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4th Working Group Workshop 5 March 2018, Bilkent Hotel, Ankara

Legal analysis of Low Carbon Development: EU and Turkish relevant legislation

Alessandra Barreca-EU Legal Expert
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05 March 2018-Ankara





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Purpose and Outline

- Gap analysis of the Turkish LCD legal system with respect to the EU applicable Acquis: presentation of preliminary results
- Focus on EU legal framework
- Focus on Turkish legal framework
- Outlook on next activities and goals



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...recalling that



consistency

NATIONAL LEGAL FRAMEWORK

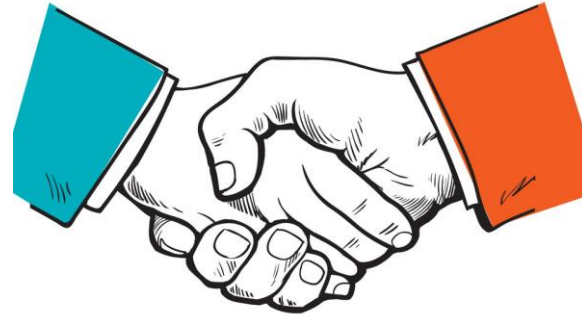




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LCD: not a self standing policy

Mitigation of GHG emissions



- Lowering dependence on fossil fuels
- Prudent use of natural resources
- Biodiversity & human health protection
- *Green* economic growth
- Innovation and competitiveness
- Sustainable production & consumption patterns



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Technical Assistance for Developed
Analytical Basis for Formulating
Strategies and Actions towards
Low Carbon Development
TR2013/0327.05.01-01/001

EU 2050 Roadmap: an integrated strategy

**INTERSECTORAL
TARGET**

-80% GHG emissions by 2050 (compared to 1990 levels)

ENERGY

TRANSPORT

INDUSTRY

AGRICULTURE

RENEWABLES

EFFICIENCY

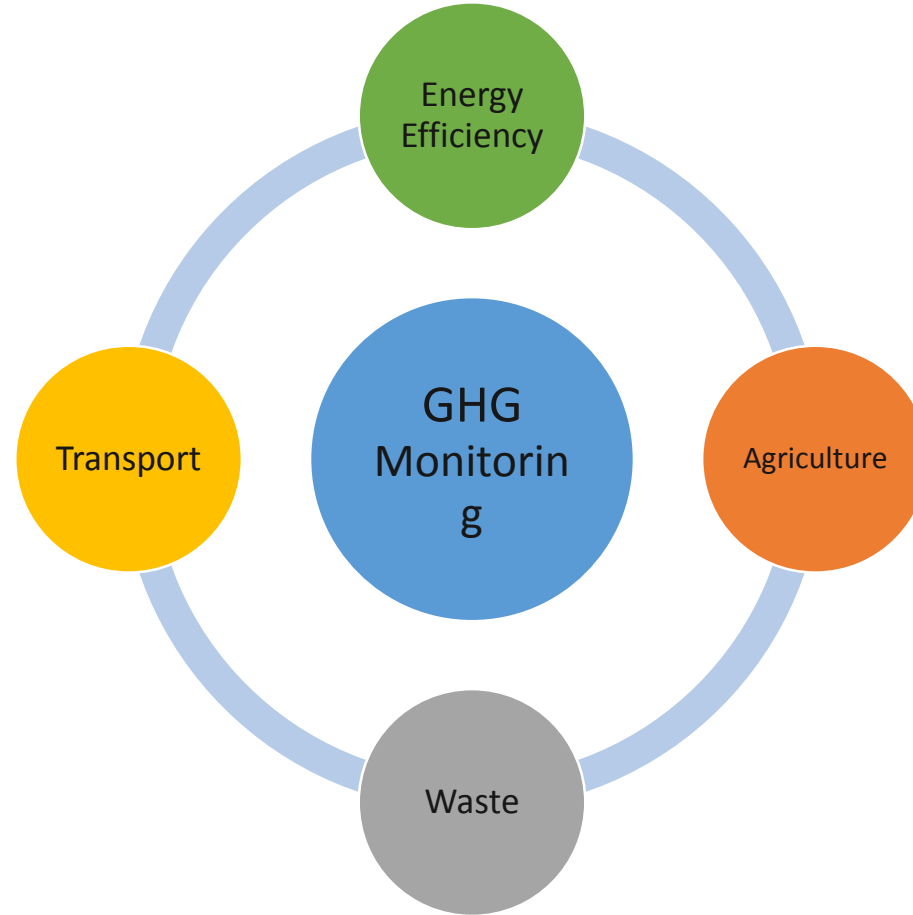
**PRODUCTS + SERVICES +
BUILT IN ENVIRONMENT**





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Legislation directly dealing with LCD focus on...





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Legislative Tool Comparision

LEGISLATIVE SOURCES & HIERARCHY

	EU	Turkey
Primary Legislation	Treaties	Constitution
	International Agreements	Law & International Treaties & Decree with the effect of Law
	General principles of Union law	
Secondary Legislation	Regulations	Regulations
	Directives	By-Law
	Decisions	Communiques, Decisions etc.
	Recommendations and opinions (unbinding)	



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Terminology Problem

By-Law

Regulation



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GHG Monitoring





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EU GHG Monitoring: Regulation 525/2013/EU

- Establishes a mechanism for monitoring and reporting GHG emissions and other information relevant to climate change
- National Inventories
- National Communications
- Article 4: Member States shall develop LCD strategies to report their progresses in meeting mitigation goals



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Monitoring and reporting greenhouse gas emissions in Turkey

Legislation in EU	Equivalent legislation in Turkey	
Regulation 525/2013/EU	By-Law on Monitoring of Greenhouse Gas Emissions	The purpose is to set forth the procedures and principals for monitoring, verifying and reporting of greenhouse gases arising from the facilities performing the activities listed in and to regulate liabilities of verification institutions and enterprises.
	Communiqué on Monitoring and Reporting of Greenhouse Gas Emissions	Sets forth the procedures and principals for greenhouse gases (“GHG”) arising from the Facilities performing the activities listed in Regulation. Additionally main principals for monitoring and reporting of emission activity data, monitoring plans and technical points of these plans, procedures and standards concerning calculation and measurement of emissions, management & control of activity data, reporting conditions are regulated



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Energy Efficiency





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EU energy efficiency relevant Acquis

- The framework: EU Directive 2012/27
- Energy performance of buildings: EU Directive 2010/31
- Eco design requirements for energy-related products: EU Directive 2009/125
- Energy labelling of energy-related products: EU Regulation 2017/1369



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EU EE framework: goals and means



- Reducing primary energy consumption, decreasing energy imports, reducing GHG emissions, boosting innovation, technology and economic competitiveness (EE target at 2020: +20%EE; EE target at 2030: +27%EE with view to raise ambition at 30%)
- Adopt national EE Action Plans (supported by adequate implementing measures)
- Provide customers with energy audit findings (systematic procedure to map energy consumption profile of buildings, installations and public or private services to identify cost-effective energy savings opportunities)
- Consumer behavioural change through education & information (smart metering and transparent billing, fiscal incentives, finance and grants)
- Make Public Bodies play an exemplary role (in purchasing products and in renovating buildings)





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EE in buildings

(framework + dedicated legislation)



- **Goal: improvement of *energy performance* of buildings** (calculated/measured amount of energy needed to meet energy demand associated with typical use of building (heating-cooling-ventilation-cooking-hot water...) **and reaching cost-optimal levels** (energy performance level leading to lowest costs during life-cycle)
- **Setting common methodology to calculate energy performance of buildings**
- **Apply minimum requirements for energy performance of buildings, building elements and technical building systems**
- **Adopt Building Regulations and Codes promoting renewable energy for heating and cooling and energy efficiency measures**
- **Increase nearly zero-energy buildings (National Plans)**
- **Establish common energy certification of buildings system** (accreditation of independent, qualified experts)
- **Ensure regular inspection of heating/cooling systems**





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EE in products

- Directive 2009/125/EC on **Ecodesign** of energy-related products (windows, insulation materials, water-using products such as shower heads and taps): calculate and reduce the environmental impacts of these products, ensure energy savings during their use
- Assess **environmental performance and ecological profile** of energy-related products placed on the market and ensure consumer information
- Regulation 2017/1369 on energy labelling: energy-related products labelled according to their energy efficiency (energy and other resources consumption)
- Uniform criteria and scale for labelling
- Consumer information
- Market surveillance



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Drivers of government energy efficiency policies

Climate change

Contribute to global mitigation and adaption efforts

Meet international obligations under the UN Framework Convention on Climate Change UNFCCC

Meet supranational regulations such as the EU accession requirements or directives

Source: IEA (2010) Energy Efficiency Governance Handbook, Second Edition, p.10-11
http://www.iea.org/publications/freepublications/publication/gov_handbook-1.pdf



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Turkey-Energy Efficiency

• Legislation in EU

Equivalent legislation in Turkey

Directive 2012/27/EU on energy efficiency

Energy Efficiency Law No. 5627

Directive 2010/31/EU on the energy performance of buildings

By-Law on the energy performance of buildings

Directive 2009/125/EU on establishing a framework for the setting of ecodesign requirements for energy-related products

By-Law on the eco-design for energy-related products (enerji ile ilgili ürünlerin çevreye duyarlı tasarımına ilişkin yönetmelik)

Regulation 2017/1369/EU on setting a framework for energy labelling

By-Law on the indication of labelling and standard product information of the consumption of energy and other resources by products (ürünlerin enerji ve diğer kaynak tüketimlerinin etiketleme ve standart ürün bilgileri yoluyla gösterilmesi hakkında yönetmelik)



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Other Related ...

- By-Law for supporting energy efficiency in small and medium-sized enterprises, including training, audit and consultancy services
- By-Law on energy efficiency of the utilisation of energy resources and energy.



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Renewable Energy-Transport & Agriculture





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Renewable Energy-Transport & Agriculture: the case of biofuels and renewable liquids and gaseous fuels

- Use of agricultural material (manure, organic waste, biomass) holds great potential for biogas and biofuels production → high GHG emissions saving potential+sustainable development and income opportunities for farmers
- Directive 2009/28/EC on the promotion of renewable energy+Directive 98/70/EC as amended on quality of petrol and diesel
- Goal: reducing GHG emissions from transport through changes in fuel composition
→ Gradual mandatory reduction of life cycle GHG emissions/unit of energy from fuel put on suppliers
- Introducing fuel quality standards and fuel quality monitoring system based on common procedures for sampling and testing
- Introducing monitoring and reporting of *life cycle GHG emissions* (i.e.: all net emissions that can be assigned to the fuel or energy supplied including all stages from extraction or cultivation, including land use changes, transport and distribution, processing and combustion, irrespective of where those emissions occur)



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- Increasing worldwide demand for biofuels → Need to discourage land conversion (indirect land use change) and/or destruction

SUSTAINABILITY CRITERIA FOR BIOFUELS

- Biofuels may count towards reductions in life cycle of GHG emissions only if:
 - ✓ No use of raw material coming from land having high biodiversity value (primary forest and other wooded land of native species);
 - ✓ No use of raw material from designated areas (areas designated for purposes of nature/ecosystems/species protection and conservation);
 - ✓ No use of raw material from highly biodiverse grassland;
 - ✓ No use of raw material from land with high carbon stock (wetlands, continuously forested areas);
 - ✓ No use of raw material from peatland
 - ✓ Produced benefiting from direct support schemes to farmers in accordance to EU applicable legislation





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To complete...

- Directive 2014/94/EU (adopted within *Clean power for transport* package) on deployment of alternative fuels infrastructure
- Develop national policy frameworks to ensure development of market for alternative fuels in transport sector and deployment of necessary infrastructures for fuels recharging
- Information to consumers
- Accessibility
- Non discriminatory prices



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Renewable Energy

Transport & Agriculture: the case of biofuels

- Biodiesel : the name given to a fuel produced by some chemical processes from vegetable oils such as soybean, rapeseed, sunflower seed, cotton seed, corn, crambe, peanut, sesame, opium seed, or from animal fats.
- Biodiesel is used as an alternative fuel to petrodiesel



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Renewable Energy Transport & Agriculture: the case of biofuels



Legislation in EU

Directive 2009/28/EC on the promotion of renewable energy

Equivalent legislation in Turkey

Act No. 5346 on Utilization of Renewable Energy Sources for the Purposes of Generating Electrical Energy (Renewable Energy Law)

- investments for energy generation facilities, procurement of electro-mechanic systems within the country, research, development and production investments concerning solar energy units, and research and development investments for **biomass energy**

Act No. 5627 on Energy Efficiency

On an industry specific level, a regulation within the Act lays down the principles and procedures relating to increasing the efficiency of electric generation plants and transmission and distribution networks, demand side management, utilisation of waste heat in thermal plants, and it encourages the **blending of fossil fuel distribution with fuels such as biofuel and hydrogen.**





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Renewable Energy Transport & Agriculture: the case of biofuels

Legislation in EU

Directive 98/70/EC of the European Parliament and of the Council of 13 October 1998 relating to the quality of petrol and diesel fuels, amended by Directive 2003/17/EC of the European Parliament and of the Council of 3 March 2003

Equivalent legislation in Turkey

- **By-Law on environmental effects of petrol and diesel types (benzin ve motorin türlerinin çevresel etkilerine dair yönetmelik) (Official Gazette 1.4.2017 No: 30025)**
- Petroleum Market Law (PML) Articles 2/1/5, 4/4/1, 9/6, 13/2, 22/2
- By-law on Technical Criteria to be Applied at Petroleum Market (By-law on Technical Criteria)
- By-Law on Control of Air Pollution Arising from Heating. (Article 5)
- Communique' on blending of biofuel to diesel (**motorin türlerine biodizel harmanlanması hakkında tebliğ**)(Entered into force **1.1.2018**)



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Renewable Energy

Transport & Agriculture: the case of biofuels



Technical Assistance for Developed
Analytical Basis for Formulating
Strategies and Actions towards
Low Carbon Development
TR2013/0327.05.01-01/001

Legislation in EU

Directive 2014/94/EU on the deployment of alternative fuels infrastructure

Equivalent legislation in Turkey

No direct regulation.

- **By-Law on manufacturing, changing and installation of vehicles (araçların imal, tadil ve montajı hakkında yönetmelik)**

Article 4h – Similarity with Directive 2(1) ((biofuels +synthetic and paraffinic fuels not covered in Turkish version)

alternative fuels’ means fuels or power sources which serve, at least partly, as a substitute for fossil oil sources in the energy supply to transport and which have the potential to contribute to its decarbonisation and enhance the environmental performance of the transport sector. They include, inter alia

- 1) Electricity,
- 2) hydrogen,
- 3) Natural gas, including biomethane, CNG/LNG,
- 4) LPG,

- Draft Legislation: Principles and Procedures on Electrical Vehicle Charging Station





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Transport





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Improving fuel economy of cars put in the EU market

- Regulations 443/2009/EC and 510/2011 setting emission performance standards for new passenger cars and vans
- Goal: reduce CO₂ emissions from light duty vehicles
- Mandatory emission reduction targets are set on manufacturers (phase in approach: initial target at 2015 progressively tightened up to 2021, i.e.: 130 gr CO₂/km at 2015, 95 gr CO₂/km after 2020)
- Emission limits are set according to the vehicle mass using a **limit value curve** (targets for fleet average emissions shall be achieved: heavier cars are allowed higher emissions than lighter → flexibility for manufacturers to produce vehicles above the curve if these are balanced by vehicles below the curve)



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- Member States shall monitor and report national fleet average emissions to EU Commission
- If average emissions are exceeded financial penalties are imposed to manufacturers (*excess emissions premium*) for each vehicle registered
- Eco-innovation encouraged through emission credits equivalent to emission savings if manufacturers equip their fleet with innovative technologies verified by independent certified bodies
- *Super credits* for manufacturers: if they produce low emitting cars (below 50gr CO₂/km) each low emitting vehicle will be counted as more than one



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Consumer information: raising awareness

- Car labelling Directive 1999/94/EC requirements:
- A label and a poster display showing fuel economy and CO₂ emissions attached to cars at point of sale
- A guide on fuel economy and CO₂ emissions available free of charge
- Promotional literature on fuel economy and CO₂ emissions data provided



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Promotion of clean, energy efficient road transport in public procurement



- Directive 2009/33/EC
- Goal: promoting climate and energy policies goals in the transport sector
- Contracting authorities shall take into account energy consumption, GHG emissions and environmental impacts when purchasing road transport vehicles
- Energy and environmental award criteria introduced in the procurement procedure





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Turkey- Transport

Legislation in EU

Regulation (EC) No 443/2009 of the European Parliament and of the Council of 23 April 2009 setting emission performance standards for new passenger cars as part of the Community's integrated approach to reduce CO₂ emissions from light-duty vehicles

Equivalent legislation in Turkey

No regulation. Preparations are on-going.

Name of the legislation to be amended/enacted:

By-law on setting emission performance standards for new passenger cars to reduce CO₂ emissions from light-duty vehicles

Responsible Institution: Ministry of Science, Industry and Technology

Probable period of publication: First half of 2019



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Turkey- Transport

Legislation in EU

Regulation (EU) No 510/2011 of the European Parliament and of the Council of 11 May 2011 setting emission performance standards for new light commercial vehicles as part of the Union's integrated approach to reduce CO2 emissions from light-duty vehicles

Equivalent legislation in Turkey

No regulation. Preparations are on-going.

Name of the legislation to be amended/enacted:

By-law setting emission performance standards for new light commercial vehicles to reduce CO2 emissions from light-duty vehicles

Responsible Institution: Ministry of Science, Industry and Technology

Probable period of publication: First half of 2019



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Turkey- Transport

Legislation in EU

Directive 1999/94/EC relating to the availability of consumer information on fuel economy and CO2 emissions in respect of the marketing of new passenger cars (EC Vehicle Labeling Directive)

Equivalent legislation in Turkey

By-law Relating to Informing Consumers on Fuel Economy and CO2 Emissions of New Passenger Cars
(Official Gazette: 28 December 2003 No. 25330)
Entered into force on 1 January 2008.

According to Article 10: Ministry of Industry and Trade is responsible for the distribution of information and a guide on fuel economy and CO2 emissions and will perform this task through its provincial directorates. Articles 6 and 7 define the requirements for CO2 and fuel economy labels of passenger cars.

- manufacturers of the passenger cars are responsible for the preparation of this label.
- -the information required in the label is displayed in detail in the Annex I



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Turkey- Transport

Legislation in EU

Directive 2009/33 on the promotion of clean and energy-efficient road transport vehicles

Equivalent legislation in Turkey

No Regulation

INDC

«...on the promotion of clean and energy-efficient road transport vehicles»

National Climate Change Action Plan

Legislation Need mentioned «Integrating into national legislation the EU Directive 2009/33/EC on the “promotion of clean and energy-efficient road transport vehicles” which stipulates sanctions to ensure preference of vehicles with the lowest emission and highest energy efficiency in the purchase of public transport vehicles» Proposed Time Period: 2012-2014



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Waste





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EU Waste

- Framework regulated by Directive 2008/98/EC:
- Waste hierarchy:
 1. Prevention
 2. Preparing for re-use
 3. Recycling
 4. Other recovery (i.e.: energy recovery)
 5. Disposal
- Principles of self sufficiency and proximity in waste management
- Clear cut rules for permitting and operation of waste management plants



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EU Landfill of waste

- Directive 1999/31/EC
- Goal: regulate landfill of waste through its entire life cycle to reduce negative impacts on environment (reduction of methane, control of landfill gas emissions, contribution to fight against global warming)
- Classification of landfills according to 3 classes:
 1. Hazardous waste
 2. Non-hazardous waste
 3. Inert waste
- Rules on permitting and waste acceptance procedures
- Duties on operators ensuring adequate monitoring procedures in the operational as well as closure and *after-care* stages



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Waste

Legislation in EU

Directive 2008/98/EC on waste

Directive 1999/31/EC on the landfill
of waste

Equivalent legislation in Turkey

Regulation on waste management ((02.04.2015, Official
Gazette: 29314)

- The Regulation has abrogated previously valid three
regulations (namely on (i) management of
solid wastes, (ii) management of hazardous wastes and (iii)
general principles of waste management) on the field of waste
management and unified them in a single legal framework.

Regulation on the Storage of Wastes (26.3.2010, Official
Gazette: 27533)

(Atıkların düzenli depolanmasına ilişkin yönetmelik)
New Draft Legislation published but not adopted yet.



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Conclusion and Outlook

- An integrated approach is needed to analyse LCD regulatory framework
- Common goal (mitigation of GHG emissions) for different yet linked sectors
- Trends (consumer information, efficient use of resources, setting of minimum requirements, market surveillance)
- Terms of comparison in place (EU-Turkish legal systems) so now critical gap analysis of findings
- Room for improvement?
- ...efficiency in suggested recommendations



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4th Working Group Workshop February 2018, Bilkent Hotel, Ankara

Legal analysis of Low Carbon Development: EU and Turkish relevant legislation

Alessandra Barreca-EU Legal Expert

Ozlem

05 March 2018-Ankara

