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EU WASTE FRAMEWORK DIRECTIVE: THE 2024 AMENDMENT & THE CURRENT POSITION OF TÜRKIYE ON WASTE MANAGEMENT PROCESSES

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The environmental agenda holds a significant place in the European Union's (EU) decision-making as the effects of the climate crisis accelerate more and more and are experienced all over the continent, leading to increased agricultural risks, fragile biodiversity, famine, irregular migration, extreme temperatures, wildfires and many more issues surrounding the climate change. As climate change and green policies are at the very centre of the EU today, the EU has been addressing the environmental issue since 1987, when a new "Environment Title" was introduced through the Single European Act, which provided the legal basis for the environmental policy of the EU.¹ One might argue that not only was the EU early to regulate environmental issues, it has been agile in addressing challenges regarding the environment such as management of the waste because the waste increases in direct proportion to the rise in the population. The Waste Framework Directive of 2008 is one of the endeavours to regulate the waste management processes.

The Need for Regulating Food and Other Waste: The Waste Framework Directive

The Green Deal along with the Circular Economy Action Plan aim to further focus on the maintenance of the resource-intensive sectors such as textiles and food, which put burden on waste management operations as they require additional measures regarding their disposal. Their disposal, on the other hand, includes the preparation process for re-use and recycling to ensure environmental sustainability.² Furthermore, both sectors mainly depend on agricultural activities that are closely associated with climate change because of observed consequences. In addition to being resource-intensive, textile and food industries are intensely affected by the outcomes of climate change, thus need to be regulated to minimise the existing impacts. According to the Food and Agriculture Organization of the United Nations, total global agriculture and agricultural land use emissions totalled up to 9.2. billion tonnes of carbon dioxide equivalent in 2018. Europe's

¹ Alyssia Petit and Christian Kurrer, "Fact Sheets on The European Union, "Environment policy: general principles and basic framework" 04/2024, https://www.europarl.europa.eu/erpl-app-public/factsheets/pdf/en/FTU_2.5.1.pdf Date accessed: 31.07.2024

² European Commission, Proposal for A Directive Of The European Parliament And Of The Council amending Directive 2008/98/EC on waste, 5.7.2023 COM(2023) 420 final 2023/0234 (COD) https://environment.ec.europa.eu/document/download/ca53d82e-a4d3-40b9-a713-93585058f47f_en?filename=Proposal%20for%20a%20DIRECTIVE%20OF%20THE%20EUROPEAN%20PARLIAMENT%20AND%20OF%20THE%20COUNCIL%20amending%20Directive%20200898EC%20on%20waste%20COM_2023_420.pdf Date accessed: 31.07.2024



contribution corresponded to one-tenth of total global emissions.³ Because waste management regarding the two resource-intensive sectors is critical in retaining sustainability, it might be understood that waste management bears vital importance, hence the legal framework EU Waste Framework Directive. In 2008, the relevant Directive was enacted to regulate waste management operations mainly in two sectors: textiles and food. The directive has been amended four times, the last being in 2024. In this article, the rules laid out in the directive and additional rules and requirements included in the 2024 amendment are presented along with the current legal framework in Türkiye regarding waste management.

As seen in other directives such as Landfill Directive, Water Framework Directive and Environmental Liability Directive; Waste Framework Directive sets out a “polluter-pays” principle⁴ where the polluter is held accountable and is obliged to pay for the disposal and recycling costs of the produced waste, which might still have an economic value or could be utilised otherwise. Other than being bound to be classified solely as waste, some kinds of outputs arising from the operations of entities are reported to be classified as “by-products” or granted “end-of-waste status”. While by-products could roughly be listed as substances which is known to be utilised in another way, end-of-waste status is only assigned to substances that could be utilised for specific aims and where a demand exists for them. The directive applies to entities in Member States; individuals or corporations which “develop, manufacture, process, treat, sell or import product (producer of the product)” and it is conveyed that producers have “extended responsibilities” when treating the waste emanating from their operations.

“Extended Producer Responsibility” has been a part of the Directive ever since its introduction, and it means that any entity that “professionally develops, manufactures, processes, treats, sells or imports products” is subjected to extended producer responsibility. Extended producer responsibility entails undertaking any financial or organisational responsibility for the waste management to take place in the full cycle of a product by the producer or polluter. It anticipates that the producers or the importers from other countries than the Member States be directly affected by the Directive which include importers from Türkiye.

The Directive anticipates the establishment of:

³ Giulia Conchedda and Francesco Nicola Tubiello, “Emissions due to agriculture. Global, regional and country trends 2000–2018.” FAOSTAT Analytical Brief Series No 18. Rome <https://openknowledge.fao.org/server/api/core/bitstreams/cc09fbbc-eb1d-436b-a88a-bed42a1f12f3/content> Date accessed: 31.07.2024

⁴ The Academy of European Law (ERA), “Specific Principles Polluter Pays Principle” https://www.era-comm.eu/Introduction_EU_Environmental_Law/EN/module_2/module_2_11.html Date accessed: 31.07.2024



- Measures and rules to make sure high-quality recycling operations,
- separate collection of paper, metal, plastic and glass, and the waste to not be mixed
- safe disposal operations that do not bring harm to human health and the environment,
- methodology and network of disposal and recovery installations,
- competent authorities responsible for supervising the compliance of the Directive or designate such competent authority

And it is needed:

- Hazardous waste to be packaged and labelled according to the international and Community standards,
- To be decided by the Member States if the costs of the waste management processes are borne partly or wholly by the producers/polluters, or if the distributors of such product may share these costs,
- The bio-waste is to be separately collected and treated while protecting the environment and using environment-friendly materials produced from bio-waste,
- The entities intending to treat waste to receive permission from the competent authority to carry out such process.

The directive mandates the concept of “waste hierarchy” which presents the order of priority to apply when treating the waste which goes:

- a) “Prevention,
- b) preparing for re-use,
- c) recycling,
- d) other recovery, e.g. energy recovery; and
- e) disposal.”

The steps in the hierarchy should be encouraged to be prioritised as it is lined up, and disposal should be considered as the last resort and the disposal should be carried out in an environmentally friendly manner and should not pose risks against human health.

The competent authority is required to maintain a register for keeping a record of the entities involved in the process of waste management. The entities involved in the process are identified to be businesses collecting or transporting waste, dealers or brokers, and businesses disposing of their non-hazardous waste at the place of production or whose operations are comprised of waste recovery. In addition to keeping a register, the competent authorities:

- put forward waste management plans which present an analysis of the existing waste management situation in the relevant state and



- identify steps to enhance processes such as re-use, recycling, recovery and disposal along with insights regarding the compatibility of the plan with the targets of the directive.

The waste collecting and transporting businesses, broker-dealers, and entities producing hazardous waste subjected to regular inspections which regard details on the origin, nature, quantity and destination of the waste to reveal their compliance with the provisions of the directive. The entities which are monitored are required to document information on their activities including the quantity, nature and origin of the waste, the departure and arrival point, how often the waste is collected, the transportation mode and the anticipated treatment method. These entities are also required to share any information asked by the competent authority. For possible increased accountability, the entities producing hazardous waste are supposed to keep the documentation history for at least three years while entities transporting hazardous waste are required to keep the records for at least twelve months.

Furthermore, states need to establish waste prevention programmes to overcome the increasing waste related to economic growth. At least every six years, the states need to revise the waste management plans and waste prevention programmes so that efficiency can be ensured. On top of inviting The European Environment Agency to cover the implementation and progress of waste prevention programmes in its annual report; relevant stakeholders and authorities and the public are motivated to get involved in the discussion sessions regarding the waste management plans and waste prevention programmes and anyone getting involved in the discussion sessions can reach these plans as a part of the public participation system. The states, on the other hand, inform the Commission in the case of any revisions of those plans and programmes.

Each state identifies punishments for those who breach the provisions of the transposed directive in the national regulation. The states convey information on the implementation of the relevant rules in electronic form to the Commission.⁵

2024 Amendments on the Waste Framework Directive: What Did Change?

A proposal to amend the 2008 Waste Framework Directive was submitted in 2023 for it to be enacted in February 2024 by 72 votes to none, with three abstentions. The 2024 amendment anticipates new targets and thresholds for reducing waste and handling waste-related operations while focusing on reducing food waste and ensuring the separation of textiles from other sources is done thoroughly.

⁵ Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives, Official Journal of the European Union, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32008L0098> Date accessed: 31.07.2024



To prepare for re-use and recycling, the municipalities are expected to increase the preparation for re-use and the recycling of municipal waste in:

- 2025 to a minimum of 55 % by weight,
- 2030, to a minimum of 60 % by weight,
- 2035, to a minimum of 65 % by weight.

When said targets are not reached, the state might postpone the deadlines up to five years if they meet certain conditions namely are being prepared for re-use and recycled less than 20 % or landfilled more than 60 % of its municipal waste generated in 2013 and if it informs the Commission of the intention of postponing a deadline 24 months prior as well as submitting an implementation plan containing assessments on the prior and current practices, measures, a timetable for reaching certain targets, and various information. If the targets are then postponed, the state should adopt new targets:

- a minimum of 50 % by 2025,
 - a minimum of 55 % by 2030,
 - a minimum of 60 % by 2035
- on reaching targets of increasing the preparation for re-use and the recycling of municipal waste.

Moreover, the amendment contains a description of the designed methodologies for municipalities to calculate the relevant targets. Accordingly, with the provisions, it is ordered for Member States to calculate the total weight of waste and waste prepared for re-use or recycled waste each year in a way that is intended to be standardized. Also, as of January 1, 2027, the municipal bio-waste exposed to aerobic or anaerobic⁶ treatment could be counted as recycled waste if the waste has been collected and sourced as prescribed.

The targets referred to above are closely monitored by the Commission along with the European Environment Agency as reports are prepared collectively regarding the progress on each deadline identified by the Member States at the latest three years before each deadline. Besides presenting the progress made by each Member State, these reports contain details on Member States which possess the risk of not being able to keep up with the promised targets and recommendations to remediate existing defects and examples of best practices where the most optimal outcomes are obtained.

The Member States are required to manage the process of safe waste disposal even if they are not able to maintain the process of recovery. Along with that, by 31 December 2024, the Commission will present reports about the evaluations regarding the disposal options

⁶ The concepts refer to the processes of microbial decomposition, where oxygen is required in aerobic cases, whereas it is not in anaerobic systems.



identified within the directive to the European Parliament and the Council, to present its opinions on the efficiency and conformity with the purposes laid out in the directive. Additionally, the Commission may deliver its insights for the need of possible limitations, setting forth various targets for environmentally safe waste management options.

The 2024 Amendment puts forward a new concept which is “sharing of best practices” that refers to the Commission’s organisation of meetings where information exchange is done, and best practices adopted by various Member States are shared among the participants and the results are made publicly available by the Commission.⁷

It might be argued that the amendment attempts to further increase efficiency by setting new targets and deadlines in environmentally friendly waste management processes which make up a significant portion of the sustainability.

Waste Management in Türkiye: Current Practices and Legal Frameworks

The action plans on national waste management are revealed regularly and the last one of these is National Waste Management and Action Plan (Ulusal Atık Yönetimi ve Eylem Planı (2016-2023)) that aims to harmonize the rules and requirements with the EU acquis; and it presents an assessment on the current practices, the weaknesses in the waste management systems, resolutions regarding the interaction between the population and the waste, and the targets to be achieved in the timeline until 2023.

The regulations on environmental issues in Türkiye are designed to align with the EU acquis as stated in the National Waste Management and Action Plan covering 2016-2023. In this regard, waste management systems and processes are developed to be integral to the EU legal framework.⁸ Through the Law of Environment, No:2872 (Çevre Kanunu) it is aimed to manage and enforce existing legal framework to be standardized into international provisions. The whole of the legal framework in Türkiye, mainly the Law of Environment, enforces the waste to be managed accordingly with “waste hierarchy” as is also mandated by the Waste Management Directive by the EU.

The legal framework on waste management in Türkiye has been accelerated after the beginning of the accession talks with the EU, which marks the year 2005 onwards.

Below are the regulations on waste management in Türkiye:

- Law of Environment (Çevre Kanunu, No.2876, 1983)

⁷ Consolidated text: Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives Document, 02008L0098-20240218 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008L0098-20240218> Date accessed: 31.07.2024

⁸ Ulusal Atık Yönetimi ve Eylem Planı 2023, Türkiye Cumhuriyeti Çevre ve Şehircilik Bakanı, https://webdosya.csb.gov.tr/db/cygm/haberler/ulusal_at-k_yonet-m--eylem_plan--20180328154824.pdf Accessed date: 31.07.2024



- Metropolitan Municipality Law (Büyükşehir Belediyesi Kanunu, No. 5216, 2004)
- Municipal Law (Belediye Kanunu, No. 5396, 2005)
- Waste Management Regulation (Atık Yönetimi Yönetmeliği, 2015)
- Mineral Waste Regulation (Maden Atıkları Yönetmeliği, 2015)
- Communiqué on Waste Collection Center (Atık Getirme Merkezi Tebliği, 2014)
- Regulation on Management of Electrical Goods Waste (Atık Elektrikli ve Elektronik Eşyaların Kontrolü Yönetmeliği, 2012)
- Regulation on Management of Packaging Waste (Ambalaj Atıklarının Kontrolü Yönetmeliği, 2005-2007-2011)
- Regulation on Regular Waste Storage (Atıkların Düzenli Depolanmasına Dair Yönetmelik, 2010)
- Regulation on Incineration of Waste (Atıkların Yakılmasına İlişkin Yönetmelik, 2010)
- Regulation on Management of End-of-Life Vehicles (Ömrünü Tamamlamış Araçların Kontrolü Hakkında Yönetmelik, 2009)
- Regulation on Waste Oil Management (Atık Yağların Kontrolü Yönetmeliği, 2008)
- Regulation on Management of Polychlorinated Biphenyls and Polychlorinated Terphenyls (Poliklorlu Bifenil ve Poliklorlu Terfenillerin Kontrolü Hakkındaki Yönetmelik, 2007)
- Regulation on Management of End-of-Life Tires (Ömrünü Tamamlamış Lastiklerin Kontrolü Yönetmeliği, 2006)
- Regulation on Management of Medical Waste (Tıbbi Atıkların Kontrolü Yönetmeliği, 2017)
- Regulation on Management of Excavation Soil, Construction and Demolition Waste (Hafriyat Toprağı, İnşaat ve Yıkıntı Atıklarının Kontrolü Yönetmeliği, 2004)
- Regulation on Management of Vegetable Waste Oils (Bitkisel Atık Yağların Kontrolü Yönetmeliği, 2015)
- Regulation on Management of Waste Batteries and Accumulators (Atık Pil ve Akümülatörlerin Kontrolü Yönetmeliği, 2004)
- Communiqué on Waste Collection Center (Atık Getirme Merkezi Tebliği, 2014)
- Communiqué on Compost (Kompost Tebliği, 2015)
- Communiqué on Management of Fermented Product with Mechanical Separation, Biodrying, Biomethanization Facilities (Mekanik Ayırma, Biyokurutma, Biyometanizasyon Tesisleri ile Fermente Ürün Yönetimi Tebliği 2015)
- Communiqué on Fuel Derived Waste Additional Fuel and Alternative Raw Material (Atıktan Türetilmiş Yakıt, Ek Yakıt ve Alternatif Hammadde Tebliği, 2014)
- Communiqué on Recycling of Certain Non-Hazardous Wastes (Bazı Tehlikesiz Atıkların Geri Kazanımı Tebliği, 2011)
- Communiqué on Waste Interim Storage Facilities (Atık Ara Depolama Tesisleri Tebliği, 2011)



- Communiqué on Waste Transportation on Highways (Atıkların Karayolunda Taşınmasına İlişkin Tebliği, 2015)
- Communiqué on Tanker Cleaning Facilities (Tanker Temizleme Tesisleri Tebliği, 2009)
- Communiqué on Technical Procedures for Storage, Purification, Dismantling and Processing of End-of-Life Vehicles (Ömrünü Tamamlamış Araçların Depolaması, Arındırılması, Sökümü ve İşlenmesine İlişkin Teknik Usuller Tebliği, 2011)

The principle of “polluter/producer pays” is also present in managing the waste in the Turkish legal framework. This principle could be used to reduce the burden on the institutions, which undertake most of the waste management operations. Primary institutions that undertake responsibilities to manage the waste are:

- Ministry of Environment, Urbanization and Climate Change (Çevre ve Şehircilik Bakanlığı): Identifying principles and policies to protect and improve the environment, developing strategies and standards to prevent environmental pollution, and a set of other activities on policymaking, monitoring and research
- Municipalities: Planning, managing and monitoring municipal waste; undertaking processes such as recycling, storage and disposal of the waste; finding and operating facilities to cover these responsibilities, undertaking operations of industrial, medical and sea waste
- Polluters or producers: Costs of disposing of the hazardous and private waste released by producers, which also goes by the polluter, are handled by them in the framework of the “polluter pays” principle
- Ministry of Development (Kalkınma Bakanlığı. Now T.C. Cumhurbaşkanlığı Strateji ve Bütçe Başkanlığı, Eng.: Presidency of the Republic of Türkiye Strategy and Budget Directorate): Preparing strategies, plans and programmes, managing the public budget by transferring resources into strategical priorities
- Ministry of Treasury and Finance of Türkiye (Türkiye Cumhuriyeti Hazine ve Maliye Bakanlığı): Handling taxation regarding the waste management processes.

Türkiye’s Alignment with EU’s Acquis on Environment

In line with the aim of aligning with the EU acquis, Türkiye has been making efforts to harmonize its legal system since the accession process started in 2005. Although the accession process began in 2005, eight chapters⁹ associated with the Customs Union have been closed due to a decision by the EU General Affairs Council on December 11, 2006. This decision followed Türkiye's objection to extending Customs Union responsibilities to the Greek Administration of Southern Cyprus (GASC), which includes opening harbours and airports to vessels from GASC. While the relevant decision has been revoked in 2009, GASC protested the revoking of the decision and vetoed it, requesting further sanctions for Türkiye. Upon other Member States not approving such request, the GASC announced that

⁹ The chapters referred are Chapter 1: Free Movement of Goods, Chapter 3: Right of Establishment and Freedom to Provide Services, Chapter 9: Financial Services, Chapter 11: Agriculture and Rural Development, Chapter 13: Fisheries, Chapter 14: Transport Policy, Chapter 29: Customs Union, Chapter 30: External Relations.



it would unilaterally veto six other chapters.¹⁰ As of 2024, Türkiye's accession process remains hindered due to the GASC's blockage.

Although the accession process of Türkiye is currently blocked, it sustains its motivation to keep aligning with the EU's legal system. In this regard, the screening meetings for the Environment Chapter was completed in 2006. After Türkiye fulfilled the criteria needed for opening of the chapter, the EU Commission issued the screening report to indicate the chapter is ready to be opened in 2009. The EU then adopted a common position to determine one political and five technical criteria to close the chapter which suggest the completion of the process for the related chapter. These six criteria identified in the document could be outlined as such:

1. Türkiye fulfils the obligations arising from Additional Protocol,
2. Türkiye adopts EU acquis and gets involved in the horizontal integration,
3. Türkiye adopts relative acquis regarding the water quality,
4. Türkiye adopts acquis on industrial pollution control and risk management,
5. Türkiye sustains integration process in other sectors too including adopting requirements on nature protection and waste management processes,
6. Türkiye develops capacity of administrative units to handle supervisory mechanisms, and Türkiye displays its readiness in constructing needed units to enforce and apply the acquis.

The Sub-Committee No.8 which is titled Transportation, Environment and Energy was among eight sub-committee without power of decision-making that were founded through Decision No. 3/2000 to monitor the progress in the Environment chapter. The last one of the meetings of the sub-committee was held online on 14-16 November 2023. Since the opening of the chapter in 2009, various projects have been implemented with the aim of reaching the commitments identified in the common position by the EU. While the Environment Chapter has often been led by two ministries which are Ministry of Environment, Urbanisation and Climate Change and Ministry of Agriculture and Forestry, some of the projects are still ongoing. These projects include various initiatives concerning the management of waste, such as chemical waste, mining waste, and water waste, as well as aims to reduce carbon emissions and pollution in different fields. For the programming year 2019-2020, there are five ongoing projects that aim to align environmental standards with those of the EU.¹¹

According to the most recent country report by Commission on Türkiye covering 2023 period, Türkiye has only harmonised its environment regulations with those of the EU to some extent. While the report suggests increased compliance with waste management regulations, it states that waste management plans are largely practiced locally, with weak regional implementation. On the other hand, the report acknowledges that the 2023 earthquakes negatively impacted the affected municipalities since infrastructure was

¹⁰ These chapters are Chapter 2: Free Movement of Workers, Chapter 15: Energy, Chapter 23: Judiciary and Fundamental Rights, Chapter 24: Justice, Freedom and Security, Chapter 26: Education and Culture, Chapter 31: Foreign, Security and Defence Policy.

¹¹ Republic of Türkiye Ministry of Foreign Affairs Directorate for the EU Affairs, "Fasıl 27: Çevre ve İklim Değişikliği", 23 August 2024, <https://www.ab.gov.tr/fasil-27-cevre-92.html> Accessed date: 5.09.2024



seriously damaged. The release of asbestos is pointed out to be problematic as management of construction debris continues to pose a threat to environmental pollution. Additionally, the ship recycling acquis is stated to not be aligned with the EU requirements. However, it is noted that the textile sector has recently adopted a sustainability strategy and action plan, which further aligns Turkish standards with those of the EU. On recycling the total waste, the recycling capacity of Türkiye is indicated to have increased to 27%. Relevantly, the harmonisation efforts are stated to continue in Deposit Management System and in medical sector.¹²

Conclusion: Waste Management Practices Share Common Standpoints

The EU Waste Framework Directive regulates waste management processes in Member States; from prevention, preparing for re-use, recycling, other recovery, and energy recovery to disposal which make up the “waste hierarchy” where most environment-friendly option possible is encouraged to be applied when treating the waste. The Directive handles many types of waste, which need to be separately treated. However, food waste holds a significant place, as statistics indicate a critically high level of dissipation around the EU. This is particularly concerning given the remarkable impact of food production and agricultural activities on climate change.

The Directive might be suggested to emphasize two main principles, one of which is the “polluter pays” principle, following the previously disclosed waste hierarchy. The concept refers to the obligation to cover the costs of recycling and disposal of the waste released by the producer itself as the responsible polluter.

For monitoring purposes, the directive anticipates the designation of a competent authority so that the entities affected by the laid-out rules can be observed. The entities, however, must get involved in an online registration system.

As well as the public participation system, the 2024 amendment includes the method of “sharing the best practices” and it is done by the Member States whose representatives come together to talk about what they do that result in the best outcome environmental-wise. This is assumed to inspire other participants to work in a similar vein to achieve the best-known outcomes. Furthermore, the 2024 amendment sets out new targets for the entities subject to the directive which could be commented on to help contain the dynamism in the waste management sphere by further mobilising the entities. For monitoring purposes, the directive anticipates the designation of a competent authority so that the entities affected by the laid-out rules can be observed. The entities, however, must get involved in the registration as was required by former versions of the directive. Member States are also responsible for submitting reports on the implementation of the transposed directive.

On the other hand, Türkiye has an extensive legal framework to regulate waste management processes. Since 2005, the start of the accession talks with the EU, Türkiye

¹² European Commission, “Türkiye 2023 Report” 8 November 2023, SWD(2023) 696 final, https://neighbourhood-enlargement.ec.europa.eu/document/download/eb90aefd-897b-43e9-8373-bf59c239217f_en?filename=SWD_2023_696%20T%C3%BCrkiye%20report.pdf Accessed date: 5.09.2024



has amended several regulations to be aligned with the EU acquis and established several regulations in line with the EU's legal structure.

Türkiye's legal composition on waste management systems also inhibits an understanding of "waste hierarchy" to achieve the most environmentally appropriate outcomes. Moreover, "polluter pays principle" is also adopted as in the EU except for the fact that costs of only hazardous waste are demanded to be covered by the producers, while the EU does not discriminate whether the waste is hazardous or not.

Türkiye is a remarkable trade partner to the EU and EU is one of the most attractive target markets of Turkish exporters. Thus, the requirements identified by the directive directly concern the Turkish exporters or those who are considering starting export operations in the future. In conclusion, the legal spheres of Türkiye and the EU share many common characteristics in regulating the waste management processes. However further alignment is necessary due to the European Green Deal and mainstreaming of environmental policies in the EU. Türkiye's developmentalist economic agenda need to be further adjusted to a green growth strategy which prioritizes environmental sustainability concerns.

