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COMMISSION STAFF WORKING DOCUMENT

**Assessment of the sustainability of plastic waste exports to OECD countries pursuant to
Article 45(5) of Regulation 2024/1157 on shipments of waste**

INTRODUCTION

Article 45 of Regulation (EU) 2024/1157 of the European Parliament and of the Council of 11 April 2024 on shipments of waste (“Waste Shipment Regulation”, “WSR”) contains provisions tasking the Commission to monitor the exports of waste from the EU to countries to which the OECD Decision¹ applies. Article 45(1) of the WSR provides that the Commission shall monitor such exports to ensure that they do not lead to significant damage to environment or human health in the country of destination or that waste imported from the Union is not shipped onwards to third countries.

In particular, **Article 45(5) requires the Commission to exercise specific scrutiny with regard to the export of plastic waste and to assess, by 21 May 2026, whether OECD countries that import significant volumes of plastic waste from the EU comply with Article 45 and thus ensure that the plastic waste is managed in an environmentally sound manner not leading to significant damage to environment or human health in their country.**

The purpose of this Staff Working Document is to provide an assessment of the plastic waste management in OECD countries importing large volume of such waste.

The EU generates around 40 million tonnes of plastic waste annually². In general, the treatment of plastic waste poses serious environmental challenges worldwide: its collection rate remains low, resulting in important volumes leaking into the environment where, due to its slow degradation, the waste generates long term impacts. Moreover, the recycling rate of such waste remains low. In the EU, it is estimated to reach 20%, while the rest is either incinerated or landfilled. The mismanagement of plastic waste is one of the most serious forms of environmental pollution worldwide, with an important transboundary nature as illustrated by the magnitude of marine pollution linked to plastic leakages from different sources.

One important objective of the WSR is to avoid that the export of waste generates environmental damages in third countries. The WSR prohibits the export of plastic waste to non-OECD countries from 21 November 2026, and this might lead to a shift of export flows of EU waste to OECD countries. This is one of the reasons why the WSR requires that the Commission should exercise specific scrutiny of the export of plastic waste to OECD countries.

According to trade data collected and provided by Eurostat³, **in recent years, the EU has been exporting between 1 and 1.5 million tonnes of plastic waste annually to third countries.** In 2025, the overall export of plastic waste from the EU to third countries amounted to 1.4 million tonnes. Out of this, the EU exported 730.000 tonnes of plastic waste to third countries located in the OECD. **Türkiye is the first destination for exports of plastic waste from the EU with 510 000 tonnes imported in 2025; this represents 36% of all export of plastic waste from the EU to third countries, and 70% of plastic waste exported to OECD countries.** The second destination country in the OECD was the United Kingdom, to which 107 000 tonnes plastic waste was exported (representing 8% of all export and a bit less than 15% of export to OECD countries), followed by Switzerland (83 000 tonnes, or 6% of all export and

¹ <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0266>

² Study by the European Commission Joint Research Centre: “Plastics materials flows in the EU-27 and their environmental impacts - Unveiling the European plastic value chain, Publications Office of the European Union, Luxembourg, 2025, <https://data.europa.eu/doi/10.2760/6579757> , JRC142860”.

³ <https://ec.europa.eu/eurostat/comext/newxtweb/>

11% of export to OECD countries). The export of plastic waste from the EU to the latter two countries amounts to less than a half of what is exported to Türkiye, showing that Türkiye is by far the largest destination for plastic waste exported from the EU.

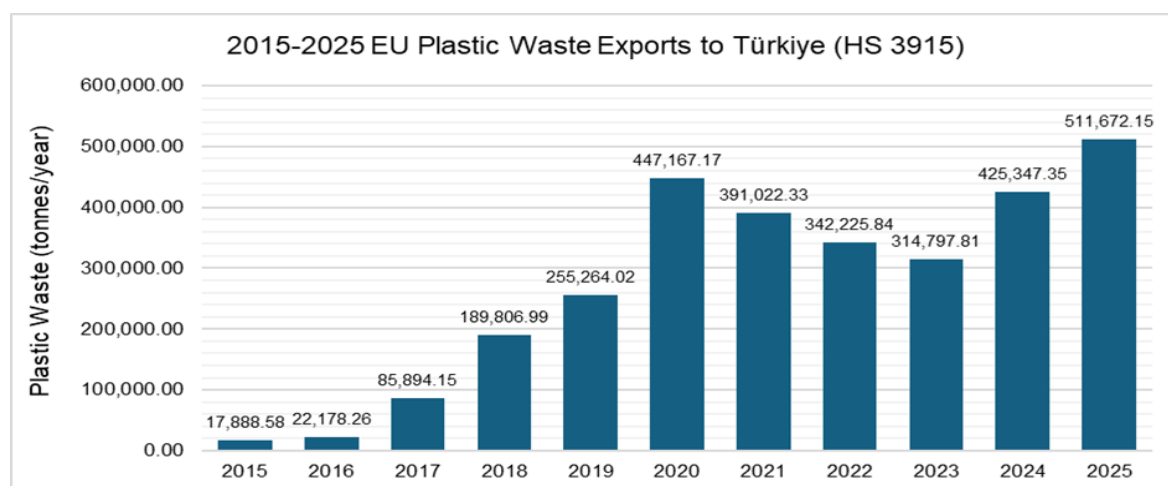
In line with the WSR, which provides that the Commission should exercise specific scrutiny towards countries which “import significant volumes of plastic waste from the EU”, this document focuses on the import of plastic waste and its management in Türkiye.

In addition to this specific assessment, the Commission will continue to exercise scrutiny on the export of waste to other OECD countries as part of its duty under Article 45 of the WSR.

OVERVIEW OF TÜRKİYE’S ROLE AS A MAJOR IMPORTER OF PLASTIC WASTE FROM THE EU AND PLASTIC PRODUCER AND THE APPLICABLE LEGAL FRAMEWORK

Since 2018, Türkiye has emerged as the leading destination for European plastic waste exports. This shift followed China’s policy which banned plastic waste imports from 2018, leading to changes in global waste trade flows. European exporters turned to alternative markets, and in particular to Türkiye, due to its proximity, its important plastic industry, and the fact that other destination countries in South-East Asia adopted stricter measures on the import of plastic waste into their territory. In 2025, the export of plastic waste from the EU to Türkiye reached its highest level in volume (more than 500 000 tonnes, as shown in figure 1 below), for a value of EUR 94 million. Türkiye also receives important volumes of plastic waste from non-EU countries, especially the United Kingdom. In total, Türkiye imported almost 700 000 tonnes of plastic waste from third countries in 2025.

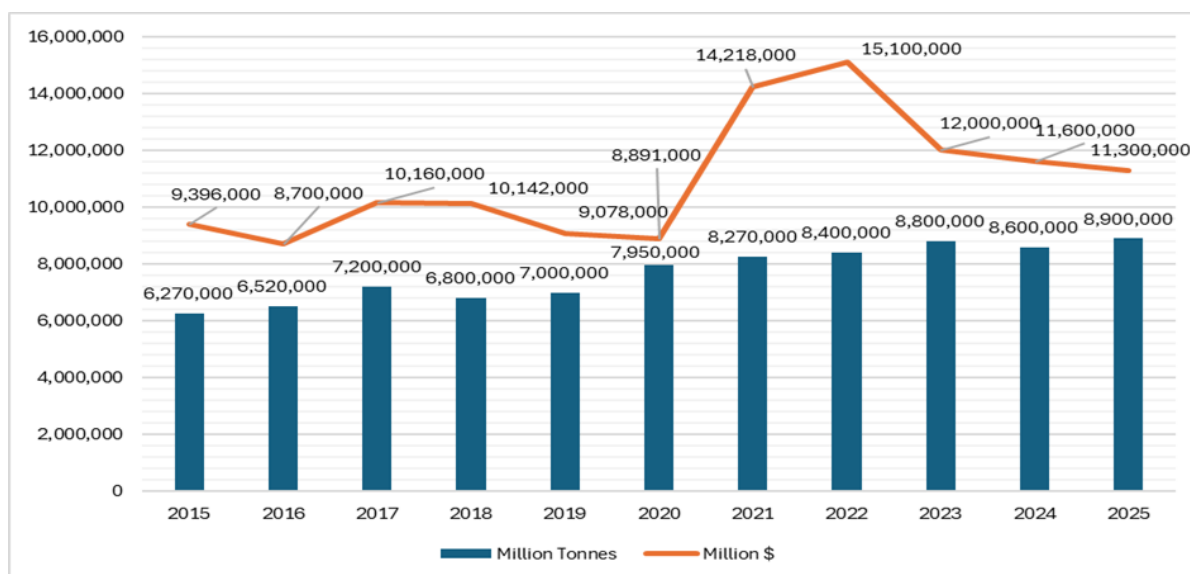
Figure 1: 2015-2025 EU Plastic Waste Exports to Türkiye (HS code 3915)



Plastic waste is imported to be recycled into new plastic products by the Turkish plastic recycling and manufacturing industry. It is used as a feedstock, complementing plastic raw material, a large share of which is also imported.

As shown in Figure 2, within the period 2015 – 2025, the imports of plastic raw material progressively increased, reaching a peak of 8.9 million tonnes in 2025.

Figure 2: 2015-2025 Plastic Raw Material Imports HS Codes 3901 – 3915



Over the last decade, Türkiye’s production of plastic products has expanded rapidly, reaching 10 million tonnes in 2025. This production relies predominantly on imported feedstock (both virgin plastics and plastic waste), as the domestic production of primary polymers only covers a minority of the feedstock needs.

Legal framework for the management and import of plastic waste

In the past decade, Türkiye has significantly strengthened its legal and policy framework for plastic waste management. Overall, the measures adopted and presented in this section aim to closely align with international conventions and European Union law, reflecting the country’s commitment to transitioning towards a circular economy.

Legal framework related to the management of plastic waste

The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal controls the movement of non-hazardous plastic waste since an amendment to its Annexes in 2019, covering mixed and hard-to-recycle plastic waste. Türkiye is a Party to the Basel Convention and has been complying with its obligations under that Convention, notably in terms of reporting. It has implemented the amendments on plastic waste adopted under the Basel Convention in 2019, albeit with almost a two years’ delay compared to the entry into application of the amendments under the Convention. Türkiye is also a Member of the OECD, which has adopted various instruments relevant for the management and shipment of plastic waste.

At national level, the legal foundation for plastic waste management is the Constitution of the Republic of Türkiye (1982), which enshrines environmental protection as a constitutional right. Article 56 guarantees every individual “the right to live in a healthy and balanced environment” and imposes a dual obligation on both the State and citizens to improve the environment and prevent pollution. This constitutional provision serves as the normative basis for all subsequent environmental legislation, including waste and plastics regulation.

Environmental Law No. 2872⁴

Building on the constitutional mandate, Environmental Law No. 2872 establishes the primary framework for environmental governance in Türkiye. It sets out general principles for pollution prevention, resource conservation, and administrative sanctions, while granting authority to issue secondary regulations for specific waste streams.

Waste Management Regulation⁵ and associated Regulations

The *Waste Management Regulation*, which entered into force on 2 April 2015, is one of the main instruments underpinning Türkiye's plastic waste management regime. Adopted under the authority of Environmental Law No. 2872, this regulation provides the operational backbone for all waste streams, including plastics. It also serves as the legal foundation for subsequent plastic-specific measures, such as the Packaging Waste Control Regulation (2021) and the Zero Waste Regulation (2019).

The Waste Management Regulation establishes detailed requirements applicable to waste generation, separate collection, transport, recovery, and disposal, and introduces obligations for municipalities, waste producers, and licensed operators. Specifically, it introduces Extended Producer Responsibility (EPR) for certain product categories, including packaging which is the primary source of plastic waste⁶. Recyclable packaging waste cannot legally be sent to landfills, and landfill operators are prohibited from accepting such waste.

Municipalities must implement systems for the separate collection of recyclable waste under the national Zero Waste framework. The *Zero Waste Regulation*, introduced in 2019, sets out the objective of establishing a comprehensive zero-waste management system and creates a "Zero Waste Certificate" for buildings and facilities that comply with its requirements. Certain facilities, such as industrial sites, shopping centres, and transport terminals, are obliged to obtain higher-level certifications. The Zero Waste Regulation imposes mandatory source separation of plastic waste at all participating facilities aiming to improve the quality of recyclable plastic and reduces the contamination issues that have long hindered effective recycling.

Through the Zero Waste legislation, a mandatory deposit-return system for certain beverage packaging was put in place. The implementation of the system started in 2025 in the region of Sakarya and has been extended to 18 provinces afterwards. The timeline for the nation-wide implementation is not known yet.

Permitting and licensing of plastic recycling and recovery facilities in Türkiye is governed through the environmental permitting framework administered by the Ministry of Environment, Urbanisation and Climate Change. Facilities undertaking recycling or recovery activities are required to obtain an Environmental Permit and Licence Certificate, which specifies the authorised waste treatment activities and the nominal processing capacity of the installation. The permitted capacity is determined on the basis of technical documentation submitted by the operator, including information on equipment, process design and intended throughput, and forms the basis for subsequent regulatory controls, including the calculation of import quotas for plastic waste. In principle, the permitting process involves administrative

⁴ Law No. 2872, published in Resmî Gazete No. 18132 on 11 August

1983. <https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=2872&MevzuatTur=1&MevzuatTertip=5>

⁵ Republic of Türkiye. Waste Management Regulation. Official Gazette No. 29314, April 2, 2015. <https://www.resmigazete.gov.tr/eskiler/2015/04/20150402-2.htm>

⁶ Producers and importers finance recycling efforts through the Recycling Participation Fee (GEKAP), which started to apply in 2020 and is tied to the volume of packaging placed on the market.

review and, where applicable, on-site inspection prior to the issuance of the permit, followed by periodic inspections and reporting obligations once operations commence.

The detailed implementation framework for plastic packaging is provided by the **Packaging Waste Control Regulation** of 26 June 2021 which applies to all packaging placed on the Turkish market. This Regulation emphasises material recycling as the primary method for managing packaging waste. Energy recovery should only be used as a last resort where material recycling is not feasible. It also requires compliance with sustainable packaging design principles and links packaging waste management with the nationwide Zero Waste System and the Deposit-Return System (DRS).

Moreover, any residual waste that may arise from plastic recycling processes, such as contaminated film, labels, sludges, or process rejects, is regulated by the general provisions on pre-treatment and recovery in the Waste Management Regulation. Any material resulting from pre-treatment activities is still considered waste and must be managed in licensed facilities.

The legal framework therefore establishes a comprehensive regime for plastic waste management. Limited information is however available on emission limits and pollution controls for recycling facilities and other waste treatment operations. In addition, the legal framework is focused primarily on improving collection and recycling, with less emphasis on waste prevention and plastic reduction.

Türkiye's legal framework also requires the measurement, documentation and disclosure of waste generation, collection, treatment and recovery, including plastics. The institutional core of **reporting** is the Integrated Environmental Information System (EÇBS), which is the Ministry of Environment, Urbanisation and Climate Change's central online portal. Companies, municipalities and registered facilities need to submit declaration via EÇBS. Other systems include the Packaging Information System, which records data on packaging placed on the market; the Waste Declaration System (TABS) which captures annual quantities of hazardous and non-hazardous waste generated as well as information on how this waste is handled; the Mobile Waste Tracking System (MoTAT) which enables vehicle-based tracking of waste consignments; and the Mass Balance System (KDS) which reconciles input and output flows. The Zero Waste Information System, also hosted within EÇBS, supports certification and reporting by recording site-level segregation performance and inventories. The ministry and accredited compliance organisations use these datasets for compliance checks and policy monitoring, while facilities must maintain records for inspection and audit.

Legal framework on the shipments of plastic waste and requirements related to imported waste

Türkiye implements its obligations under the Basel Convention through a combination of national legislation, import controls, and administrative procedures governing transboundary waste movements. The Convention is transposed primarily through Environmental Law No. 2872, the Waste Management Regulation, and secondary legislation regulating the import, transit, and inspection of waste shipments.

After the adoption of new entries on plastic waste in the Basel Convention, Türkiye amended its national framework by introducing stricter classification, control, and consent requirements. As a result, since 2021, plastic waste imports have been subject to a successive set of requirements enacted in different Communiqués on Import Inspection of Wastes⁷ issued by the

⁷ Such as the Communiqué No. 2025/3 on Import Inspection of Wastes adopted on 31 December 2024, published in Resmî Gazete No. 32769: [communiqu-on-import-inspection-of-wastes-under-control-for-environmental-protection-20250929092559.docx](#)

Ministry of Trade which are stricter and more detailed than the provisions of the Basel Convention. These requirements have been regularly modified, which has created some uncertainties for operators and public authorities in charge of waste shipment in the EU. The exact classification of the types of plastic waste that can be authorized for import into the country has been subject to regular discussions; as an example, the Turkish authorities announced in July 2021 a ban on the import of polyethylene plastics (commonly used in packaging), before eventually reversing this ban. As a member of the OECD, Türkiye notified to the OECD the rules applying to the import of plastic waste into its territory⁸: from this notification, it appears that only certain types of plastic waste covered by dedicated waste or customs codes are allowed for import into Türkiye. In addition, Türkiye requires that this waste meets a 1% contamination ratio to be allowed for import. Overall, **the rules on the import of plastic waste are stricter than the requirements under the Basel Convention and only authorize the import of clean fractions of specific waste streams which are suitable for recycling.**

The Communiqués also cover procedures related to the inspection of waste shipments and waste management operations, defines obligations for importers and regulatory authorities.

Waste imports are restricted to professionals who operate licensed recycling facilities and who hold either a Temporary Activity Certificate or a full Environmental Permit and License issued by the Ministry of Environment, Urbanisation, and Climate Change. These operators may import eligible waste streams in accordance with detailed procedures established by the Ministry, following consultation with the Ministry of Trade.

Imported plastic waste is subject to reporting and compliance obligations beginning prior to entry at the border. Importers are required to declare the type, quantity and characteristics of incoming plastic waste, the intended processing route, and the destination facility. These declarations are subject to risk screening and, where applicable, physical inspection at customs, based for example on the risk-based electronic control system operated by the Ministry of Trade (TAREKS)⁹.

In addition, Türkiye introduced a quantitative restriction on plastic waste imports. Since 2022, the allowable import volume for plastic waste has been capped at 50% of the certified annual processing capacity of each importing facility¹⁰.

The quota is not granted in a single annual block but instead released gradually in four equal quarterly tranches. The quota regime is embedded in a broader system of administrative oversight: facilities must hold a Waste Importer Registration Certificate and undergo annual inspections, aligning import allowances with verified processing performance and compliance checks. If it is determined that the importer has exceeded the quota calculated by the Ministry, the Waste Importer Registration Certificate shall be revoked for the remainder of the year in which the violation was identified, and no new certificate applications shall be accepted until the end of that calendar year. Additionally, these persons or entities are further subject to the administrative sanctions set forth in the Environmental Law No. 2872. For the following year, the quota to be calculated shall be reduced by 10%.

⁸ See <https://www.oecd.org/content/dam/oecd/en/data/tools/transboundary/update-26-01-28-reporting-of-controls-non-hazardous-plastic-waste.pdf>

⁹ More information available at: <https://ticaret.gov.tr/urun-guvenligi/tareks>

¹⁰ activities such as collection, separation, pressing, and crushing are excluded from the capacity calculation, ensuring that quotas reflect only genuine recycling or recovery capability rather than preliminary or non-transformative operations.

National capacity for environmentally sound plastic waste management and challenges linked to mismanagement of plastic waste

Comprehensive data on waste management in Türkiye is not publicly available. The Turkish Statistical Institute has been publishing data on waste management, based on reporting from municipalities, but this data only covers some waste streams. According to this data, around 80% of municipal waste was destined to landfilling and about 12% to recycling in 2021. The challenges linked to the collection and publication of data on waste management in the country were highlighted in a recent report by the European Environmental Agency (EEA)¹¹ which also points out that a new methodology is being prepared by the Turkish Statistical Institute and the Ministry of Environment, Urbanisation and Climate Change.

In addition, and particularly in urban areas, evidence and stakeholder interviews show that some of the plastic recycling operations occur in the informal sector, operating without official contracts or complex infrastructure. As these activities operate outside formal municipal and extended producer responsibility systems, their contribution to collection and sorting is not reflected in official statistics, affecting the completeness of reported data.

In that context, **it is difficult to find official data on the overall generation, collection and treatment (including recycling) of plastic waste in Türkiye.** Estimates put forward by various sources¹² refer to the generation of 3.3 to 3.9 million tonnes of domestic plastic waste annually. In the absence of official statistics, several stakeholders¹³ interviewed for the elaboration of this document have estimated that only around 10% of plastic waste is actually recycled, with most plastic waste still going to landfills, being mismanaged, or leaking into the environment.

Overall, in terms of future targets for waste recycling, the National Waste Management Strategy and Plan (2025–2035)¹⁴ sets out a structured sequence of milestones. These include the cessation of waste acceptance at uncontrolled dumping sites by the end of 2028, the achievement of at least 70% of separate collection of packaging waste from 2031 onwards, and a long-term objective of ensuring that a minimum of 60% of municipal waste is recovered by 2035¹⁵.

Imported plastic waste comes on top of domestic plastic waste. Türkiye has a large plastics manufacturing and recycling sector, which relies on a steady supply of waste, including from

¹¹ <https://www.eea.europa.eu/en/topics/in-depth/waste-and-recycling/municipal-and-packaging-waste-management-country-profiles-2025/tr-municipal-waste-factsheet.pdf>

¹² See in particular “Türkiye’s Plastic Waste Imports: Environmental Risks and Policy Options” June 2026 - Istanbul Policy Center-Sabancı University-Stiftung Mercator Initiative, available at <https://ipc.sabanciuniv.edu/Content/Images/CKeditorImages/20260706-09075322.pdf>; and https://eia-international.org/wp-content/uploads/EIA_UK_Plastic_Waste_Trade_Report_0123_FINAL_SPREADS.pdf

¹³ Stakeholders interviewed include academia, NGOs, enforcement authorities, recycling operators, government ministries, the informal sector, and plastics-related businesses

¹⁴ T.C. Çevre, Şehircilik ve İklim Değişikliği Bakanlığı, Çevre Yönetimi Genel Müdürlüğü. National Waste Management and Strategy Plan 2025–2035. Ankara, 2025. https://webdosya.csb.gov.tr/db/cygm/eduardosya/National_Waste_Management_and_Strategy_Plan_2025-2035.pdf

¹⁵ T.C. Çevre, Şehircilik ve İklim Değişikliği Bakanlığı. “Bakan Kurum: Sıfır Atık Prensipleriyle 2025–2035 Ulusal Atık Yönetimi Stratejisi ve Planı’nı Hazırladık.” *Resmî Basın Açıklaması*, March 17, 2026. <https://csb.gov.tr/haberler/bakan-kurum-sifir-atik-prensipleriyle-2025---2035-ulusal-atik-yonetimi-stratejisi-ve-planini-hazirladik-302189>

abroad. **Imported waste is often considered more attractive to recyclers because it arrives pre-sorted and of higher quality, whereas domestically collected waste is more contaminated and costly to process.** Turkish companies import bales of plastic packaging waste (primarily from the UK, Germany, Belgium and other EU countries) to feed their recycling plants, turning waste into pellets for resale. In the last years, Türkiye's plastic recycling capacity expanded significantly; by 2020, over 1 300 plastic recycling facilities were licensed nationwide, with major hubs around Adana (the country's plastic-recycling epicentre) and Istanbul. There is however no consolidated data on the overall capacity of the Turkish plastic recycling industry. Although mechanical recycling capacity has grown significantly in recent years, some stakeholders indicate this capacity is not sufficient to treat all domestically generated plastic waste together with imported waste. Assuming the domestic plastic waste generation of around 3.5/4 million tonnes of plastic waste and imported plastic waste reaching approximately 680–900 thousand tonnes, it is unlikely that the recycling capacity is sufficient to deal with all (domestic and imported) plastic waste in the country. Actually, a calculation based on the requirement that recycling facilities should not accept imported plastic waste exceeding 50% of their plastic waste treatment capacity indicates that the capacity for the overall plastic waste recycling industry should be at least in the magnitude of 1.4 million tonnes (the level of imported plastic waste into Türkiye multiplied by two).

In this context, **several reports were issued in the last years exposing the environmental damages linked to mismanaged plastic waste in Türkiye¹⁶.** These reports point to serious problems linked to both domestic and imported plastic waste. Several cases of mismanaged plastic waste were reported, notably in the Adana region, resulting in a series of fires in sites where plastic waste was stored, as well as plastic pollution affecting waterways and wildlife and contributing to plastic pollution in the Mediterranean Sea. Media exposure and regulatory changes have since supposedly reduced the number of such incidents in recent years, but available public information does not allow for systematic verification of their current frequency or of the enforcement actions taken in response. One particular problem linked to the import of plastic waste has been the absence of environmentally sound management of “residual waste” which is too contaminated to enter the recycling process. This is typically packaging waste which, if not properly managed, is openly burned or dumped. The leakage of microplastic through wastewater discharges from plastic recycling facilities has also been identified as a source of water and marine pollution¹⁷.

The low level of separate collection and sorting of domestic waste constrains the supply of locally generated plastic waste to Turkish recycling facilities. The development of the plastic recycling industry seems to be correlated with the import of waste from abroad rather than designed to deal with domestic waste. In this context, the increase in the import of waste from third countries does not incentivise progress in domestic plastic waste management. The reliance by the Turkish recycling industry on imported waste could even present a risk of hampering progress for a better domestic waste management system, as there are no clear economic or legal incentives for domestic plastic waste to be better collected, sorted and recycled.

¹⁶ See in particular “ Türkiye's Plastic Waste Imports: Environmental Risks and Policy Options” June 2026 - Istanbul Policy Center-Sabancı University-Stiftung Mercator Initiative, available at

<https://ipc.sabanciuniv.edu/Content/Images/CKeditorImages/20260706-09075322.pdf>

¹⁷ <https://link.springer.com/content/pdf/10.1007/s10661-026-15263-8.pdf>

Implementation, enforcement and compliance with requirements governing plastic waste management

While Türkiye has developed a comprehensive legal framework on plastic waste management, there is overall only limited information on how this framework is implemented and enforced in practice.

The enforcement framework regarding plastic waste management in Türkiye is mostly anchored in Environmental Law No. 2872, which establishes:

- a prohibition to release, store, transport, or dispose of any type of waste—including plastics—into the environment in breach of established standards;
- administrative fines for individuals and legal persons who violate the prohibition on improper waste disposal¹⁸ as well as other measures designed to address activities that cause or risk causing environmental harm, including suspending operations, stopping harmful practices, and other corrective or remedial actions;
- judicial penalties for parties who arrange misleading documents or provide false information regarding waste management and environmental impact reporting. Such offences are punishable by imprisonment ranging from one to three years for document falsification, and six months to two years for providing misleading information, unless the action is subject to a more severe penalty under other laws;
- provisions on liability for environmental damage, requiring compensation to be paid for the harm caused, in addition to administrative and judicial penalties.

The fine levels are updated annually by a communiqué in the Official Gazette to maintain deterrence; for instance, the latest update was made at the end of 2025¹⁹.

Overall, according to the 2024 Turkish Environmental Inspection Statistics, a total of 63 371 inspections were carried out nationwide, of which 63 182 were performed by Provincial Directorates and 189 by the Ministry's central organisation²⁰. These inspections cover all main areas of environmental compliance, air, water, waste, noise, soil and others, therefore including enforcement actions related to waste and waste management practices. Furthermore, in 2024, authorities imposed 7 448 administrative sanctions. Within this total, 950 sanctions fell specifically under the category of “waste” which comprises waste management obligations, and Zero Waste-related compliance, thus directly covering the regulatory framework applicable to the management of plastic waste.

Error! Reference source not found.3 below illustrates the evolution of administrative sanctions and the corresponding fines imposed by the MoEUCC for domestic waste management between 2015 and 2024. Within this time frame, a steady increase in the number of administrative sanctions applied to facilities and/or entities dealing with domestic waste management was recorded, while the total value of fines imposed rose substantially.

¹⁸ Individuals are subject to a fine of 100,000 TL (approx. 1,990 EUR) for initial offences. If the individual fails to comply after receiving appropriate notification from the authorities, the fine increases to 500,000 TL (approx. EUR 9,95). Legal persons, including enterprises and other commercial entities that commit similar violations face more severe penalties: the fines are tripled for legal persons, and for entities subject to balance sheet accountancy, these are applied at five times the rate imposed on individuals.

¹⁹ Republic of Türkiye. 7552 Sayılı İklim Kanunu Uyarınca Verilecek İdari Para Cezalarına İlişkin Tebliğ (2026/1).

Issued by the Ministry of Environment, Urbanisation and Climate Change (Climate Change Presidency).

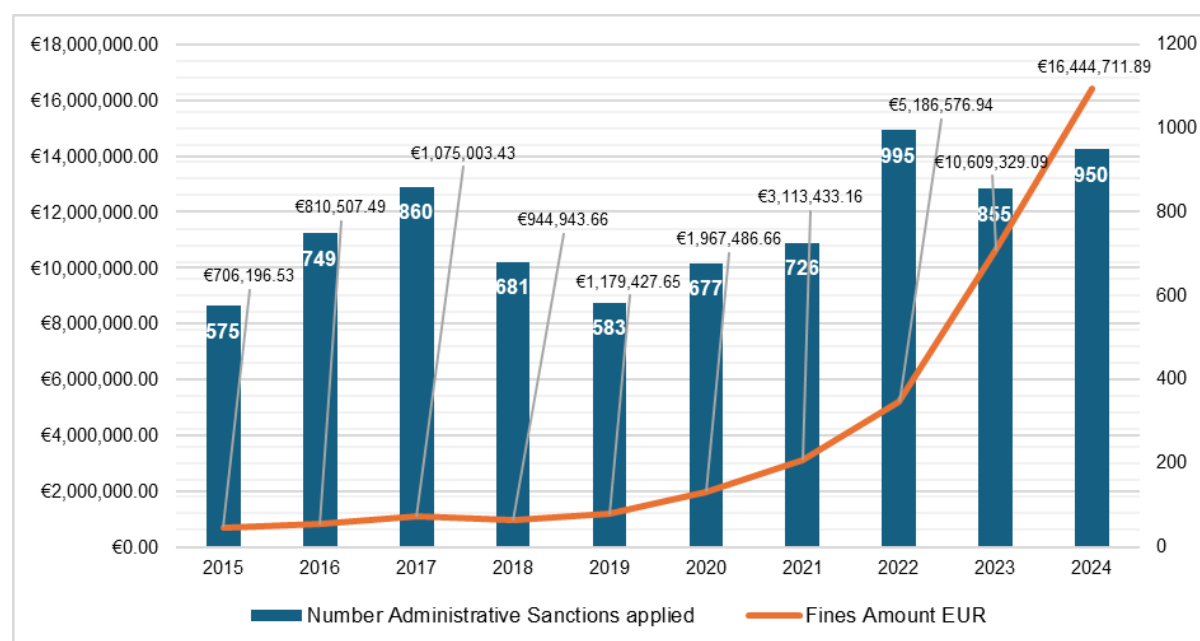
Published in Resmi Gazette No. 33120 on 27 December

2025. <https://www.resmigazete.gov.tr/eskiler/2025/12/20251227-11.htm>

²⁰ T.C. Çevre, Şehircilik ve İklim Değişikliği Bakanlığı, *Çevre Denetimi İstatistikleri: 2024 – Haber Bülteni* (Ankara: T.C. Çevre, Şehircilik ve İklim Değişikliği Bakanlığı, 2025), <https://webdosya.csb.gov.tr/db/ced/icerikler/2024-cevre-denet-m---stat-st-kler--20250521091732.pdf>

Financial penalties increased from EUR 700 000 in 2015 to EUR 16.4 million in 2024. By 2024, the value of fines has risen considerably compared to the number of sanctions, suggesting higher fines per violation detected.

Figure 3: Number of administrative sanctions applied vs. fines amount in EUR imposed by the Ministry of Environment, Urbanisation and Climate Change for domestic waste management, 2015 – 2024



Source: Own elaboration of data extracted Ministry of Environment, Urbanisation and Climate Change, Environmental Inspection Statistics: News Bulletin 2018 – 2024

The fines imposed for waste-related infringements reached over TL 840 million (approx. EUR 16.5 million), representing the largest single share (45%) of all environmental penalties applied in 2024. In addition, 402 activity shutdown-decisions were issued in 2024, but these data are not specific to waste management facilities.

The growth observed in the flows of imported plastic waste should logically be accompanied by a commensurate effort to ensure a proper implementation and enforcement of the legal framework designed to ensure its environmentally sustainable management. While the official statistics demonstrate a noticeable increase in the amount and level of sanctions imposed by the Turkish authorities to address breaches of environmental legislation, weak enforcement of the rules designed to ensure an environmentally sound management of plastic waste is very often mentioned as a key concern by public and private stakeholders pointing to the following elements:

- First, there are questions relating to the effectiveness of inspections. While licensed facilities are formally subject to regular inspection and documentation requirements, stakeholders pointed to challenges related to informal or non-compliant operators and differences in enforcement capacity between provinces. Inspections are not always conducted with the same frequency or intensity across facilities and provinces, and are sometimes notified in advance, which limits their effectiveness.

Stakeholders indicate that challenges remain in consistently distinguishing compliant plastic waste shipments from non-compliant ones in practice, particularly with regard to contamination thresholds, mixed loads, and downstream treatment capacity.

Questions have also been raised on the effectiveness of the traceability systems which do not cover the fate of plastic waste after it has reached the intended facility. Another example mentioned by stakeholders relates to the implementation and enforcement of the 50% cap for imported waste applicable to recycling facilities. Stakeholders questioned whether the quota is genuinely applied as intended, and if the “capacity” declared by the facilities is not overestimated to allow some of them to import a higher volume compared to what they should be allowed. According to these stakeholders, weak verification and capacity utilisation limits the effectiveness of the quota as a tool to prioritise domestically generated plastic waste. In addition, publicly available information does not allow for systematic verification of whether imported and domestically generated plastic waste is consistently treated within the same installations or under identical operational conditions.

- In addition, the data granularity prevents linking sanctions to plastic waste mismanagement. The sanctions provided above are not granular enough to demonstrate whether the sanctions are properly addressing serious instances of plastic waste mismanagement. Cross-border waste trafficking is known to be a highly lucrative business, and it is essential that fines and other sanctions are sufficiently deterrent to prevent illegal operators to continue their activities. Specific information on this issue, for the case of plastic waste, is not available.
- Lack of transparency affects monitoring of enforcement. The lack of public access to inspection reports, emissions data, and information on corrective actions following incidents (e.g. fires, illegal dumping, open burning and other type of plastic-related pollution) linked to the mismanagement of plastic waste constrains independent verification and assessment of enforcement outcomes.
- Finally, unclear repartition of tasks between various public institutions affects the overall implementation of the legal framework on the management and shipment of plastic waste. The overall implementation appears to be a shared responsibility between a multitude of public authorities (Ministry of the Environment, Ministry of Trade, customs, regional authorities, municipalities). It is not clear how the repartition of the tasks is organised between all these authorities and how cooperation is ensured to guarantee that the policy objectives and legal obligations set at the national level for the environmentally sound management of waste are met. In addition, impact assessments or public consultations are either not carried out or not made public ahead of the publication of new regulatory or policy developments.

Cooperation between the EU and Türkiye

The EU and Türkiye have been cooperating on issues relating to the shipments of plastic waste through different channels over the last years. The European Commission informed the Turkish authorities on the content of the WSR and its consequences for the export of waste to Türkiye in the framework of the Customs Union Committee and the regular dialogue between the EU and Türkiye on the environment. In view of the importance of Türkiye as the main destination for waste exported from the EU, the Commission organised a “Technical Assistance and Information Exchange (TAIEX)” event in Ankara in December 2025 with authorities from various departments of the Turkish administration, representatives of the industry and representatives of enforcement agencies from some EU Member States. It was designed to exchange information on waste management, with a particular focus on the control of shipments of waste from the EU and the implementation of the Turkish legislation on waste

shipment and waste management. The European Commission has also been in contact with civil society organisations working on waste management and environmental issues in Türkiye. Furthermore, cooperation is ongoing between the EU anti-fraud office and enforcement agencies in Türkiye, and the European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) has also been regularly working with the Turkish authorities, for example to ensure that the right information on the Turkish legislation on the import of plastic waste is communicated to enforcement agencies in the EU Member States and help deal with particular cases.

At the level of EU Member States, bilateral contacts have also been taken, for example to address illegal shipments between a given Member State and the relevant Turkish authorities.

Despite the above initiatives, exchanges with the various Turkish authorities would need to be enhanced and intensified. Several authorities in EU Member States experienced difficulties in getting responses from the Turkish authorities on specific cases, as well as in building long-standing cooperation with them. There is therefore a potential to enhance cooperation between the Turkish authorities and the EU institutions and EU Member States to facilitate the exchange of information relating to the shipments and management of plastic waste, especially in relation to possible cases of illegal shipments.

CONCLUSIONS

The assessment by the Commission services conducted in line with the provisions of Article 45(5) of the Waste Shipment Regulation shows that **Türkiye has strengthened its legal, institutional, and strategic framework for plastic waste management, which broadly aligns with international and EU rules. Türkiye has also recently strengthened the enforcement of its environmental legislation.**

However, the assessment also identified that **more information is needed in order to determine to what extent the authorities of Türkiye are adequately addressing all challenges linked to ensuring that the large volume of plastic waste imported from the EU is managed in an environmentally sound manner and that the import of such waste does not hamper the development of the proper management of plastic waste generated domestically.**

The most critical points are the following:

1. **Limited information on plastic waste generation, collection, treatment (including recycling, incineration and landfilling), import, as well as on the treatment of residual waste.** When data are published, they are not sufficiently disaggregated and not always consistent. As a result, it is difficult to assess whether plastic waste is effectively managed in an environmentally sound manner, if the overall situation on plastic waste management has improved in the last years, and what is the real impact of imported plastic waste on the environment. Installed capacity exists but it is unclear if it is sufficient to ensure the environmentally sound management of all domestic and imported plastic waste, given weak verification and low domestic collection. In that respect, the risk that imports may undermine domestic waste management remains a concern.

2. **Uncertainty on the effectiveness of implementation and enforcement of the legislation.**
A recurring concern by stakeholders is the gap between what is prescribed by law and the reality on the ground. Official data show an increase in inspections and sanctions linked to environmental breaches, but they do not relate specifically to plastic waste management. The ability of enforcement agencies to detect non-compliance in practice can be limited when inspections are not carried out unannounced. It is also unclear if the frequency and the level of penalties to address serious instances of plastic waste mismanagement (fires, open burning, open dumping, uncontrolled releases of micro-plastics, air, water or soil pollution) are sufficient to have a deterrent effect on illegal operators;
3. **Fragmented governance and limited stakeholder involvement in the design and implementation of the policy designed to ensure the management of domestic and imported plastic waste.** The responsibility for such policy is split between different Ministries, regional authorities and municipalities, without clear coordination. The authorities in the EU Member States indicated that it is challenging to obtain feedback from their counterparts in the public authorities of Türkiye when they face problems with shipments of plastic waste. In addition, the engagement of civil society in decision-making is limited, and so is transparency of data on the impact of the policy carried out by Türkiye to ensure the environmentally sound management of plastic waste.

These findings do not lead to the conclusion that Türkiye is failing to manage plastic waste imported from the EU in an environmentally sound manner but point to the need for substantial improvements in the areas identified above.

The Commission services intend to continue working together with the authorities and stakeholders from Türkiye, in cooperation with the EU Member States to gather more information on:

- a) **plastic waste imports to Türkiye, the generation, collection and treatment of such waste in the country as well as on the treatment of residual waste;**
- b) **the effectiveness of implementation and enforcement of the legislation; and**
- c) **the governance and stakeholder involvement in the design and implementation of the policy designed to ensure the management of domestic and imported plastic waste.**

The Commission services will follow up accordingly and reach out to the authorities of Türkiye after the release of this document to agree on a more granular and structured exchange and cooperation to explore how to support the implementation of measures needed for improvements and ensure progress. The Commission services will base their reassessment of the situation on the information gathered through the exchange with the Turkish authorities and stakeholders, as well as any other relevant information and data. Such re-assessment is envisaged by end 2028.

It is also clear that the EU has a responsibility in better managing its domestic plastic waste, as well as controlling and monitoring the export of this waste to third countries like Türkiye. Such control already became stricter from 21 May 2026, when the procedure for the export of all plastic waste from the EU to third countries was changed, with the effect that such exports are now subject to the “prior informed consent” procedure: this will ensure that the public authorities from the exporting, transit and importing countries provide their consent before any shipment of plastic waste takes place, even for clean fractions²¹ which have been until then

²¹ Covered by entry B3010 under the Basel Convention

shipped to third countries under the green-listed procedure. The Commission intends to work with the EU Member States authorities, the Turkish authorities and economic operators to ensure a proper implementation of this new procedure for all plastic waste. In addition to this regulatory change, the Commission services will continue to monitor the export of plastic waste and other waste to third countries, in line with the requirements of the WSR.