Session SB64 (2026)

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Facilitative, Multilateral Consideration of Progress

A compilation of questions to – and answers by – **Türkiye**
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Title: Challenges in estimating GHG emission reductions of the PaMs

Question From Party: Japan

Question raised on: 07.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: According to page 117 of the BTR1, each Ministry overseeing its respective policies and measures is responsible for monitoring and evaluating the implementation status and the GHG emission reduction impacts of those policies. However, the estimates of expected and achieved GHG emission reductions for the PaMs are reported as "NE" in CTF5. What were the challenges in reporting emission reductions, and what is your plan to improve the reporting?

Answer:

Türkiye appreciates this question and the opportunity to clarify the reporting of emission reduction impacts of policies and measures (PaMs).

While it is correct that each responsible Ministry monitors and evaluates the implementation status of its respective policies and measures, several challenges were encountered in quantifying and reporting the expected and achieved GHG emission reductions for inclusion in CTF Table 5, which led to the use of “NE” (Not Estimated) in the current BTR.

The estimation of emission reduction impacts at the individual policy level remains methodologically complex. Many of Türkiye’s policies are cross-sectoral and interact with each other, making it difficult to isolate the mitigation impact of a single policy without risking double counting. In particular, overlapping measures in energy, transport, industry, and efficiency policies complicate attribution of emission reductions.

In light of these challenges, Türkiye opted for a conservative and transparent approach by reporting “NE” where robust and comparable estimates could not yet be ensured.

Title: Key policies behind Türkiye’s rapid renewable energy deployment

Question From Party: Japan

Question raised on: 07.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: The pace of renewable energy deployment in Türkiye is truly impressive. Could you kindly elaborate on the most significant policy that has enabled such rapid progress? If there are any conditions or

preparations, such as those relating to transmission and distribution networks, local community acceptance and understanding, technological development and human resource development, that could be helpful for other countries, Japan would appreciate it if you could share them.

Answer:

Türkiye has significantly increased its renewable energy installed capacity over the last 20 years. The most important factor in this increase is the incentive regulations implemented for renewable energy sources in market activities.
Most importantly, the Renewable Energy Support Mechanism (YEKDEM), implemented since 2011, offers producers generating electricity from renewable energy sources attractive long-term power purchase prices. YEKDEM provides feed-in tariff prices through a contract for difference method. Furthermore, to promote domestic production in renewable energy technologies, domestic contribution price support, applied as a feed-in premium under YEKDEM, is also provided for these facilities. In addition, the Renewable Energy Resource Areas (YEKA) model has been implemented, bringing numerous large-scale power plants to the country and fostering domestic production. Furthermore, in last year, several legal amendments have been made to shorten the permit processes and accelerate investments for facilities based on renewable energy sources.

Title: Electricity storage

Question From Party: Australia

Question raised on: 08.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: Türkiye has an ambitious goal to increase electricity storage capacity from zero in 2022 to 5,000 MW by 2028 (BTR p116) and has amended the By-Law on Electricity Market Licence to achieve this. Is Türkiye intending to implement additional policies and measures to incentivise electricity storage capacity?

Answer:

Türkiye has set targets for integrating intermittent renewable energy sources such as wind and solar energy into the system, including battery storage technology. Within this framework, companies committing to installing battery storage systems were granted wind and solar energy production licenses without any tender or licensing fees. Furthermore, wind and solar power plants with integrated battery storage systems were included in the Renewable Energy Support Mechanism (YEKDEM) and subject to feed-in tariffs offered through the contract for difference method. Additionally, to promote domestic production of battery storage technologies, these facilities were included in the domestic contribution price support applied as a feed-in premium under YEKDEM, and the support period was extended from 5 to 10 years.

Title: Question to Türkiye on capacity building needs

Question From Party: United Kingdom of Great Britain and Northern Ireland

Question raised on: 08.04.2026 CEST

Question Category: Reporting related capacity-building needs

Question: Thank you Türkiye for the opportunity to comment on your first Biennial Transparency Report. In your report you mention the need for capacity building in cross-cutting areas such as just transition and

carbon pricing. Can you please share what actions are needed to enhance the effectiveness of your climate strategies?

Answer:

In the context of climate change adaptation and mitigation process ensuring a just transition requires a comprehensive, inclusive, and evidence-based policy framework that effectively addresses emerging socio-economic and labour market challenges. In this regard, key priority areas include:

- Assessing and addressing the social and economic impacts of the green transition on vulnerable groups;
- Integrating social protection systems with climate change impacts, as well as mitigation and adaptation policies;
- Identifying reskilling and upskilling needs in line with evolving labour market demands;
- Anticipating emerging skills, occupations, and education and training requirements driven by green and digital transformation;
- Conducting in-depth sectoral and regional analyses to capture differentiated transition dynamics and needs;
- Strengthening the capacities of small and medium-sized enterprises (SMEs), particularly in terms of skills development, access to finance, and technology adoption;
- Mobilising adequate and sustainable financing to support an inclusive, resilient, and competitive transition process.
- Knowledge and technology sharing, along with enhanced international collaboration, are essential for an effective and inclusive transition

Türkiye's Ongoing Efforts

Türkiye is advancing its just transition agenda through a coordinated, multi-stakeholder, and forward-looking policy approach:

- Türkiye has embedded the principle of Just Transition into its national policy framework. In addition, The Climate Law enacted in 2025 recognizes just transition as a guiding principle under the 2053 Net Zero and green growth vision, including provisions related to vulnerable groups, employment measures, new job creation, and just transition financing;

- Under the coordination of the Ministry of Labour and Social Security, the National Employment Strategy (2025–2028), which entered into force following its publication in the Official Gazette dated 1 February 2025, identifies "enhancing skills alignment in the context of green and digital transformation in labour markets" as a core policy pillar and assigns responsibilities to relevant institutions;
- Preparatory work for Türkiye's National Just Transition Strategy is ongoing. The Strategy is envisaged as the social policy pillar of Türkiye's climate change mitigation and adaptation framework and is planned to be announced at the 31st Conference of the Parties (COP31);
- Stakeholder engagement is being strengthened through structured sectoral and thematic consultations conducted in collaboration with civil society organisations and sectoral stakeholders;
- Institutional and technical capacity-building efforts are being implemented to support the effective design and implementation of just transition policies;
- Analytical and data-driven studies are underway to support evidence-based policymaking, including assessments of sectoral and regional impacts, labour market dynamics, and skills needs.

In the area of carbon pricing, enhancing the effectiveness of climate strategies would require further strengthening of institutional and technical infrastructure, human capacity, and public awareness. Priority actions may include building the capacity and infrastructure needed for the national ETS, the voluntary carbon market, national offsetting mechanisms, and the future implementation of Article 6 of the Paris Agreement. It would also be important to strengthen technical and institutional capacity for carbon market functioning, including MRV and registry systems, carbon market operations, compliance-related processes, market oversight, and the administrative arrangements needed for the effective operation of carbon pricing instruments across sectors. At the same time, targeted training for relevant industry stakeholders, particularly SMEs, commercial and industrial associations, exporter groups, development agencies, and organized industrial zones, would be important to support participation and implementation. In addition, support for

private companies in meeting carbon-related reporting requirements, including those arising from the EU CBAM, could further strengthen implementation capacity. More broadly, stronger institutional capabilities on climate finance, sustainability reporting, green taxonomy, circular economy practices, and climate-risk management in the financial sector would help improve the overall effectiveness of carbon pricing as a climate policy tool.

Title: Net-zero initiatives and emission trading system (ETS)

Question From Party: Canada

Question raised on: 08.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: In July 2025, Türkiye's parliament passed the country's first Climate Law. What government initiative(s) are moving Türkiye towards achieving its net-zero goals? To what extent is the national emissions trading system expected to contribute to NDC implementation and in the longer term contribute to net-zero?

Answer:

To achieve net zero goals, Türkiye has the Long-Term Climate Strategy. The Long-Term Climate Strategy not only provides strategies for climate change mitigation and adaptation sectors, but also encompasses sectoral strategies related to technology, just transition, climate finance, and capacity building. These sectoral strategies are critically important for enabling Türkiye to sustain its long-term national development process in a low-carbon and environmentally sustainable manner.

The mitigation section of the Strategy includes a total of 35 strategies across 7 sectors, while the adaptation section contains 38 strategies across 11 sectors. In addition, there are 16 further strategies covering technology, just transition, climate finance, and capacity building. Overall, the Long-Term Climate Strategy comprises a total of 89 strategies across 18 sectors and 4 cross-cutting areas.

Among the government initiatives moving Türkiye towards its net-zero goal, the national Emissions Trading System (ETS) stands out as one of the most concrete market-based instruments. The Climate Law adopted in July 2025 established the legal basis for the ETS, and this was followed by the preparation of draft secondary legislation setting out the detailed design and implementation procedures of the Türkiye ETS. The system is planned to start with a pilot phase covering emissions-intensive energy and industrial sectors, and it is expected to begin with a scope of around 250 million tonnes of CO2 equivalent. Following the pilot phase, this coverage is expected to increase to around 290 million tonnes of CO2 equivalent in the first implementation period. Considering that Türkiye's total greenhouse gas emissions were 584.5 million tonnes of CO2 equivalent in 2024, the initial coverage of the ETS will already be significant.

In this respect, the Türkiye ETS is expected to make an important contribution to NDC implementation by putting a price on carbon, improving the cost-effectiveness of mitigation, and creating a stronger framework for private sector investment in cleaner technologies, energy efficiency, and industrial transformation. Over the longer term, the Türkiye ETS is expected to support the country's net-zero transition by serving as a key policy instrument for emissions reduction in line with Türkiye's updated NDC pathway and its 2053 net-zero vision.

Title: Status of the Climate Law

Question From Party: New Zealand

Question raised on: 08.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: Türkiye reported in its first Biennial Transparency Report that the draft Climate Law is under development. New Zealand notes the Climate Law is intended to play a key role in supporting mitigation efforts, including through the establishment of a national emissions trading system. Could Türkiye provide an update on the current status of the Climate Law, and expected benefits of the new emissions trading scheme?

Answer:

Türkiye's Climate Law entered into force in July 2025. The Law established the legal basis for the national Emissions Trading System (ETS), and Articles 9 and 10 are specifically devoted to ETS-related provisions. These articles set out the main framework for the establishment and operation of the system, including the relevant institutions and authorities that will be responsible for its implementation. Following the adoption of the Law, draft secondary legislation for the implementation of the Türkiye ETS was prepared. The draft Regulation sets out the detailed rules and procedures for the design and operation of the system, including its scope, institutional responsibilities, and core implementation modalities. Although the Regulation has not yet been published, the related technical work and internal procedures have been completed, and the draft is intended to provide the operational framework for the formal launch of the Türkiye ETS.

The Türkiye ETS is expected to provide several important benefits. It will establish a mandatory carbon market in Türkiye and create a carbon price signal for emissions-intensive sectors. In this way, it will support greenhouse gas mitigation in a cost-effective manner and help guide investment towards cleaner technologies, energy efficiency, and industrial transformation. More broadly, the Türkiye ETS is expected to become one of the key market-based instruments supporting the implementation of Türkiye's NDC and, in the longer term, the country's net-zero emissions objective.

Title: Progress on implementation of GHG inventory review recommendations

Question From Party: European Union

Question raised on: 08.04.2026 CEST

Question Category: National inventory report

Question: Türkiye's Technical Expert Review Report (TERR) includes a number of recommendations for the national greenhouse gas (GHG) inventory across the Energy, IPPU, Agriculture, LULUCF and Waste sectors (Table 3–7 of the TERR). Could Türkiye inform on progress made in addressing these recommendations and in strengthening its institutional arrangements and capacities?

Answer:

Türkiye welcomes this opportunity to report on progress made in addressing the areas of improvement identified in the Technical Expert Review Report (FCCC/ETF/TERR.1/2024/TUR and its Addendum) and on steps taken to strengthen its institutional arrangements and technical capacities. The following account is organized by sector and reflects actions taken following the review conducted in March 2025 in Ankara.

Sector	Explanation
General (Institutional Arrangements&Capacity Building)	Türkiye's GHG inventory is coordinated by the Turkish Statistical Institute (TÜİK) in its capacity as the national inventory compiler, with sector-specific data provision from the relevant line ministries and agencies. The inventory

Sector	Explanation
	preparation process follows established institutional arrangements under the climate transparency framework. Türkiye has strengthened its inventory team with new personnel additions since the BTR1 review, one assigned to the waste sector and one to the energy sector, expanding the institutional capacity dedicated to GHG inventory compilation. In parallel, inventory staff participated in a CBIT-supported training programme structured in two complementary parts: the first addressed foundational conceptual training on GHG inventories for newly joined experts, while the second engaged experienced inventory compilers on sector-specific methodological challenges, improvement opportunities and solutions to outstanding issues identified in previous submissions. In addition a capacity building project aimed at enhancing institutional capacity for LULUCF sector estimations has been developed by Ministry of Agriculture and Forestry and is currently under the ratification process. On reporting coordination, Türkiye has noted that the submission timing mismatch between the NID/CRTs and the BTR — which led to inconsistencies in CTF tables 6 and 7 — will be resolved for BTR2, as the NID and CRTs are expected to be submitted by 15 April of the BTR submission year, ahead of the BTR deadline. Regarding further capacity development priorities, two high-priority capacity-building needs were identified jointly by Türkiye and the TERT: (1) quantifying and assessing the impacts of policies and measures on GHG emissions and removals (11_CBN.3), and (2) developing longer-term projections using the national GHG inventory as a basis (13_CBN.1). A Capacity-building Initiative for Transparency (CBIT) project approved under the Global Environment Facility is being implemented over 2025–2028 to address these and related needs. Türkiye remains committed to continuous improvement of its transparency reporting and to reflecting the progress described above in its BTR2 submission.
Energy 1.A.1.a	3.E.2 The technical evaluation process regarding the natural gas oxidation factor has not yet been finalized. To eliminate existing uncertainties and maximize inventory accuracy, technical consultations, data analyses, and research remain actively underway in coordination with relevant departments and stakeholder institutions. Based on the outcomes of these ongoing studies, it is intended that methodological explanations and any subsequent updates will be reflected in future National Inventory Documents (NID) and transparency reports. 3.E.4 In accordance with the Electricity Market Law No. 6446, autoproducers in our country are categorized as main electricity producers. Consequently, classifying greenhouse gas emissions resulting from the electricity and heat generated by autoproducers under the "Electricity and Heat Production" sector is consistent with national legislation. This methodological approach does not alter the total greenhouse gas emission volume. Detailed justifications for this methodological preference and how it reflects national circumstances are already included in the inventory, however, more comprehensive documentation in future national inventory reports may be considered to further enhance transparency.
Energy (excl. 1.A.1.a&transport)	3.E.1 Resolved 3.E.2 It is planned to revise the study on oxidation factors conducted by the Ministry of Energy and Natural Resources once it is completed.

Sector	Explanation
	3.E.3. Fuel and sector breakdowns can be provided to the extent permitted by the energy balance tables. Emissions reported under different categories are specified in the CRT tables. 3.E.7 Partially resolved. The error regarding N_2O has been corrected; however, no plans have yet been made to address CH_4 emissions at a higher tier. More detailed information on this matter will be added to the NID. 3.E.8 This situation resulted from adjustments made to certain fuels in the energy balance tables and is due to the fact that these changes were not applied retroactively. This matter is currently under consideration, and it is planned to apply the structural changes made to the energy balance tables retroactively using appropriate technical methods in next submission
Transport	3.E.5 Ministry of Transport and Infrastructure is working with relevant stakeholders to develop country-specific carbon contents for gasoline and LPG. 3.E.6 Ministry of Transport and Infrastructure is actively undertaking efforts to improve data availability and methodological capacity, with the aim of enabling the required level of disaggregation in future submissions.
IPPU	4.I.1 Turkish Statistical Institute has initiated studies to improve the estimation of CO_2 emissions from the lime sector by utilizing plant-specific data from the MRV system, following a detailed assessment of the MRV data provided by Ministry of Environment, Urbanization and Climate Change. These efforts aim to support the transition towards higher-tier methodologies in line with the 2006 IPCC Guidelines. 4.I.2 The methodology used to address data gaps in the ceramics sector is described in the 1990-2024 NID. 4.I.3 Description of the soda ash production processes used by all plants in the country has been included in the 1990-2024 NID. 4.I.4 Türkiye has initiated studies and is currently investigating data sources in order to estimate and report CO_2 emissions from the use of urea in vehicles equipped with selective catalytic reduction technology for pollution control in future submissions.
F-gases	4.I.5 DoCC would like to inform that the planned project has now been initiated, focusing on the development of an ODS bank and supporting the disaggregation of activity data (AD) for HFC emissions. Upon completion of the project, improvements will be assessed in the aggregation and allocation of emissions across relevant categories. In addition, data collection has commenced under the national regulatory framework through the online F-gas licensing and equipment registration system. It is expected that, once the system reaches a sufficient level of data coverage and maturity, it will significantly contribute to improving data disaggregation and the allocation of emissions in future submissions.
Agriculture	5.A.1 Our research is almost decisive in estimating CO_2 emissions amounted to far less than 100 kt due to liming applied on soils, which is far below 2%00. Thus, liming is considered insignificant as per paragraph 32 of the MPGs. Indirect emissions due to leaching and run-off from manure are calculated as 135 kt CO_2 eq. for the latest reporting year. This emission level is considered insignificant and reported as NE according to Decision 18/CMA.1, Annex, paragraph 32. 5.A.2 As mentioned in the previous NID, more accurate country-specific data will be obtained as a result of the agricultural census in 2026. 5.A.3 More accurate country-specific data will be obtained as a result of the agricultural census in 2026. After the results obtained, the Tier 2 method

Sector	Explanation
	may be applied for this category.
LULUCF	6.L.1 It has been determined that these variations resulted from corrections made to certain inconsistencies in the use matrix identified during the recalculation. 6.L.2 Research in this area is ongoing, given the long-term observational and measurement requirements involved.
Waste	7.W.1 In the 1990–2024 NID, Türkiye has clarified that waste composition statistics refer to waste collected by municipalities, not waste generated, as this data is compiled directly from municipal sources. This distinction is now explicitly documented in the NID, which resolves the TERT's concern regarding the basis of waste composition reporting. 7.W.2 The current approach is based on available data and aims to avoid double counting with MSW, with industrial waste streams already included in MSW excluded accordingly. Türkiye continues to assess the existence and scale of separately managed industrial waste disposal sites, including privately operated facilities. Where such facilities are identified, associated CH_4 emissions will be estimated using appropriate methane correction factor values, while avoiding double counting with MSW. 7.W.3 Türkiye acknowledges the limitation related to the lack of information on the depth of unmanaged SWDS and the implications for the application of appropriate MCF values. The current approach is based on available data. Türkiye continues to assess options to improve the underlying information, including through existing data collection processes. 7.W.4 In the 1990–2024 NID, Türkiye has clarified that emissions from waste disposed of in lakes and rivers have not been separately reported, as estimates based on available and approximated activity data and default IPCC emission factors (2019 Refinement, MCF=0.8) indicate that emissions are below the threshold for insignificance. 7.W.5 Türkiye clarifies that the difference between the reported amounts of waste treated by composting plants reflects differences in data definitions. The value reported in table 7.5 corresponds to the amount of waste delivered to composting plants as reported by municipalities, while the value reported in table 7.24 and CRT 5.B represents the amount of waste actually treated by composting and used in emission calculations. No adjustment to SWDS is required, as only the composted fraction is considered in the estimation of emissions. This explanation will be added transparently in the next NID. 7.W.6 As reflected in the planned improvement section of the 1990–2024 NID, emissions and the amount of CH_4 for energy recovery from anaerobic digestion at biogas facilities are planned to be included in future inventory submissions, subject to the availability of relevant data and the existence of such treatment processes. Türkiye continues to monitor available waste statistics and other relevant information to assess the presence of biogas facilities with anaerobic digestion. Where such information becomes available, these emissions will be considered for estimation. 7.W.7 A transparent description of the methodology used to derive the fraction and amount of MSW disposed of through open burning, including the biennial survey basis, the fraction calculation approach, and the interpolation method applied for non-survey years, has been added to the 1990–2024 NID. 7.W.8 As reflected in the planned improvement section of the 1990–2024 NID, Türkiye plans to improve the parameters used in the estimation of CH_4 emissions, including those related to the degree of treatment utilization by

Sector	Explanation
	population class (domestic wastewater) and the fraction applied for different types of wastewater treatment and discharge pathways (industrial wastewater), for the entire time series.