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**ANNEX VI**

to the Commission Implementing Decision on the Annual action plan in favour of Türkiye for 2024

**Action Document for Environment and Climate Change**

**ANNUAL ACTION PLAN**

This document constitutes the annual work programme in the sense of Article 110(2) of the Financial Regulation, and annual and multiannual action plans and measures in the sense of Article 9 of IPA III Regulation and Article 23(2) of NDICI - Global Europe Regulation.

**1. SYNOPSIS**

**1.1. Action Summary Table**

<b>Title</b>	Environment and Climate Change Annual action plan in favour of Türkiye for 2024
<b>OPSYS</b>	OPSYS business reference: ACT-62858
<b>ABAC</b>	ABAC Commitment level 1 number: JAD.1655607
<b>Basic Act</b>	Financed under the Instrument for Pre-accession Assistance (IPA III)
<b>Economic and Investment Plan (EIP)</b>	No
<b>EIP Flagship</b>	No
<b>Team Europe</b>	No
<b>Beneficiar(y)/(ies) of the action</b>	The action shall be carried out in Türkiye
<b>Programming document</b>	IPA III Programming Framework
<b>PRIORITY AREAS AND SECTOR INFORMATION</b>	
<b>Window and thematic priority</b>	Window 3: Green Agenda and Sustainable Connectivity Thematic Priority 1: Environment and climate change

<b>Sustainable Development Goals (SDGs)</b>	Main SDG: SDG 13: Take urgent action to combat climate change and its impacts Other significant SDGs: SDG 5: Gender equality SDG 7: Affordable and Clean Energy SDG 8: Decent Work and Economic Growth SDG 9: Industry, innovation and infrastructure SDG 11: Sustainable Cities and Communities SDG 12: Responsible consumption and production SDG 14: Life Below Water SDG 15: Life on Land SDG 17: Partnerships for the Goals			
<b>DAC code(s)</b>	Main DAC code – 41010 - Environmental policy and administrative management-55% Sub-code 2 – 24010 - Financial policy and administrative management-10% Sub-code 5 – 14050 - Waste management/disposal-35%			
<b>Main Delivery Channel</b>	Central Government – 12001			
<b>Targets</b>	<input checked="" type="checkbox"/> Climate <input type="checkbox"/> Gender <input type="checkbox"/> Biodiversity			
<b>Markers (from DAC form)</b>	<b>General policy objective</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Participation development/good governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Aid to environment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Gender equality and women’s and girl’s empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<b>RIO Convention markers</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Climate change adaptation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Internal markers and Tags</b>	<b>Policy objectives</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	EIP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	EIP Flagship	YES <input type="checkbox"/>		NO <input checked="" type="checkbox"/>
	Tags:	YES		NO
	Transport	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Energy	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Environment and climate resilience	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Digital	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Economic development (incl. private sector, trade and macroeconomic support)	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Human Development (incl. human capital and youth)	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Health resilience	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Migration and mobility	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Agriculture, food security and rural development	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Rule of law, governance and Public Administration reform	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Other	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	Digitalisation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Tags	YES		NO
	digital connectivity	<input checked="" type="checkbox"/>		<input type="checkbox"/>
	digital governance	<input checked="" type="checkbox"/>		<input type="checkbox"/>
	digital entrepreneurship	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	digital skills/literacy	<input type="checkbox"/>		<input checked="" type="checkbox"/>
	digital services	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Connectivity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Tags	YES		NO	
digital connectivity	<input checked="" type="checkbox"/>		<input type="checkbox"/>	
energy	<input type="checkbox"/>		<input checked="" type="checkbox"/>	
transport	<input type="checkbox"/>		<input checked="" type="checkbox"/>	

	health	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	education and research	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Migration	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reduction of Inequalities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	COVID-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>BUDGET INFORMATION</b>			
<b>Amounts concerned</b>	Budget line: 15 020201 Total estimated cost: EUR 6 000 000.00 Total amount of EU budget contribution EUR 6 000 000.00 of which EUR 6 000 000.00 for indirect management with IPA III beneficiary.		
<b>MANAGEMENT AND IMPLEMENTATION</b>			
<b>Implementation modalities (management mode and delivery methods)</b>	Project Modality Indirect management with the Republic of Türkiye		
<b>Final Date for conclusion of Financing Agreement</b>	At the latest by 31 December 2025		
<b>Final date for concluding contribution / delegation agreements, procurement and grant contracts</b>	3 years following the date of conclusion of the financing agreement, with the exception of cases listed under Article 114(2) of the Financial Regulation		
<b>Indicative operational implementation period</b>	72 months following the conclusion of the financing agreement		
<b>Final date for implementing the Financing Agreement</b>	12 years following the conclusion of the financing agreement		

## 1.2. Summary of the Action

This action aims primarily at facilitating Türkiye's alignment with the EU *acquis* on Chapter 27 'Environment and Climate Change', as well as contributing to foster national strategies and global targets such as the Sustainable Development Goals (SDGs), mainly SDG 13, which requires taking urgent action to combat climate change and its impacts, and SDG 12 which requires ensuring sustainable consumption and production patterns.

Under the AoS (1) this action aims to **make an assessment of the application** of the Carbon Border Adjustment Mechanism (CBAM), Sustainable Product Initiative (SPI) and related European Green Deal

(EGD) legislation in a holistic manner, and identify key areas of action; **enhance institutional capacities** of public and private stakeholders while providing **simplified and easy-access resources of information** like guidelines, web-based platform considering the interlinkage between various EGD legislation. The work is aimed to be conducted on a sectoral basis and main criteria for sector selection will be the new CBAM sectors in case of possible extension of CBAM and priority sectors determined in Work Plan of 2024-2027 for product-based eco-design rules. The goal is to consolidate the existing fragmented information in sectors and institutions to develop a more comprehensive perspective.

Under the AoS (2) this action aims to **promote the implementation of the National Circular Economy Action Plan that is still in the making and reduce the environmental and climate impacts of 6 key sectors, i.e. textile, plastics, food, batteries and vehicles, packaging, electronics and ICT** (Information and Communications Technology), through reduction, reusing and recycling, and to strengthen the implementation capacity of circular economy principles in 6 cities while considering the widespread dissemination of the application nationwide. To this end, roadmaps (referring to related BAT and BREFs) will be prepared for 6 key sectors by clarifying the issues regarding the design, production, sustainable consumption, separate waste collection, reduction, recycling and economic instruments on waste management to promote circular economy concept will be enhanced in relevant municipalities in piloted cities.

The action, with its special focus on local empowerment via the targeting of the 6 pilot cities and engagement of all social groups via ensuring consultation, systematic involvement and sharing of information with CSOs. Among social groups especially women, the action will also take the EU Gender Action Plan (GAP) III into consideration during implementation. Efforts will be made for equal participation of women in related decision-making processes and gender differentiated data will be collected where possible. Meanwhile, the studies involving workshops and other channels for participation will inevitably support participation development.

### 1.3 Beneficiar(y)/(ies) of the Action

The action shall be carried out in the Republic of Türkiye.

## 2. RATIONALE

### 2.1. Context

For the Republic of Türkiye, Chapter 27: Environment and Climate Change was opened on 21 December 2009. Türkiye is a party to the United Nations Framework Convention on Climate Change (UNFCCC)<sup>1</sup> since 2004. Türkiye signed the Paris Agreement<sup>2</sup> on 22 April 2016, and officially became a party on 10 November 2021, announcing its ambition to reach net-zero-emissions by 2053 and later announced the greenhouse gas emissions reduction target for 2030 compared to the Business-as-Usual scenario given in Türkiye's first Nationally Determined Contribution (NDC), with an expected peaking date at the latest in 2038. However, as indicated in the Türkiye Report<sup>3</sup> as part of the 2023 Enlargement Package, Türkiye should complete its alignment with the EU *acquis* on climate action and finalise the pending contributions required under the Paris Agreement on climate change. Türkiye is expected to soon take steps in order to enhance the level of implementation of waste management plans at local and regional level. Türkiye needs to increase its capacity to align with the EGD legislation and take concrete steps to ensure implementation, to reach climate objectives. This action will contribute to the EGD alignment goals of Türkiye including those relevant to SPI and CBAM along with various legislation relevant to GDAP, and transition to circular economy as well as strengthening integrated waste management.

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<sup>1</sup> <https://unfccc.int/>

<sup>2</sup> [https://unfccc.int/sites/default/files/english\\_paris\\_agreement.pdf](https://unfccc.int/sites/default/files/english_paris_agreement.pdf)

<sup>3</sup> [https://neighbourhood-enlargement.ec.europa.eu/turkiye-report-2023\\_en](https://neighbourhood-enlargement.ec.europa.eu/turkiye-report-2023_en)

In 2019, the EU adopted the EGD, with the landmark objective of making Europe the first climate-neutral continent by 2050. The EU aims to implement significant legislative changes across various areas of action to achieve a green transition. These legislative changes have direct impacts on the free movement of goods, and Türkiye needs to align with these legislations not only to achieve a green transition but also to maintain the deep integration of value chains within the framework of the Customs Union (CU).

The structure of the EGD requires a holistic approach, where no single policy can be effectively adopted at the expense of another. For instance, CBAM has been designed to mirror EU carbon pricing under the EU Emissions Trading System (ETS) for imports from third countries, aiming to prevent carbon leakage. Initially, the mechanism has been introduced for energy-intensive sectors and will be reviewed for potential expansion to other sectors. This dynamic process will require not only the calculation and verification of carbon emissions but also the industry's decarbonisation efforts, which can only be achieved through a transition to a circular economy and the adoption of other related EGD policies.

Circular economy transformation is largely supported by new policies and legislation adopted globally. Among the key policy documents guiding the circular economy endeavours are EGD, CEAPs of 2015 and 2020 (related updates also) prepared by the EU. These plans laying down priority actions to drive transition to a more circular economy are reinforced through a number of thematic and sectoral legislation.

SPI has been announced on 30 March 2022 as one of the main pillars of the CEAP. Along with product legislation, EU aims to make sustainability a norm and adopt product-based eco-design rules based on the general framework adopted. In response to the EGD, Türkiye adopted the Green Deal Action Plan<sup>4</sup> (GDAP) in July 2021, prepared as a roadmap and implementation calendar aiming to attract green investments to the country and support green transformation in all relevant policy areas. Six out of nine main areas of this policy document are related with IPA III Window 3-Thematic Priority 1 area. For policies connected to this Action, this action plan is the most important source of reference. The 9 main headings of the GDAP, which include CBAM, the green and circular economy, information and awareness raising activities among others, comprise a total of 32 objectives and 81 actions. The present GDAP will be updated in 2024 in accordance with the latest advancements in EGD, as stated in the Medium-Term Program (2024-2026), carbon pricing system will be established, and circular economy policies will be developed accordingly. The 12<sup>th</sup> National Development Plan of Türkiye (NDP) (2024-2028)<sup>5</sup> links climate change with environmental problems and promotes the main objective of protecting the environment and natural resources while increasing the awareness in local populations at a national level. The plan aims to increase efficiency and competitiveness on the axis of digital and green transformation in all sectors, particularly priority sectors, in order to shift to a high value-added production structure. The overall objective of the IPA III Strategic Response of Türkiye for the IPA III Under Window 3-Thematic Priority 1 is to contribute to promoting the EGD by increasing environmental protection; contributing to climate change mitigation; increasing resilience and adaptation to climate change; accelerating the shift towards a low-emission and circular economy among others.

This action is consistent with the enlargement policies and EGD through fostering the implementation of GDAP, aiming environmental protection, climate change mitigation for climate-neutrality by 2050 and enhanced climate change mitigation goals for 2030, as well as new CEAP. The action is designed in the context of IPA III Programming Framework in order to support its specific objectives in environment and climate change area and also to the Strategic Response of Türkiye by developing necessary administrative capacity at national and local levels and improving the environment and ensuring its preservation, with its special focus on local empowerment and engagement of all social groups, especially women, that will take the EU Gender Action Plan (GAP) III<sup>6</sup> into consideration during implementation.

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<sup>4</sup> <https://www.eesc.europa.eu/en/news-media/presentations/green-deal-action-plan-turkey>

<sup>5</sup> [https://www.sbb.gov.tr/wp-content/uploads/2024/06/Twelfth-Development-Plan\\_2024-2028.pdf](https://www.sbb.gov.tr/wp-content/uploads/2024/06/Twelfth-Development-Plan_2024-2028.pdf)

<sup>6</sup> [https://ec.europa.eu/international-partnerships/system/files/join-2020-17-final\\_en.pdf](https://ec.europa.eu/international-partnerships/system/files/join-2020-17-final_en.pdf)

## 2.2. Problem Analysis

The problems to be addressed in this Action are given below by two Areas of Support.

### **Area of Support No.1: Supporting the implementation of the Green Deal Action Plan of Türkiye with a special focus on Sustainable Product Initiative and Carbon Border Adjustment Mechanism (CBAM)**

EGD foresees a comprehensive set of new legislation in order to achieve a green transition across the entire economy. While as of 2026 EU's CBAM will impose financial liabilities on the carbon emissions embedded in imported goods, eco-design rules to be based on SPI will bring new market access rules in line with sustainability and circularity objectives. However, this evolving economic model will also give rise to a complex array of additional legislation aimed at addressing all dimensions of the green transition.

As a Customs Union partner, Türkiye must align with this new set of comprehensive legislation and adjust existing policies accordingly. Both public and private sector will need human resources equipped with the skills required to make and adopt the policies within the green transition process. Moreover, as the EU's largest supplier in proximity, the success of Türkiye's green transition in its industries will significantly contribute to the EU's sustainability goals.

However, this complex and comprehensive change in EU legislation will necessitate a mind shift in policy making and business development decisions. In that respect, there is a need to provide a comprehensive understanding of green transition to the public sector to ensure coherence among different policies in the direction of green transition. At the same time, explaining this complex regulatory framework with clear, actionable guidance is essential to help the private sector understand and comply with the interconnected regulations. In this context, the main objective under this Area of Support (AoS) will be to establish a holistic approach to EGD policies among relevant stakeholders. This includes enhancing capacity building, guiding the green transition, and facilitating the adaptation process within selected sectors.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

General Directorate of International Agreements and EU under The Ministry of Trade (MoT) will be the IBPM. MoT is the main coordinating body for alignment to EU technical legislation within the framework of the Customs Union and the coordinator for the Green Deal Action Plan. MoIT and MoEUCC are the main partners of MoT for the alignment and implementation of the main EGD legislation including CBAM and circular economy transition (circular economy transition being mainly under the responsibility of the MoEUCC). The action aims to build institutional capacity of both public and private stakeholders as relevant. Depending on the nature of activities, the stakeholders include but are not limited to relevant ministries namely; Presidency of Digital Transformation Office, Presidency of Strategy and Budget, Presidency of Finance Office, Presidency of Investment Office, Ministry of Industry and Technology, Ministry of Environment, Urbanization and Climate Change, Ministry of Treasury and Finance, Ministry of Energy and Natural Resources, Ministry of Agriculture and Forestry, Ministry of Labour and Social Security, Ministry of Transport and Infrastructure, Ministry of National Education, Ministry of Interior, Ministry of Justice and Ministry of Foreign Affairs, Turkish Accreditation Agency (TÜRKAK), Turkish Environmental Agency, Presidency of Climate Change. Furthermore, the project aims to provide guidance for green transition efforts of the private sector stakeholders, especially Small and Medium sized Enterprises (SMEs) through Business Associations, Exporters Unions and Chambers of Commerce. Last but not the least, universities and civil society organisations (CSOs) are also among the stakeholders. Among these stakeholders MoIT and MoT are the main stakeholders. MoIT is the responsible body for ESPR and MoT is responsible for coordination of Green Deal and the Customs Union.

### **Area of Support No.2: Promoting the implementation of the future National Circular Economy Strategy and Action Plan**

In Türkiye, there is a significant potential for scaling up and implementation of circular economy business models (e.g. industrial symbiosis, use of secondary raw materials, alternative fuels etc.) and adoption of technologies and processes for resource efficiency as analysed by the “Technical Assistance for Assessment of Türkiye’s Potential on Transition to Circular Economy Project (IPA II)” (DEEP Project). While municipalities and small-medium enterprises (SMEs) are the driving force of the economy, there are also large enterprises with regional presence that can take advantage of economies of scale for productivity and resource efficiency.

Despite the efforts of the Turkish government in strengthening the regulatory framework as well as raising awareness through the circular economy principles to improve integrated waste management and efficient resource use avoiding waste generation by sustainable production, long life-span product use, refusing, reducing and recycling of waste and other aspects of sustainable consumption and production remain as challenges due to lack of incentives provided across sectors.

Since 2019, Ministry of Environment, Urbanisation and Climate Change (MoEUCC) has been working on developing national circular economy principles after publication of 2015 EU CEAP. Through the DEEP Project a National Circular Economy Strategy and Action Plan (NCEAP) is currently being prepared as well as an implementation level needs assessment vis à vis the current institutional capacity level and needs, gaps and strengths is made.

Preliminary results indicate, the need for revision of existing legislation as well as new legislation to be drafted for alignment. Conclusions of Sectoral Impact Assessment Report the 7 key sectors with intense resource use and high environmental impact are: textile, plastics, packaging, electronics and ICT, batteries and vehicles, food, construction & demolition (C&D) and buildings. This AoS will focus on 6 sectors (excluding C&D sector as it is covered under 2022 AAP) to gain an overview of design, production, sustainable consumption, reduction, current collection, recycling and treatment systems and their outcomes, and to prepare roadmaps for these 6 key sectors that aims to contribute to transition to circular economy in line with the requirements of the related EU Directives (i.e. indicatively Batteries Regulation, End of Life Vehicle Directive, Waste Shipment Regulation, Waste Framework Directive). Implementation of the sectoral roadmaps in pilot cities will enable cooperation with different cities regarding priority sectors in other relevant municipalities, ensuring the evaluation of different waste streams with regards to separate collection, treatment, recycle and prevention. In pilot implementations, activities sharing of best practices of EU Countries (city based) with six pilot cities shall be organised, establishing local cooperation mechanisms with municipalities i.e. repair workshops, second hand shops, social initiatives to prevent food waste and wastage, organising awareness raising on implementation and dissemination activities (through trainings, informative documents, videos, workshops, meetings etc.). Social behaviour assessment for citizens on circular economy implementation (waste prevention, waste reduction, separate collection, recycling, etc.) will also be carried on.

The initiatives that are necessary to overcome any financial, legislative, technical and psychological barriers for increased effective implementation of circular economy, recycling of separately collected waste fractions need to be focused to this end, the capacities of national and local authorities in Türkiye need to be improved in the field of preventing and reducing of waste particularly revaluation of recyclables and circular economy.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

The MoEUCC is the main authority in Türkiye regarding the circular economy and waste management. General Directorate of Environmental Management under The MoEUCC will be the IBPM. Depending on the nature of activities the stakeholders include but are not limited to relevant ministries namely, the Ministry of Industry and Technology, the Ministry of Trade, the Ministry of Agriculture and Forestry, the Ministry of Treasury and Finance, Presidency of Strategy and Budget, the Ministry of Health, Turkish Statistical Institute, Turkish Environmental Agency, other public institutions -especially institutions within the Coordination



Board on Climate Change-, private sector stakeholders, especially Small and Medium sized Enterprises (SMEs) through Business Associations, Exporters Unions and Chambers of Commerce, municipalities, universities, provincial administrations, waste treatment facilities, headmen/muhtars, social cooperatives and civil society organisations (CSOs). The involvement of relevant CSOs is essential for AoS (2). Through regular project implementation meetings and activities designed, participation of CSOs shall be ensured.

### 2.3. Lessons Learned

A comprehensive and participatory approach (with public, private, local, social actors) with aspects such as legislation, administrative processes, and other branches of institutional capacity development is necessary, for better harmonisation and implementation.

Türkiye recognises the need for a better resource utilisation in the future. With the increasing global recognition of the benefits of circularity, Türkiye has also embarked on promoting the circular economy model. Subsequently, integrated waste management has gained considerable importance in recent years as one of the most important pillars of resource efficiency. This action will complement the current DEEP Project, which aims at establishing a National Circular Economy Strategy and Action Plan and mainly focuses on priority sectors of the CEAP of the EU. The project generated the lesson that, due to some data gaps, local sector analysis should be completed before the national based analysis, as a rationale for the city-scale in AoS2.

The project will also complement the former “Determination of Industrial Emission Strategy of Türkiye in Accordance with Integrated Pollution Prevention and Control (DIES) Project”, for the alignment to EU’s Industrial Emissions Directive and related Best Available Techniques Reference documents (BREFs) for reducing the environmental footprint of the industry. A similar relationship exists with “Technical Assistance for Development of End-of-Waste Concept in Türkiye” project due to the need of secondary materials use for such a decrease.

As a Customs Union partner and a candidate country, Türkiye has had MRV legislation for greenhouse gases in line with the EU MRV (*Commission Implementing Regulations (EU) 2018/2066 and 2018/2067*) since 2014 and an ETS mechanism will be established in the near future. The CBAM emissions monitoring, reporting and verification (MRV) rules will seek coherence and synergies with the MRV rules of the EU ETS system, but these rules are still to be adopted by the Commission. These will be relevant for third country operators because under the CBAM Regulation (Regulation 2023/956) third country operators may disclose the information on the verification of embedded emissions to an authorised CBAM declarant, who shall be entitled to use that disclosed information in order to fulfil its obligations under the Regulation. There is an opportunity to increase awareness of the third country operators with regard to the methodology for calculation and verification of embedded emissions, once adopted by the Commission.

There is still a lack of awareness and understanding in Türkiye about the legislative changes in the EU within the framework of EGD, as observed during the preparation and implementation of the GDAP and through communications with Specialized Working Groups (SWGs). The tendency not to change the status-quo both at the public and private sector level, could only be overcome by deep understanding of EU policies to justify the main reasoning behind the need for policy change and for adaptation to new economic reality. For instance, we have experienced that the position of the textile sector at the beginning of the DEEP project has evolved by the increase in the level of understanding about new EU policies in the textile sector.

It has also been observed from previous projects that the web pages need to be designed to serve as a concrete guidance for the private sector providing easy access. The reports of the lessons learned from study visits, sectoral assessment documents, results of the workshops, sectoral forums, videos of trainings, etc. need to be published, which may also provide useful information both for the public and private sector.

The action takes into account lessons learned during the legislative alignment process in the CU and aims to facilitate implementation of the GDAP in this regard. In a nutshell, the following needs are identified as lessons learned from the harmonization process and implementation of GDAP including NCEAP:

- Improved compliance with EU legislation
- Need for quick adaptation to the new rules brought about by the EGD
- Further improvement of institutional capacity on implementation both at central and local levels
- Enhanced capacity for service delivery and communication skills at local level
- Increase awareness and implementation capacity of private sector for supporting green and digital transition
- Providing easy access to useful information for the public and private sectors
- Improved dialogue and strengthened cooperation with the EU and strengthened communication across the levels of the government
- Engagement with National and Commercial Financial Institutions to streamline investments toward the green transition

### **3. DESCRIPTION OF THE ACTION**

#### **3.1. Intervention Logic**

The Overall Objective/Impact of this action is to support alignment of Türkiye with the European Green Deal (EGD).

The Specific Objective(s) (Outcomes) of this action are to:

1. Promote the implementation of the GDAP in line with EU's CBAM and SPI requirements.
2. Make Türkiye better equipped in its transition to a circular economy.

The Outputs to be delivered by this action contributing to the corresponding Specific Objectives (Outcomes) are:

- 1.1 contributing to Outcome 1 (or Specific Objective 1) Strengthened institutional capacity for policy making, action plans, and project formulation to support the green transition of the public and private sectors.
- 2.1 contributing to Outcome 2 (or Specific Objective 2) Supported implementation of the National Circular Economy Strategy and Action Plan.

#### **3.2 Indicative Activities**

Activities related to Output 1.1

Activity 1: Promoting the Implementation of the GDAP particularly in CBAM and SPI

This activity aims to foster a comprehensive understanding of the CBAM, the SPI, and all relevant European Green Deal (EGD) legislation among key institutions. In this context, it is planned to provide an in-depth assessment of anticipated EU policy and regulatory changes and their implications for Türkiye-EU trade. A sectoral mapping exercise will be undertaken to outline the critical steps each targeted sector (together with relevant public authorities and in consultation with the private sector) must take to achieve a green transition and maintain competitiveness within the Customs Union. Additionally, the specific measures required for each sector will be discussed in collaboration with key stakeholders to identify potential challenges, assess vulnerabilities - particularly for SMEs - and determine their capacity to meet EGD compliance standards.

The criteria for sector selection will prioritise new CBAM sectors in case of possible extension, as well as those highlighted in the 2024-2027 Work Plan for product-based eco-design rules.

Moreover, it aims to provide guidelines to the private sector that will lay down the main requirements for action in a simplified form with links to other sources of available and useful information and contact points for further details in areas such as: the measurement and reduction of greenhouse gas emissions for CBAM scope, eco-design rules in specific sectors, Industrial Emissions Directive and various additional pieces of legislation such as Corporate Sustainability Due Diligence, Deforestation Regulation, Waste Shipment Regulation etc.

The overarching goal of this activity is to increase public and private sector engagement in, and commitment to, the green transition while establishing a common understanding of the interconnections between various EGD regulations and funding opportunities. This will be achieved by building the necessary capacity to adopt and implement EGD policies, initiatives and projects, potentially through the establishment of expert pools through activities like focused training sessions.

Lastly, a web-based platform will be developed to provide consolidated information for each sector both for EGD legislation and new Turkish legislation. It will facilitate easy access to up-to-date information on regulatory changes and include best practices as well as provide comprehensive information and links to available resources to help businesses navigate the financial landscape and access the funding necessary for green transformation initiatives.

Activities related to Output 2.1:

Activity 2: Implementation of the National Circular Economy Strategy and Action Plan on 6 Key Sectors

This activity will support Turkish efforts for Climate Change Mitigation and integrated waste management through facilitating the transition to Circular Economy as well as improving and implementation of national waste policy and the relevant legislation. The implementation of the forthcoming National Circular Economy Strategy and Action Plan will be supported by addressing the six key sectors; textile, plastics, packaging, electronics and ICT, batteries and vehicles, C&D and buildings and food & biomass. This activity covers making necessary revisions in national circular economy legislation in line with EU policies based on legislative gap assessments, establishing a database regarding circular economy requirements for ensuring monitoring of these key sectors including data collection, verification and reporting, etc. It will also prepare sectoral circular economy implementation roadmaps that identify strategies and concrete actions for these six key sectors and implementing them in six cities and finally revising current National Circular Economy Strategy and Action Plan as per monitoring and evaluation results of the pilot implementations.

For each of the six sectors, the production, manufacturing technology, consumption, innovation, waste management (prevention, minimisation, recycling, disposal etc.) capacities will be evaluated in selected six cities. For instance, in one city that is selected among 6 cities, 1 leading sector in that city will be studied and evaluated. The cities will be selected by focusing on the production, amount of waste, intensity of industrialisation, consumption patterns and volume of trade.

In the pilot implementations, involvement of municipalities will be key. Moreover, links with the cities that are part of the Covenant of Mayors for climate and energy will be created to the extent possible. Implementations in pilot cities will also enable cooperation with different cities regarding priority sectors in other relevant municipalities, so that different waste streams could be evaluated with regards to separate collection, treatment, recycle and prevention. In pilot implementations, activities such as sharing best practices of EU Countries (city based) with six pilot cities, establishing knowledge hubs in pilot cities that provide cooperation mechanisms and networking within private sector, establishing local cooperation mechanisms with municipalities i.e. repair workshops, second hand shops, social initiatives to prevent food waste and wastage, organizing capacity building, awareness raising and dissemination activities (through trainings, informative documents, videos, workshops, meetings etc.) in six cities are planned. Social behaviour assessment for citizens on circular economy implementation will also be carried on. In addition to monitoring of 6 key sectors in pilot areas, following the publication of NCEAP in 2024, the MoEUCC will monitor the

progress of implementation of each action. As a further contribution this activity will create the necessary know how for Türkiye to be able to provide the “Circular material use rate” and the data for calculation of the indicator for European Environment Agency (EEA)’s State and Outlook for Europe’s Environment Report (SOER).

### **3.2. Mainstreaming**

#### **Environmental Protection, Climate Change and Biodiversity**

The Action directly relates to environment and climate issues at the national and local levels. It will improve the technical capacities and quality of information necessary for the further progress in the implementation of EU Environment and Climate Change legislation as well as EGD and thus directly contributes to improved environmental protection (including biodiversity) and climate action.

Furthermore, the project aims to disseminate information and build the capacity of private sector stakeholders that will facilitate green transition of the private sector. Meanwhile, in all events such as trainings, seminars, workshops etc., attention will be paid to the greening of events.

Thus, these policy changes and green transition of the private sector will contribute to improved environmental protection, climate action and biodiversity. This will also bring benefits in relation to disaster risks linked with climate change.

#### **Gender equality and empowerment of women and girls**

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1. This implies that gender mainstreaming is an important aspect in this action. The European Commission Gender Equality Strategy “A Union of Equality: Gender Equality Strategy 2020-2025” applying to women and men, girls and boys, in all their diversity, together with the “EU Gender Action Plan III”, are considered as important references, as well as the 12<sup>th</sup> NDP necessitating equal opportunities between men and women. Women’s empowerment and participation is prominent in NDP. Upcoming policies under the EGD, such as the EU Strategy on Climate Adaptation, can impact genders unequally. As regards to climate change, the role of young women in particular has been remarkable in leading the push for change. On the other side, climate change is not gender neutral. Climate change impacts men and women differently, largely due to their gender-differentiated relative powers (real and perceived according to gender norms), roles and responsibilities at household and community levels. Addressing the gender dimension can therefore have a key role in leveraging the full potential of these policies. The AD ensures that both women and men can provide inputs, access, and participate in action activities. It will be ensured that sex-disaggregated data is collected regarding project activities and outputs, where applicable, and be presented in the inception/progress/interim/final reports and at Steering Committees and during monitoring missions. In the Log Frame, sex-disaggregated indicators will be set, where appropriate. Gender mainstreaming is targeted by concrete actions like:

- diagnosing the challenges in the context described above and the related disadvantaged groups (whenever possible, at the beginning of the activities)
- sex-disaggregated data collection in the activities of the action where applicable in order to improve data collection on the gender-differentiated impacts of climate change and environmental degradation to inform gender-responsive policies and action.
- systematically including sexual equality perspective in outputs (including, inter alia, contributions to increase resilience of disadvantaged groups against all of the identified challenges where applicable), ensuring men-women balanced representation of stakeholders throughout the action and in every kind of events of the activities including events that are organised in all stages of policy design and trainings,
- ensuring and/or encouraging balanced involvement of women and men in implementation and management of the activities like in coordination units and technical assistance teams.
- preparing the basis for new circular economy models - like reuse and repair- complementing SPI’s approach of durability, which may provide new employment opportunities for women.

Some outputs may also lead women to have equal opportunities to thrive in society and the economy. Thus, this action will contribute to gender mainstreaming with a special focus on women’s empowerment.

### Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D0. This implies that the action is not considered relevant for inclusion of persons with disabilities. Yet the disabled people shall be provided the same level of access to the project as all other participants, via a sensitive design of activities.

### Vulnerable Groups

Since this Action under “Window 3, Thematic Priority 1 - Environment and Climate Change” will deal with environmental issues targeting a general improvement of the key sub-sectors, its outcomes will be beneficial to all citizens including underprivileged social groups. Further improvements in environmental protection (waste management, climate change) and transition to circular economy models will contribute to poverty reduction and increase the potential for economic activity.

### 3.3. Risks and Assumptions

Category	Risks	Likelihood (High/Medium/Low)	Impact (High/Medium/Low)	Mitigating measures
3-Risk related to people and the organisation	Inadequate representation of experts from stakeholders in project activities	M	H	Regular coordination with stakeholders will be provided.
4-Risk related to legality and regularity aspects	Failure to ensure timely alignment to the new EU legislation within the sustainable product initiative	M	H	The activities planned will also focus on the need and the reasoning behind the timely alignment.
3-Risk related to people and the organisation	Insufficient implementation capacity of local authorities in accordance with project outcomes	M	H	DEEP Project outputs and supports will be put in practice.
5-Risk related to communication and information	Opposition to project from several target groups benefitting from linear economy model	H	M	Effective and widespread awareness activities will be applied.
1-Risk related to the external environment	High cost of transition to circular economy	H	M	Efficient incentive mechanisms will be encouraged.

## **External Assumptions**

Outcome related assumptions are:

- Continuous commitment, steered and coordinated at the highest level to address the key priorities under environment and climate change specifically of Circular Economy and requirements of CBAM
- Political determination is maintained to enact respective regulatory measures
- Stakeholders' dedication to participate and cooperate throughout the actions
- Necessary domestic financial and administrative resources are effectively and efficiently mobilised
- The businesses in Türkiye are part of the value chains in the EU market. Shift to circular economy in the EU will have a domino effect on such businesses

Output related assumptions are:

- Strong stakeholder coordination, cooperation and willingness during action implementation
- Businesses and local authorities would be willing and able to implement circular economy
- Relevant staff trained and continue working in the field in which they were trained
- Awareness activities receive both public and private attention

### 3.4. Indicative Logical Framework Matrix

Results	Results chain: Main expected results [maximum 10]	Indicators [it least one indicator per expected result]	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
<b>Impact</b>	To promote alignment of Türkiye with the EGD	1 Percentage of implementation level of the actions of the GDAP (updated version in 2024)	1 0 (2024)	1 60% (by the end of the implementation)	1 GDAP Annual Reports of Türkiye	<i>Not applicable</i>
<b>Outcome 1</b>	Implementation of the GDAP promoted in alignment with EU's CBAM and the SPI requirements	1.1 Number of sectors prioritized and supported for green transition in line with EU's CBAM and the SPI requirements 1.2 Number of institutions with amended strategic plans according to results of the mapping exercise	1.1 0 (2024)  1.2 Not applicable (2024)	1.1 6 (by the end of the implementation)  1.2 5 (by the end of the implementation)	1.1 GDAP Annual Reports of Türkiye	<ul style="list-style-type: none"> <li>- Political determination is maintained to enact respective regulatory measures</li> <li>- Continuous commitment, at the highest level to address the key priorities of Circular Economy and requirements of CBAM</li> <li>- Stakeholders' dedication to participate and cooperate throughout the actions</li> <li>- Necessary domestic financial and administrative resources are effectively and efficiently mobilised</li> </ul>

<p><b>Outcome 2</b></p>	<p>Türkiye better equipped for its transition to a circular economy</p>	<p>2.1 Number of new sectoral policies adopted to further align with EU circular economy policies</p> <p>2.2 Number of sectors prioritized and promoted for transition to a circular economy at local level</p>	<p>2.1 3 (2024)</p> <p>2.2 0 (2024)</p>	<p>2.1 6 (by the end of the implementation)</p> <p>2.2 6 (by the end of the implementation)</p>	<p>2.1 MoEUCC records</p> <p>2.2 Project Reports</p>	<ul style="list-style-type: none"> <li>- Continuous commitment, steered and coordinated at the highest level to address the key priorities under environment and climate change specifically of Circular Economy</li> <li>- Political determination is maintained to enact respective regulatory measures</li> <li>- Stakeholders' dedication to participate and cooperate throughout the actions</li> <li>- Necessary domestic financial and administrative resources are effectively and efficiently mobilised</li> <li>- The businesses in Türkiye are part of the value chains in the EU market. Shift to circular economy in the EU will have a domino effect on such businesses</li> </ul>
<p><b>Output 1 related to Outcome 1</b></p>	<p>1.1 Strengthened institutional capacity for policy making, action plans, and project formulation to support the green transition of the public and private sectors</p>	<p>1.1.1. Number of Sectoral Workshops organized</p> <p>1.1.2 Number of sectoral guidelines produced</p> <p>1.1.3 Number of Industry and sectoral seminars to provide input and discuss findings of reports and studies and seek contributions on strategies to prepare for EGD legislation.</p> <p>1.1.4 Sex disaggregated number of trainers trained from public sector</p>	<p>1.1.1 0 (2024)</p> <p>1.1.2 0 (2024)</p> <p>1.1.3 0 (2024)</p>	<p>1.1.1 6 (by the end of the implementation)</p> <p>1.1.2 6 (by the end of the implementation)</p> <p>1.1.3 6 (by the end of the implementation)</p>	<p>1.1.1 Project Reports</p> <p>1.1.2 Project Reports</p> <p>1.1.3 Project Reports</p> <p>1.1.4 Project Reports</p>	<ul style="list-style-type: none"> <li>- Strong stakeholder coordination, cooperation and willingness during action implementation.</li> <li>- Relevant staff trained and continue working in the field they trained</li> <li>- Awareness activities receive public and private attention</li> </ul>



		<p>1.1.5 Sex disaggregated number of trainers trained from private sector</p> <p>1.1.6 A web-based platform established</p> <p>1.1.7. Presence of strategically mapped knowledge on current situation and needs</p> <p>1.1.8. Number of projects developed by the private sector for green transition based on mapping exercise</p>	<p>1.1.4 0 (2024)</p> <p>1.1.5 0 (2024)</p> <p>1.1.6 No (2024)</p> <p>1.1.7. No</p> <p>1.1.8. Not applicable (2024)</p>	<p>1.1.4 indicatively 100 (min 50% women) (by the end of the implementation)</p> <p>1.1.5 indicatively 150 (min 50% women) (by the end of the implementation)</p> <p>1.1.6 Yes (by the end of the implementation)</p> <p>1.1.7 Yes (by the end of the implementation)</p> <p>1.1.8. Indicatively 5 for each selected sector</p>	<p>1.1.5 Project Reports</p> <p>1.1.6 Project Reports</p> <p>1.1.7 Project Reports</p> <p>1.1.8. Project Reports, MoT Responsible Platform records and all other relevant platforms like MoI records</p>	
<p><b>Output 1 related to Outcome 2</b></p>	<p>2.1 Supported implementation of the National Circular Economy Strategy and Action Plan</p>	<p>2.1.1 Number of revised national circular economy legislation in line with EU policies</p> <p>2.1.2 Number of Sectoral Circular Economy Implementation Roadmaps prepared at local level</p> <p>2.1.3 Number of Cities that Sectoral Circular Economy Roadmaps implemented</p>	<p>2.1.1 0 (2024)</p> <p>2.1.2 0 (2024)</p> <p>2.1.3 0 (2024)</p>	<p>2.1.1 6 (by the end of the implementation)</p> <p>2.1.2 6 (by the end of the implementation)</p> <p>2.1.3 6 (by the end of the implementation)</p>	<p>2.1.1 Project Reports</p> <p>2.1.2 Project Reports</p> <p>2.1.3 Project Reports</p>	<ul style="list-style-type: none"> <li>- Strong stakeholder coordination, cooperation and willingness during action implementation</li> <li>- Businesses and local authorities would be willing and able to implement circular economy</li> <li>- Relevant staff trained and continue working in the field they trained</li> <li>- Awareness activities receive public and private attention</li> </ul>

		<p>2.1.4 Status of a database regarding circular economy requirements for ensuring monitoring of the key sectors established</p> <p>2.1.5 Status of Circular Economy National Strategy and Action Plan revision as per monitoring and evaluation results of the pilot implementations</p>	<p>2.1.4 Not available (2024)</p> <p>2.1.5 Not available (2024)</p>	<p>2.1.4 Established (by the end of the implementation)</p> <p>2.1.5 Revised (by the end of the implementation)</p>	<p>2.1.4 Project Reports</p> <p>2.1.5 Project Reports</p>	
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## **4. IMPLEMENTATION ARRANGEMENTS**

### **4.1. Financing Agreement**

In order to implement this action, it is envisaged to conclude a financing agreement with the Republic of Türkiye.

### **4.2. Indicative Implementation Period**

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 72 months from the date of conclusion of the financing agreement.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

### **4.3. Implementation Modalities**

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures<sup>7</sup>.

#### **4.3.1. Indirect Management with an IPA III beneficiary**

This action will be implemented under indirect management by the Republic of Türkiye.

The Managing Authority responsible for the execution of the action is Ministry of Environment, Urbanisation and Climate Change (MoEUCC), General Directorate of European Union and Foreign Relations (DGEUFR). The managing authority shall be responsible for legality and regularity of expenditure, sound financial management, programming, implementation, monitoring, evaluation, information, visibility and reporting of IPA III activities.

The Managing Authority shall rely on sectoral expertise and technical competence of the following intermediate bodies for policy management: General Directorate of International Agreements and EU of the Ministry of Trade (MoT) and General Directorate of Environmental Management of Ministry of Environment, Urbanization and Climate Change (MoEUCC). They shall ensure sound financial management of the action.

Budget implementation tasks such as calls for tenders, calls for proposals, contracting, contract management, payments and revenue operations, shall be entrusted to the following intermediate body for financial management: Ministry of Environment, Urbanisation and Climate Change (MoEUCC), General Directorate

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<sup>7</sup> [EU Sanctions Map](#). Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

of European Union and Foreign Relations (DGEUFR), Department of EU Investments (DoEUI). It shall ensure legality and regularity of expenditure.

#### **4.3.2. Changes from indirect to direct management (and vice versa) mode due to exceptional circumstances**

If the implementation modality under indirect management as defined in section 4.3.1 cannot be implemented due to circumstances beyond the control of the IPA III beneficiary, the modality of implementation can be changed either to Indirect Management with Entrusted Entity(ies) and/or Direct management (procurement).

#### **4.4. Scope of geographical eligibility for procurement and grants**

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission’s authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

#### **4.5. Indicative Budget**

<b>Indicative Budget components</b>	<b>EU contribution (amount in EUR)</b>
<b>Methods of implementation</b> – cf. section 4.3	
<b>Outcome 1: “Implementation of the GDAP promoted in alignment with EU’s CBAM and the SPI requirements”</b> composed of	<b>2 000 000</b>
Indirect management with the Republic of Türkiye – cf. section 4.3.1, and	2 000 000
<b>Outcome 2: “Türkiye better equipped for its transition to a circular economy”</b> composed of	<b>4 000 000</b>
Indirect management with the Republic of Türkiye – cf. section 4.3.1	4 000 000
<b>Indirect management with the Republic of Türkiye</b>	<b>6 000 000</b>
<b>Evaluation</b> – cf. section 5.2 <b>Audit</b> – cf. section 5.3	may be covered by another Decision
<b>Strategic Communication and Public Diplomacy</b> – cf. section 6	will be covered by another Decision
<b>Totals</b>	<b>6 000 000</b>

#### **4.6. Organisational Set-up and Responsibilities**

The Managing Authority (MA) in the field of Environment and Climate Change is the DG of European Union and Foreign Affairs (DGEUFR) under MoEUCC. MoEUCC is also the coordinator for most of the sectors under Chapter 27 Environment and Climate Change. The IBPMs of the activities are General Directorate of International Agreements and EU of the Ministry of Trade (MoT) and General Directorate of Environmental Management of Ministry of Environment, Urbanization and Climate Change (MoEUCC).

Budget implementation tasks such as calls for tenders, calls for proposals, contracting, contract management, payments and revenue operations, shall be entrusted to the following intermediate body for financial management (IBFM): Department of European Union Investments under MoEUCC/DGEUFR. It shall ensure legality and regularity of expenditure.

Each activity defined in this action document will establish its management units for a smooth implementation of the activities. Day-to-day management and coordination of the activities will be carried out by the Action Coordination Units (ACU). Activities will be coordinated with ACU which is a body bringing the IBPMs and IBFM together with the TA team, regarding all of the project activities.

A Steering Committee (SC) will be established for each activity and will be mainly composed of the representatives of the MA, IBPMs, IBFM, main stakeholders of the activities and additional stakeholders as required, National IPA Coordinator (NIPAC), Presidency of Strategy and Budget as well as Delegation of the European Union to Türkiye (EUD). The SC will act as the advisory body that will provide high-level strategic guidance and oversight on activity implementation. SC will be gathered at regular intervals and additionally whenever deemed necessary.

Furthermore, a Sectoral Monitoring Committee (SMC) which is one of the highest decision taking platforms in terms of effective management of the funds provided by the EU, will meet regularly to solve the problems encountered during the programming, implementation and monitoring and give recommendations for effective utilisation of funds. SMC will be mainly composed of the representatives of the Commission/EU Delegation to Türkiye, MA, IBPMs, IBFM, the stakeholders of the activities, the Presidency of Strategy and Budget, NIPAC and if necessary relevant line ministries.

The functions of Sectoral Monitoring Committee are as follows:

- Review at each meeting the progress made towards achieving the specific targets of the Programme on the basis of the basic documents.
- Examine at each meeting the results of implementation, particularly the achievement of the targets set and measures and interim evaluations.
- Examine the annual and final reports on implementation of the action document.

SMC will meet at least twice a year at the initiative of MoEUCC. The issues to be followed up will cover the period between two Committee meetings and the Committee Members will be informed about the current situation with regards to those issues.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action.

The Managing Authority and IBPMs/Stakeholders of the activities are given below:

<b>Outcome No:</b>	<b>Managing Authority</b>	<b>IBPM and Stakeholders</b>
1	Ministry of Environment, Urbanization and Climate Change (MoEUCC) / General Directorate of EU and Foreign Relations (DGEUFR)	IBPM: General Directorate of International Agreements and EU/Ministry of Trade (MoT)
2	Ministry of Environment, Urbanization and Climate Change (MoEUCC) / General Directorate of EU and Foreign Relations (DGEUFR)	IBPM: General Directorate of Environmental Management / Ministry of Environment Urbanization and Climate Change

## 5. PERFORMANCE MEASUREMENT

### 5.1. Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the logframe matrix. The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

Roles and responsibilities for data collection, analysis and monitoring:

- Monitoring tasks undertaken by the implementing partners/ beneficiary country, under the coordination of NIPAC Office, and NAO Office for financial monitoring, will consist of collecting and analysing data aiming at informing on the use of resources and progress towards planned results, feeding the management of the action's decision-making processes.
- Monitoring tasks undertaken by the EU Delegation shall complement the implementing partners'/ beneficiary country's monitoring system, especially in key moments of the action cycle. It will also support follow-up of recommendations stemming out of external monitoring and will be used for informing EU management. This monitoring could take different forms and methodologies (meetings with implementing partners, action steering committees, on the spot checks ...), to be decided based on specific needs and resources at hand. Reporting will be done according to methodologies and tools included in DG NEAR guidelines on linking planning/programming, monitoring and evaluation, including the use of standard checklists.

Both types of internal monitoring are meant to inform and provide support to external monitoring:

- External monitoring / Results Oriented Monitoring (ROM)

The Commission and/or NIPAC may undertake additional project monitoring in line with the European Commission rules and procedures set in the Financing Agreement through independent consultants recruited directly by the Commission/NIPAC for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission/NIPAC for implementing such reviews). These reviews might be composed of monitoring of the action, results data collection or any other task that is identified in the most recent EC guidelines.

The statistical and monitoring systems as well as the quality of official data in the policy field covered have been assessed. This assessment has fed into the design of the action as follows:

- **Enhanced Data Collection:** By improving data collection methods and ensuring data accuracy, we will be better equipped to monitor progress towards EGD objectives.
- **Target Setting:** Based on the assessment, specific targets aligned with EGD standards have been set, providing clear milestones for our actions.
- **Policy Integration:** The findings have been integrated into policy frameworks, ensuring that decisions are based on reliable data and contribute directly to EGD goals.
- **Transparency, Accountability and Continuous Improvement:** Ongoing monitoring systems will be improved to track our progress and accountability towards EGD alignment.

These steps ensure that the work will be grounded in robust data and will effectively contribute to the overarching objectives of the EGD.

## 5.2. Evaluation

Having regard to the nature of the action, evaluation(s) may be carried out for this action or its components by the beneficiary via independent consultants. The evaluations will be carried out as prescribed by the DG NEAR guidelines on linking planning/programming, monitoring and evaluation.

The evaluation reports shall be shared with the partner country and other key stakeholders following the best practice of evaluation dissemination.<sup>8</sup> The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

## 5.3. Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

## 6. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

All entities implementing EU-funded external actions have the contractual obligation to inform the relevant audiences of the Union's support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. To that end they must comply with the instructions given in the 2022 guidance document [Communicating and raising EU visibility: Guidance for external actions](#) (or any successor document).

This obligation will apply equally, regardless of whether the actions concerned are implemented by the Commission, the partner country, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU Member States. In each case, a reference to the relevant contractual obligations must be included in the respective financing agreement, procurement and grant contracts, and contribution agreements.

## 7. SUSTAINABILITY

Environment and Climate Change has a key role in any area of development. Investments in this sector will have impact on economic and social life of the country, on the administrative effectiveness and efficiency. Progress under this thematic priority will contribute to the accession perspective of the country as well as its achievement of SDGs. Therefore, the action has the potential to trigger subsequent further efforts towards the objectives of Chapter 27 and the SDGs. An important element of sustainability is the political commitment to the EU acquis and vision, where the EGD perspectives are important elements. With the new legislation issued by the EU within the scope of the EGD, sustainability and circularity will become a rule for entering the EU market. These legislative changes considerably affect Türkiye's exports to the EU and the integration provided under the scope of the Customs Union (CU). Türkiye should therefore implement the required harmonization and adaptation policies, keeping in mind legislative changes unveiled within the context of the EGD, in its capacity as the candidate country and CU partner. It is critical for Türkiye to adopt these policies in terms of both maintaining its trade relations with the EU in a sustainable and competitive manner and complying with environmental targets. In this sense, the action supports the efforts to attain the goals of this perspective. Moreover, the action will promote Türkiye's adherence to the Paris Agreement, and other international accords and shared objectives. On the other hand, the activities in this action are supported with national policy and strategies which strengthen the sustainability of the achieved outcomes. The action is expected to impact

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<sup>8</sup> See best [practice of evaluation dissemination](#)

on the operational procedures and on the strategic visions, on the knowledge and on the motivation of involved people, on the physical and information resources, creating different sustainability vectors, the synergy of which will ensure the long-term impact of the EU funding. Thus, the action is foreseen to have an important and sustainable impact. Under the coordination of the MA, the action is foreseen to be executed in line with the required sustainability measures.