



horizon  
futures

# TURKEY 2024

Packaging Legislative Analysis

## Contents

1. Overarching Packaging Requirements .....	2
1.1. Environmental Act No 2872, the Waste Management Ordinance and the Ordinance on the Management of Packaging Waste .....	2
1.2. Control of Packaging Waste Regulation June 2021.....	2
1.2. Regulation on Recycling Contribution Fee (RCF) .....	3
2. Extended Producer Responsibility (EPR) .....	4
2.1 EPR Scheme Description .....	4
2.2. Waste Management Regulation, April 2015.....	5
3. Recycling Definition and Targets.....	5
4. Reuse Definition and Targets.....	6
5. Packaging Material and Volume Minimisation .....	6
6. Plastics Regulation.....	6
6.1. (Plastik PoSetlerin Ucretlendirilmesine Llisin Usul ve Esaslar).....	6
6.2. Single Use Plastics .....	6
6.3. Plastic Bag Restrictions .....	6
7. Other Regulations .....	7
7.1. Circular 2021/15 – Green Deal Action Plan .....	7
8. Deposit Return Schemes (DRS) .....	7
8.1. Procedures and Principles Regarding Deposit System Applications for Reusable Packaging, Circular June 2020.....	7
9. End of Life Labelling (EOL) .....	8
Appendix.....	9
Introducing aura.....	10
Our Management Team .....	12

## TURKEY

### 1. Overarching Packaging Requirements

#### 1.1. Environmental Act No 2872, the Waste Management Ordinance and the Ordinance on the Management of Packaging Waste

This Waste Management Ordinance and the Ordinance on the Management of Packaging Waste provides the general legal framework for the regulation of packaging and plastic waste.

Included within the purposes of this Regulation, there is determination of criteria, conditions and specifications that relate to the production of packaging and the prevention of packaging waste through reuse, recycling and recovery methods. The aim is to both protect and improve the environment in a sustainable way through managing packaging and packaging waste in a deposit management system (DRS) as well as a zero-waste management system using the principles of a circular economy and resource efficiency.

Other general principles of this Regulation include extended producer responsibility (EPR) using the polluter pays principle, shared responsibilities obligating other stakeholders within the process, identification of biodegradable packaging and associated waste management as restrictions on plastic bag usage.

The Regulation encompasses all packaging placed on the market and the waste occurring from this packaging. Defective products, waste, packaging and production wastes not released onto the Turkish market are out of scope. The implementation of the provisions of Law NO. 7223 relating to placing on the market, conformity assessment, market surveillance and inspection and the notifications to be made relating to the packaging and packed products are not in scope of this Regulation.

#### 1.2. Control of Packaging Waste Regulation June 2021

The Turkish Ministry of Environment and Urbanization published a Regulation on the control of packaging waste on 26<sup>th</sup> June 2021. This regulation superseded the previous Control of Packaging Waste Regulation 2017.

**Article 1 of the Regulation states that the purpose of this Regulation is to determine the criteria, conditions and specifications relating to the production of packaging and the prevention of packaging waste via the following methods:**

- Reuse
- Recycling methods
- Recovery methods

**The aim is protection and improvement of the environment with a sustainable approach by managing packaging and packaging waste within the deposit management system and zero waste management system, using the principles of resource efficiency and circular economy.**

**The Regulation also aims to determine strategies and policies regarding the activities conducted by the Environment Agency of Turkey in relation to the management of packaging and packaging waste.**

**This Regulation covers all packaging placed on the Turkish market. Defective products and product waste as well as packaging and production waste that is not released onto the market are not in scope under this regulation.**

**The Regulation is also based on the following laws:**

- **Law No. 2872 on Environmental Law**
- **Law No. 7621 on Establishment of the Environment Agency of Turkey and Amendment of Certain Laws**
- **Law No. 7223 on Product Safety and Technical Regulations**

**There are obligations applicable to packaging manufacturers (actors that produce and/or import packaging) and packaging suppliers who are not packaging manufacturers but supply to actors placing it on the market.**

**Packaging Manufacturers obligations:**

- **Fulfil the obligations of EPR, conduct training activities with regard to the management of packaging waste.**
- **At design inception, produce packaging that aims to reduce waste after production and use and also facilitate recycling and recovery.**
- **Register with the packaging information system. In relation to packaging in the scope of the DRS and provide requested information and documentation to the Ministry and/or Agency.**
- **Comply with the regulations of the Ministry in relation to the use of recycled materials in packaging production.**

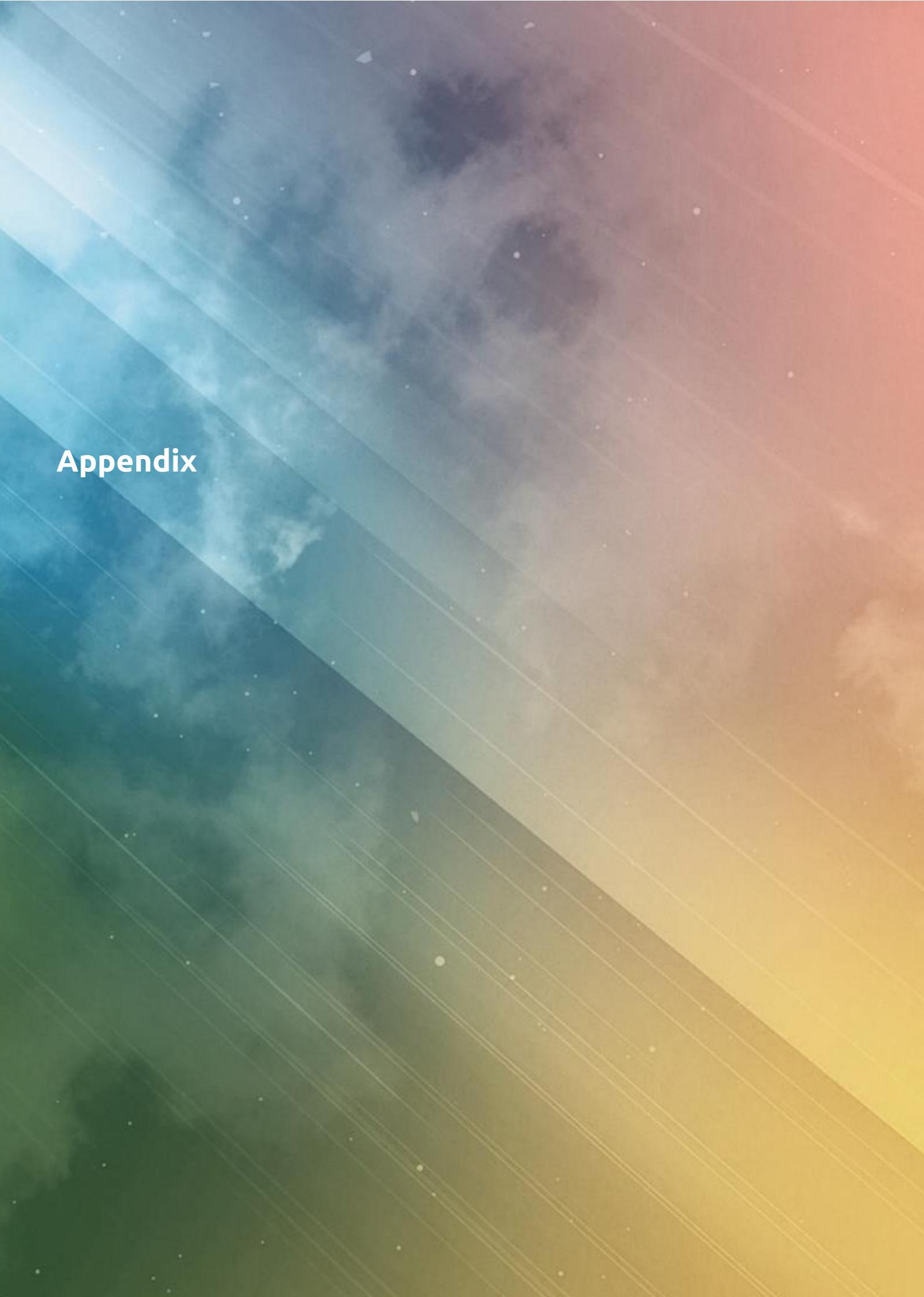
**Packaging Supplier obligations:**

- **Consider the reuse, recycling, recovery and environmental impact in the design and production of packaging, excluding non-alternative packaging. The production and sale of packaging that cannot be recycled and recovered is prohibited.**
- **Minimise the volume and weight of packaging.**
- **Ensure the packaging is suitable for reuse and/or recycling and recovery.**

- **Minimise harmful and hazardous substances during the production of packaging and packaging components. Account must be taken of the environmental impact of the substances contained in packaging during the recover or disposal of waste.**
- **The nature of the packaging must allow reuse of the packaging and its recycling.**

### **1.3. Regulation on Recycling Contribution Fee (RCF)**

# Appendix



## Introducing aura

### About Us

At the heart of our business is a sheer fascination with packaging and the impact it has on our world. Packaging's relationship with the environment is complex and we work with true ethical partners to educate, unite like-minded thinkers and share knowledge.

A global business, the reference point for packaging sustainability, utilising knowledge and data to provide the justification required to drive positive change.

### Services

Our expertise falls into three categories designed to deliver a strategic programme focused on the sustainability goals of our clients. These services are supported by a multi-disciplinary team made up of packaging, sustainability, technology and retail experts committed to making a measurable difference every day.

#### Consulting – Pioneering Packaging Strategy

We are packaging sustainability pioneers committed to true partnerships, focused on the delivery of mutual goals.

Our breadth of packaging sustainability knowledge across substrates, design, technical packaging, legislation, and recyclability allows us to evolve strategies to make a measurable difference both now and in the future.

Our Consultants build road maps for global change, our Technical Engineers develop specifications to refine the impact of your packaging and our Supplier Success Managers are on hand to assist with client education, communications and engagement.

As a result, we will deliver a robust strategy compliant with your sustainability goals aligned to current and future legislation.



### Technology – Managing Sustainability Everyday



We provide live data and control to deliver the accurate information you require to make real time decisions that impact your business and our planet.

**e-halo** is an unrivalled packaging sustainability platform combining state-of-the-art technology with consulting services, designed to manage the changing landscape of global packaging legislation, compliance, and sustainability commitments.

**e-halo** provides packaging component data at a granular level, making sustainable packaging part of everyday decision making.

**e-halo** manages compliance to evolving legislation and recyclability requirements with a comprehensive reporting suite allowing for real-time measurement against your business and sustainability targets.

### Insights – Data Driven Decisions



We utilise knowledge and data to provide the justification required to drive positive change.

**Data Management** – We interact with digital information every day. We gather, check, manage and translate data into valuable insights that our clients can use to measure and motivate positive change.

**Horizon Futures** – We offer horizon scanning services for global packaging legislation across 54 countries and for this we are unique. We interpret legislation rather than just quoting a legal directive, to help you understand the current and future packaging landscape. We then consider how emerging trends might potentially affect current policy and practice, enabling our clients to take a longer-term strategic approach to packaging sustainability.

## Our Management Team

- We are packaging sustainability pioneers committed to true partnership, which means to us a relationship focused on the delivery of the mutual goals of our business and that of our clients.
- Visionary
- Pioneering strategies which educate, unite and influence change
- Responsible
- Real-time data drives the changes needed to positively impact our planet
- Honest
- Decisions are informed, and our communications are authentic
- Collaborative
- Ethical Partnerships unify our mutual goals to create a vision fit for the future



**Greg Lawson**  
Managing Director



**Gillian Garside-Wight**  
Consulting Director



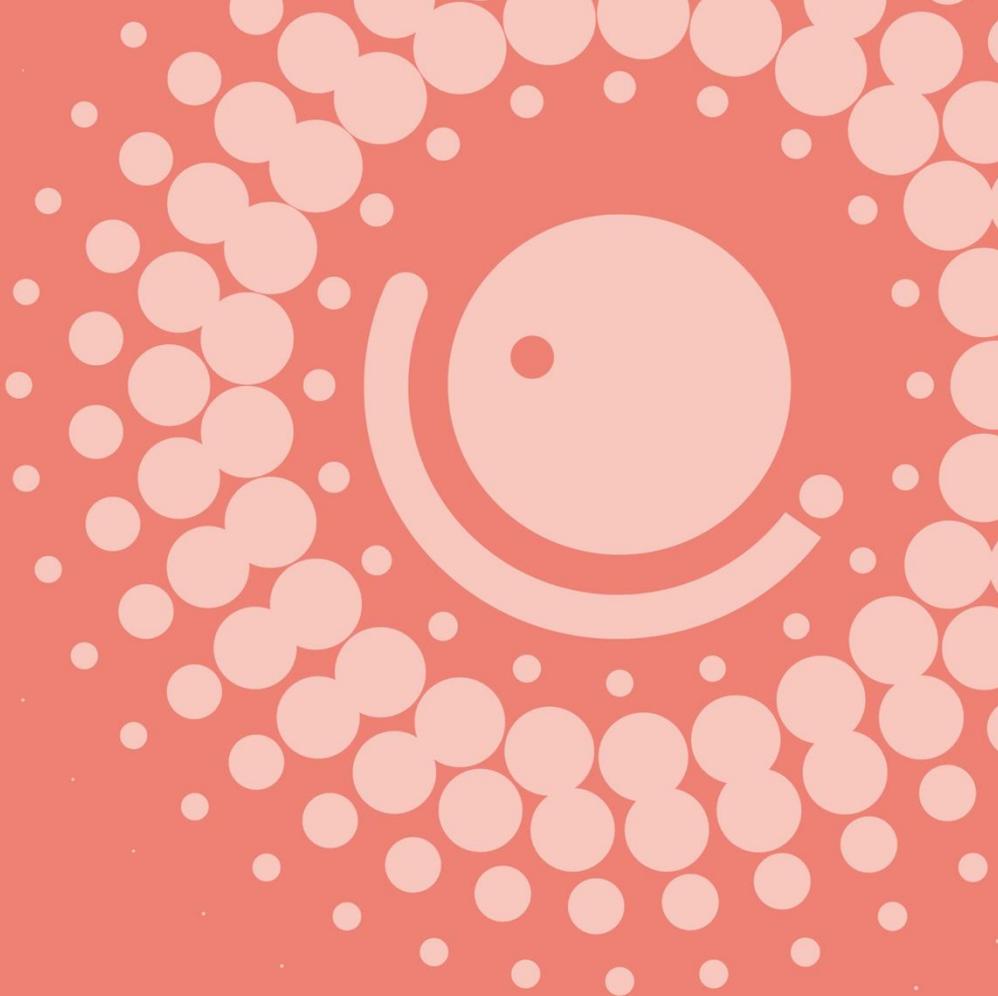
**Harriet Young**  
Marketing Director



**Sarah Kroon**  
Operations Director



**Trevor Yong**  
Business Development Director



Thank you from Team Aura