
Turkey is to Impose Additional Financial Obligations for Recycling of the Products Endangering the Environment

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Introduction

Turkey published certain amendments to its Environment Law no. 2872 ("**Amending Law**") on 10.12.2018 and brought additional financial obligations in the form of a "*Recycling Contribution Fee*" for manufacturers, importers, and consumers of products endangering the environment if not recycled, such as tires, plastic packages, batteries, herbal oil, etc.

Many of those manufacturers and importers have already had certain obligations such as collecting and disposing their products presented to the market. The language of the Amending Law suggests that the new financial obligations will be added on the top of the already existing obligations with limited exceptions for the companies implementing deposit-refund systems. However, the Amending Law also provides that new regulations will provide further information as to how those obligations will be applied in practice.

We will in this article (i) discuss the additional financial obligations in the form of a "*Recycling Contribution Fee*", (ii) present the administrative fines under the Amending Law, and (iii) provide a full list of the products subject to the fees.

Recycling Contribution Fee

The Amending Law provides a list of products which are subject to a recycling contribution fee to be paid by manufacturers and importers. According to the Amending Law, importers and manufacturers supplying the products concerned to the Turkish market to report the amount of their recycling contribution fees until the 15th day of each month after the supply of the concerned product in the market. Then, these companies are obliged to pay the fees to the competent administrative body until the end of the second month following the declaration.

Additionally, the Amending Law foresees a mandatory deposit refund system for certain packages, which the competent administrative body will later on determine. The concerned deposit refund system will come into force in January 2021 and the companies implementing a deposit refund system may be exempted from paying the recycling contribution fees.

The Amending Law puts certain financial obligation on the customers as well. In this regard, it envisages that the customers should pay a fee to be determined by the competent administrative

body for the plastic bags at the point of sales. The fee is to be updated annually with a 0.25 TRY lower limit.

Please see the list includes the products subject to the recycling contribution fees at the end of this Article.

Administrative Fines

In case of incompliance with the Amending Law, the following administrative fines will be imposed:

- 120% of the recycling contribution fees for the companies failing to pay the Recycling Contribution Fee.
- TRY 100 per tonne for the companies failing the implement the mandatory deposit refund system.
- TRY 10 per square meter of the store for the companies failing to charge the fee for the plastic bags.

The List of the Products Subject to Recycling Contribution Fees

Recycling Contribution Fees	
Product Description	Amount
Plastic Bag (Plastic Shopping Bag)	TRY 0.15/Quantity
Tire (Passenger Car)	TRY 2/Quantity
Tire (Bus, Truck, Van, Loader and Excavator and Others)	TRY 4/Quantity
Tire (Construction Equipment)	TRY 10/Quantity
Solid Tire	TRY 5/Quantity
Accumulator (Lead-Acid)	TRY 0.20/Kg
Accumulator (Nickel-Cadmium Type)	TRY 0.50/Kg
Accumulator (Others)	TRY 0.05/Kg
Zinc-Carbon Battery	TRY 2/Kg
Alkali Cylindrical Battery	TRY 2/Kg
Alkali Button Battery	TRY 3/Kg
Button Battery (Zinc-air and silver oxide)	TRY 10/Kg
Lithium Button Battery	TRY 10/Kg
Lithium Cylindrical Chargeable and Primary Battery (Vehicle Batteries Excluded)	TRY 5/Kg
Automotive Battery (Lead Containing Cells Excluded)	TRY 15/Kg
Lithium Containing Automotive Batteries	TRY 15/Kg
Other Chargeable Batteries	TRY 5/Kg
Mineral Oil	TRY 0.50/Kg
Herbal Oil	TRY 0.10/Kg

Electric and Electronic Products: TV/Monitor	TRY 0.20/Kg
Electric and Electronic Products: Data Processing Telecommunication Equipment (TV and Monitors Excluded)	TRY 0.20 Kg
Electric and Electronic Products: Lighting Equipment	TRY 0.10/Quantity
Electric and Electronic Products: Small House Appliances and Others	TRY 0.20/Kg
Electric and Electronic Products: White Appliances (Refrigerator/Cooler/Air Conditioner Excluded)	TRY 0.25/Kg
Electric and Electronic Products: Refrigerator/Cooler/Air Conditioner	TRY 30/Kg
Medicine	TRY 0.01/Bottle or Box

Product Description	Amount Per Kg (TRY)	Amount Per Quantity (TRY)
Plastic Packages		
Beverage Packages (Quantity)		
Up to 0.33 Litres		0.01
Between 0.3301-0.75 Litres		0.02
Between 0.7501-1.5 Litres		0.03
Above 1.1501 Litres		0.04
Others	0.40	
(Plastic Bags Excluded) (Kg)		
Metal Packages		
Beverage Packages (Quantity)		0.03
Others (kg)	0.50	
Composite Packages		
Mainly Paper-Cardboard Packages (Quantity)		
Up to 0.25 Litres		0.01
Between 0.2501-0.5 Litres		0.02
Above 0.501 Litres		0.04
Others (Kg)	0.50	
Paper and Cardboard Packages (Kg)	0.20	
Glass Packages		
Beverage Packages (Kg)		
Up to 0.25 Litres		0.01
Between 0.2501-0.5 Litres		0.02
Between 0.501-1 Litres		0.03
Between 1.01-5 Litres		0.05
Above 5.01 Litres		0.10

Others (kg)	0.20	
Wooden Packages		
Wooden Packages (Quantity)		0.10