources of energy in the transport sector is a key objective of the EU. Furthermore, emissions trading will be introduced in road transport from 2027 onwards, as it is already the case in the aviation and maritime sectors.[99] Although the new strategies do not reference the EU, they align with what the EU aims to achieve in the transport sector. The most significant overlap appears to be the use of cleaner energy in the transport sector. Türkiye differs by prioritising a modal shift to railways and maritime transport and focusing on efficiency. However, there is still room for Türkiye to achieve greater compliance with EU efforts to curb emissions in the transport sector.

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[94] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change Directorate of Climate Change, "Climate Change Mitigation Strategy and Action Plan 2024-2030", n.d.

[95] European Commission, "The Net-Zero Industry Act: Accelerating the transition to climate neutrality", n.d., https://single-market-economy.ec.europa.eu/industry/sustainability/net-zero-industry-act_en, Accessed on 09.09.2024.

[96] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change Directorate of Climate Change, "Climate Change Mitigation Strategy and Action Plan 2024-2030", n.d.

[97] Ibid.

[98] European Commission, "Delivering the European Green Deal", n.d., https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/delivering-european-green-deal_en#making-transport-sustainable-for-all, Accessed on 08.09.2024.

[99] Ibid.

A roadmap will be developed to align with the EU Circular Economy Action Plan and increase the use of waste as raw material in production processes.[100] The circular economy is at the heart of EU waste policy. The Green Deal aims to ensure the Union's growth by facilitating a transition to resource efficiency. Therefore, transitioning to a circular economy model is crucial. The main objectives of EU waste policy are to improve waste management, stimulate innovation in recycling and limit landfilling. Therefore, Türkiye, with its focus on a circular economy model that resembles the EU's, aligns with EU waste plans in this area.[101]

The EU's biodiversity strategy under the Green Deal is one of the main developments in LULUCF. Biodiversity Strategy for 2030 aims to restore the EU's degraded lands and protect its biodiversity by 2030.[102] Under the Nature Restoration Law, the EU plans to restore all ecosystems that require restoration by 2050.[103] According to the Plan, Türkiye aims to harmonise its legislation in this area to align with both international efforts and the EU Biodiversity Strategy, planning to increase the share of land and marine protected areas to 30%.[104] This way, Türkiye aims to comply with the EU in this regard.

The Plan stresses the importance EU Green Deal in guiding Türkiye's just transition policies,[105] demonstrating efforts to ensure greater harmony in just transition. Türkiye's efforts in this area began with the Green Deal Action Plan, and the continuation of these efforts is planned with the CCMSAP.

Türkiye aims to establish an Emission Trading System (ETS) and has outlined measures in other important documents. However, with this Plan, Türkiye reaffirms its commitment to establishing an ETS that aligns with EU environmental policy and the EU ETS. In accordance with the EU ETS, Türkiye plans to expand the scope of its ETS to various other sectors. Additionally, Türkiye aims to consider the EU CBAM when designing its ETS.[106]

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[100] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change Directorate of Climate Change, "Climate Change Mitigation Strategy and Action Plan 2024-2030", n.d.

[101] European Commission, "Waste and recycling", n.d., https://environment.ec.europa.eu/topics/waste-and-recycling_en , Accessed on 08.09.2024.

[102] European Commission, "Biodiversity strategy for 2030", n.d., https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en, Accessed on 08.09.2024.

[103] European Commission, "Nature Restoration Law", n.d., https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law_en, Accessed on 09.09.2024.

[104] Republic of Türkiye Ministry of Environment, Urbanization and Climate Change Directorate of Climate Change, "Climate Change Mitigation Strategy and Action Plan 2024-2030", n.d.

[105] Ibid.

[106] Ibid.

Overall, both the Green Deal Action Plan and CCMSAP demonstrate Türkiye's efforts to harmonise with the EU climate policy and highlight the influence of the EU in Turkish climate policymaking.

Conclusion and Further Remarks

Every aspect of our daily lives and our environment is faced with the increasing impacts of climate change. The extreme weather events claim lives, droughts lead to food shortages and people are forced to migrate due to their houses being destroyed by hurricanes. Climate change puts a strain on how our world operates, and it creates the urgency to respond to and mitigate climate change.

The global climate change regime brings together countries under the Convention to fight climate change and adapt to its effects. The main mechanisms that govern the global climate regime are the UNFCCC, Kyoto Protocol, Copenhagen Accord and the Paris Agreement. Although there are serious challenges for the regime, the countries are accountable to the people they govern. Delaying national climate action will have irreversible effects. Therefore, it is of utmost importance that countries work together in stepping up their efforts to fight climate change.

Apart from the fact that Türkiye is obliged to harmonise its climate change and environmental policies with the EU, EU's norm and policy disseminating role also has an effect on Türkiye's climate change policies, as both the Green Deal Action Plan of Türkiye and the CCMSAP demonstrate.

Türkiye increasingly engages in more efforts to fight climate change. However, as nearly all world countries do, Türkiye needs to take more ambitious actions to fulfil its climate targets. Strategies and action plans are valuable starting points for ambitious climate action; however, they need to produce measurable outcomes. Türkiye's emissions need to decrease rapidly, and the country needs to step up its pledges accordingly. Türkiye has much potential to reduce its emissions. Fossil fuels, especially coal, are more expensive than wind or solar power, and the costs of these renewables continue to decrease. Solar power installation costs decreased by 90% in the last 20 years.[107] In the long-term, a swift transition to clean energy sources will enable Türkiye to avoid high energy prices and maintain its economic competitiveness. Transitioning from a fossil fuel importer to a country leveraging its renewable energy capacity will ensure Türkiye's energy security and help keep energy prices manageable. Therefore, using such a capacity and turning it into an opportunity, decreasing emissions rapidly, effective implementation of policies and ensuring a well-established monitoring and enforcement mechanism will allow Türkiye to reach its emissions reduction targets.

[107] Mesude Demir, "Türkiye'nin iklim değişikliğine karşı hedefi var, icraatı yok!", *Diken*, 15.05.2024, https://www.diken.com.tr/turkiyenin-iklim-degisikligine-karsi-hedefi-var-icraati-yok/, Accessed on 08.08.2024.