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European Waste Trade with Turkey: Roadmap to Sustainability or a False Promise?

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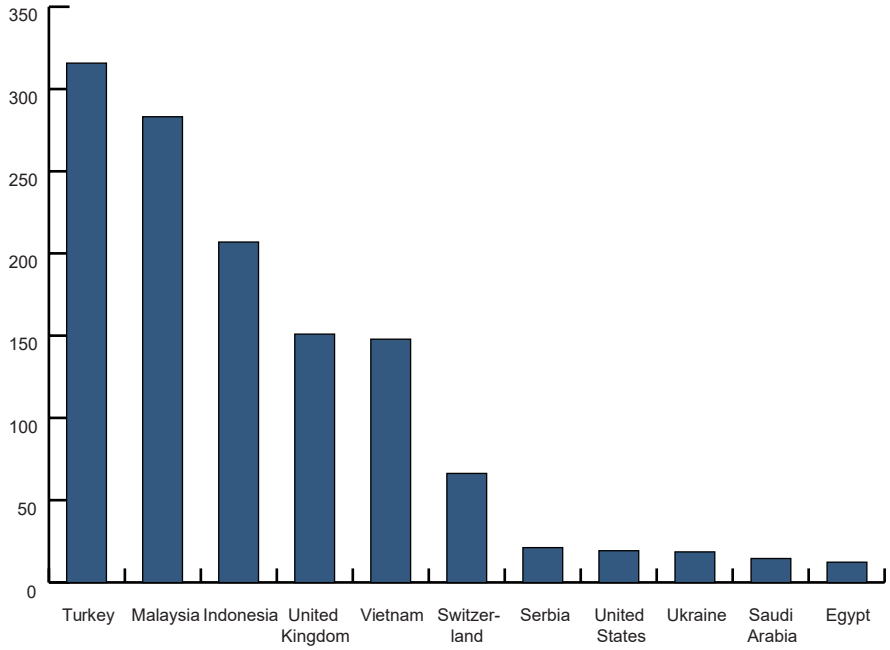
Summary

Turkey has emerged as the primary destination for the European Union(EU)'s plastic waste following China's 2018 ban on waste imports. While Turkish authorities frame waste imports as an economic opportunity, the environmental and human health consequences remain largely unaddressed. The governing Justice and Development Party (AKP) promotes the waste trade as a contribution to the green and circular economy, despite evidence of widespread illegal dumping and burning practices. Indeed, this transboundary mobilization of waste between continents highlights the inconsistencies between the EU's environmental goals and its continued reliance on waste exports, ultimately resulting in the export of environmental injustice.

The Issue

Governments around the world are facing an intensifying crisis related to waste production. Under the guise of "recycling", many countries in the Global North, including the United States, Canada, Japan, the United Kingdom, and members of the European Union, export waste to nations with weak environmental regulations, low labor costs, and minimal oversight of environmental and labor rights violations. A significant portion of exported waste from the Global North consists of low-quality, contaminated, and hard-to-recycle materials, particularly plastics, which are expensive to process domestically. For exporting countries, it is economically advantageous to outsource these labor-intensive recycling processes to Global South countries. Meanwhile, recipient countries often view waste imports as an economic opportunity, ignoring the severe environmental consequences. This practice enables Global North countries to externalize the health, environmental, and economic costs of their consumption and production, perpetuating environmental injustices between nations and continents.

Within the EU, recycling and the circular economy—an economic model of production and consumption that focuses on maximizing the use of existing materials and products through practices like sharing, leasing, reusing, repairing, refurbishing, and recycling to extend their lifespan—are often promoted as key strategies to address rising waste production. However, a substantial amount of waste designated for recycling is exported due to the high costs and environmental challenges of domestic processing. Until 2018, China was the



Main destinations for plastic waste exports from the European Union (EU 27) in 2023, by country in 1,000 metric tons

primary destination for European waste imports. However, the Chinese government's 2017 National Sword policy banned the import of certain solid wastes, including most plastic waste. Following this policy shift, Turkey emerged as the largest importer of EU waste, processing nearly half of all EU plastic waste exports by 2020.

The Turkish government portrays this trade as a step toward a green and circular economy. In March 2021, Turkey even received the Global Goals Action Award from the United Nations Development Program (UNDP) for its Zero-Waste Program, which claims to align with the United Nations Sustainable Development Goals by promoting responsible consumption and production. Government officials often avoid referring to these imports as "waste," instead describing them as "clean and qualified raw materials" essential for domestic production. However, investigations by journalists and non-governmental organizations (NGOs) have exposed widespread illegal activities in the waste trade, including the burning and dumping of imported waste instead of recycling it.

A BBC investigation in June 2020 first brought these practices to light. A journalist tracked plastic waste from a supermarket in England by placing GPS trackers in three garbage bags in London. These bags were later discovered in Adana, Turkey, a city known for its concentration of recycling facilities. The investigation revealed that large amounts of British plastic waste were being dumped and burned by roadsides rather than recycled. Subsequent reports by Greenpeace Germany (2021), Greenpeace Mediterranean (2022), and Human Rights Watch (2022) further documented the harmful consequences of illegal burning and dumping of imported waste in Turkey, discussed below.

Analysis

The practice of exporting waste contradicts the sustainability and circular economy principles that the EU advocates. This approach undermines the "Principle of Proximity" which states that waste should be managed as close to its source as possible to minimize environmental impact. The EU has introduced various measures to address plastic production and consumption, including bans on single-use plastics and updates to the Basel Convention through the EU Waste Shipment Agreement. The latest initiative, the Waste Shipment Regulation, governs the transboundary movement of waste within the EU, aiming to enhance oversight and regulation of the waste trade. The agreement, revised in 2024, includes stricter regulations on waste exports. By 2026, the EU will ban the shipment of non-hazardous plastic waste to non-OECD countries and continue prohibiting member states from exporting waste for disposal and hazardous waste intended for recovery to non-OECD nations. However, it remains uncertain whether Turkey, as an OECD member, will continue to serve as a major destination for European plastic waste. The European Commission will monitor exports to OECD countries, focusing on plastic waste, and will suspend shipments if environmental concerns arise, but since the report assessing Turkey's waste management has not yet been released, the future of this trade remains uncertain.

Turkey, a signatory to the Basel Convention, pro-



Plastic waste found by Greenpeace in Adana province in Turkey. 2021. Photograph: Caner GUEVERA/Greenpeace/PA. Source: Greenpeace

hibits waste imports intended for disposal. Legally, imported waste is allowed only for recycling. However, according to the Union of Chambers of Turkish Engineers and Architects, approximately 50% of waste imported from the EU is unrecyclable. Non-recyclable or hard-to-recycle waste often enters the country through the mislabeling of hazardous materials as non-hazardous or via other false declarations. Workers in Turkey's plastic waste management facilities report handling potentially hazardous waste that is inaccurately labeled as non-hazardous. This creates opportunities for criminal activities within the waste trade, including the trade of hazardous or non-recyclable waste, as well as their improper treatment.

The lack of adequate regulatory enforcement and recycling infrastructure in Turkey exacerbates the problem. The OECD's "Environment at a Glance 2020" report indicates that Turkey's recycling rate is only 10%, one of the lowest among OECD countries. Additionally, Turkey's municipal solid waste recovery rate was just 12% in 2018, far below the EU-27 average of 48%. According to the "Plastic Pollution Policy Country Profile: Turkey" report (2022), out of the 3.7 million tons of plastic waste generated or imported annually, only 6% is recycled. Most waste—61%—ends up in landfills, while 33% (over 1.1 million tons) remains uncollected or is openly dumped. Notably, much of Turkey's recycling capacity is allocated to imported waste rather than domestic waste.

Turkey attempted to regulate waste imports, particularly mixed plastics, and promote domestic recycling by imposing temporary bans and reducing the allowable capacity for processing imported plastic waste in 2021. However, these attempts were withdrawn due to pressure from industry stakeholders. Transparency issues persist, with inconsistent and unavailable data on the types and quantities of imported waste. Additionally, the privatization of ports reduces oversight, and insufficient personnel to inspect imports makes it difficult to ensure that only recyclable plastics enter the country. The Ministry of Environment, Urbanization, and Climate Change plays a central role in issuing permits, monitoring compliance, and enforcing penalties for non-compliance. However, the absence of independent regulatory bodies raises concerns about potential crony-capitalist relationships between private companies and the government.

Implications

The illegal dumping and open burning of imported plastic waste have devastating consequences for both human health and the environment. Non-recyclable plastics often end up in unregulated dumpsites or are incinerated, releasing toxic chemicals into the air, soil, and water. Greenpeace Mediterranean (2022) has documented the contamination of water resources, including the Mediterranean Sea, where Turkey accounts for 16.8% of European marine plastic pollution. Rivers such as the Seyhan and Ceyhan, which flow into the Mediterranean, are heavily polluted with plastic waste, endangering marine ecosystems and food safety.

Illicit waste practices also degrade soil quality and harm biodiversity. Plastics release microplastics and toxic substances into agricultural lands, affecting crop yields and potentially entering the food chain. Meanwhile, Greenpeace Germany (2021) reported pollution of waterways with microplastics, frequent landfill fires releasing harmful substances, and severe ecosystem damage. The health risks include exposure to carcinogenic materials and other toxic substances, leading to long-term serious health problems in communities near waste sites, including respiratory and chronic illnesses, reproductive disorders, and cancer.

According to HRW (2022), workers in recycling facilities face additional health risks due to inadequate protective equipment. Many are exposed to hazardous substances, leading to chronic respiratory conditions and an elevated risk of cancer. Migrant workers, who constitute a significant portion of the labor force in this sector, are particularly vulnerable as they often lack legal protections and adequate health care.

Further Reading

» **Ezgi Ediboğlu Sakowsky and Sedat Gündoğdu, "An Imported Problem?" in *Plastic Waste Trade*, edited by Sedat Gündoğdu (Springer, 2024), https://doi.org/10.1007/978-3-031-51358-9_11.**

» **Eva Romée van der Marel, "Trading Plastic Waste in a Global Economy: Soundly Regulated by the Basel Convention?" Journal of Environmental Law 34, no. 3, (2022): 477–497, https://doi.org/10.1093/jel/eqac017.**

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Takeaways

- Despite the amendments in the Waste Shipment Regulation that ban the export of non-hazardous plastic waste to non-OECD countries, the EU continues to face challenges in fully addressing the environmental impact of waste exports. Enforcement, lack of transparency, and the waste management capacity of the receiving countries remain key concerns in ensuring the effectiveness of the stricter regulations. As Turkey is an OECD country, the future of waste trade between the EU and Turkey remains uncertain.

- The EU should prioritize domestic recycling and end its reliance on exports to ensure compliance with the principle of proximity. Reducing waste and plastic production are essential steps in addressing the dramatically increased volume of waste.

- Turkey, already struggling to manage and recycle its own waste, lacks an independent regulatory body and effective oversight. Weak enforcement and inadequate inspections enable illegal practices such as the dumping and burning of imported waste.

- The EU-Turkey waste trade has caused significant environmental harm, including pollution of the Mediterranean Sea, soil degradation, and air contamination. These impacts threaten ecosystems, marine biodiversity, and human and environmental health in the country.

- The waste crisis transcends national borders and demands a global response. This action must be inclusive and participatory, including the insights and expertise of grassroots initiatives, NGOs, and academics.

About the SUITS policy brief

This policy brief aims contribute to a broad and well-researched understanding of Turkey and Turkish affairs through presenting a variety of voices on current issues and the foundational moments that impact today. The aim is to provide policy makes and others the tools to make informed decisions.

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Burcu Binbuğa is a postdoctoral researcher and Humboldt fellow at the Soft Authoritarianisms Research Group, Department of Anthropology and Cultural Research, and the Sustainability Research Center (artec) at the University of Bremen. Her research project, “Phantom Environmentalism: Waste Trade and the Political Economy of Authoritarianism in Turkey”, examines the working of the political economy in current authoritarian Turkey, drawing the example of waste trade between European countries and Turkey.

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