



This project is co-funded by the European Union  
and the Republic of Türkiye



# ACQUIS AUDIT

2022







# The Turkey – EU Business Dialogue (TEBD) Project

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The **Turkey-EU Business Dialogue** (TEBD) is a project co-funded by the European Union under its IPA II programme with Turkey. TEBD is managed by EUROCHAMBRES, through a grant contract with CFCU, in close cooperation with TOBB, as the end beneficiary institution of the project. The TEBD activities are implemented through the European and Turkish Chambers of Commerce and Industry, and Commodity Exchanges.

The overall objective of the project is to strengthen mutual knowledge and understanding between Turkish Chambers and Commodity Exchanges, and their counterparts in the EU, thus promoting the integration of EU and Turkish business communities and ensuring a stronger awareness of the opportunities and challenges of a potential future Turkey's accession to the EU in both Turkey and the EU.

The TEBD project wants to promote a constructive private sector dialogue between the EU and Turkey that will lead to positive and lasting results for both sides.

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## EUROCHAMBRES

Avenue des Arts 19 A/D  
B – 1000 Brussels  
Belgium  
Tel : +32 (0)2 282 0850  
Fax : +32 (0)2 230 0038

## TOBB

Dumlupınar Bulvarı No:252  
(Eskişehir Yolu 9.km), 06530 ANKARA  
Turkey  
Tel.: +90 312 218 20 00  
Fax: +90 312 218 23 84

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# I. The EU Acquis Audit – Introduction & Summary

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We are delighted to share with you the results of the Acquis Audit which is a detailed report on the compliance of Turkish companies towards certain areas of the acquis Communautaire.

The aim of the Acquis audit activity is twofold:

1. To develop a consultancy program for local Chambers in Turkey to assist companies in the implementation of specific EU Legislation.
2. To provide detailed information on the Turkish companies' level of compliance in the selected sectors to the policy makers in Turkey and in the EU.

The EU Acquis audit tool kit, which was initiated under previous programmes (ETCF I & II) implemented by EUROCHAMBRES in cooperation with TOBB, was developed and introduced to the Turkish Chamber Network. The TEBD Team, with the support of network experts, developed a “diagnostic tool-kit”, which were detailed checklists, translating relevant EU legislation into a series of questions for the companies. Such checklists allowed the companies to assess to what extent they comply with relevant EU legislation, decided by EUROCHAMBRES & TOBB for the benefit of the Turkish Chambers Network.

In the context of TEBD, around 208 Turkish companies were audited on their compliance with 3 specific EU topics by 25 Turkish experts, from local chambers selected by EUROCHAMBRES and TOBB, trained and assisted by 3 international experts from the EU:

**Antonija BORZIC CERAR** | Expert on Environmental Legislation  
*Slovenia Chamber of Commerce and Industry*  
*“Acquis” services in the field of sustainable production and trade*

Ms Bozic Cerar graduated from Metallurgy at University of Ljubljana Faculty of Natural Sciences and Engineering. She currently works as a senior consultant in the Environment Protection Department of Ljubljana CCI. Her job description covers environmental issues relevant to the business community i.e. mainly industrial pollution, with emphasis on integral pollution prevention and control, prevention of major accidents and volatile organic compounds, among others. She is also representing the viewpoint of the business community with regard to new or changing environmental legislation. She is an active consultant to Slovene companies and is a member of the environmental sector group at EEN.

**Birgitt DECKERS** | Innovation Consultant  
*VOKA – Chamber of Commerce and Industry Limburg*  
*“Acquis” services in the field of industrial products covered by “CE-marking”*

Ms Deckers is a proud owner of a Master's degree in Science, Industrial Design. Over the past 7 years, She has been working as a Product Design Engineer and Innovation Manager in both SME and multinational companies. Hereby she has built an extensive hands-on experience with EU standards and methods for product design and manufacturing. She has been worked as an Innovation Consultant at the Chambers of Commerce and Industry in Belgium. She gave advice and develop educational programmes for their members regarding technology, industry 4.0, business model innovation and circular economy.

**Luc VAN LOOVEREN** | Senior Advisor on EU Relations  
*VOKA – Chamber of Commerce and Industry Antwerp-Waasland*  
*“Acquis” services in the field of agri-food products*

Mr Van Looveren has an MA in applied economic sciences with a specialization in International Economic and Diplomatic Relations. He has more than 30 years of experience in following business related ‘Acquis Communautaire’. He was for many years responsible for the operations of a Euro Info Center at VOKA. In the past 20 years, he was involved in a wide range of projects in Central and Eastern Europe, Turkey and some Asian countries. As a trainer, he developed in these projects practical courses for staff members of CCI, aimed at getting familiar with EU import rules, including market access requirements for various products. In 2018, he received a best practice award for trainings in the field of internationalization from the European Training Foundation in Turin, for a course on EU market access requirements for agri-food products.

The team of 3 experts from the EU have translated the latest relevant EU Legislation into a series of questions for the companies, the so-called checklists (See annex 1,2,3 attached to this report).

The 3 checklists developed by the 3 EU experts, previously decided and agreed with all the partners, covered the following sectors:

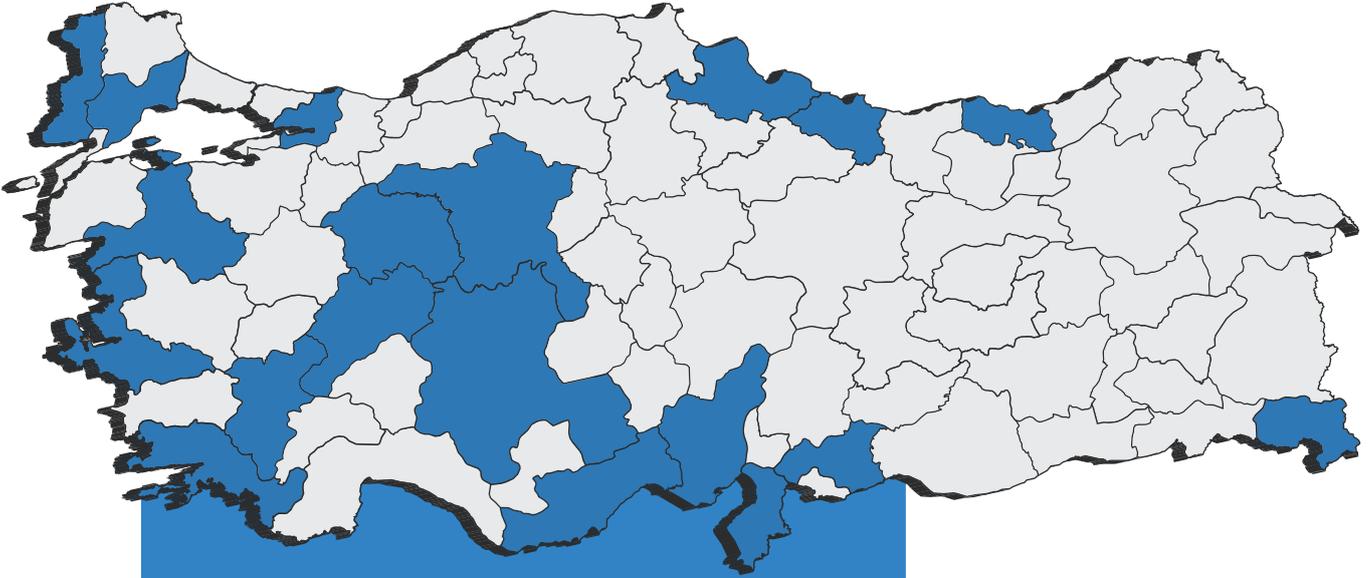
- **TOOLKIT 1: “Acquis” services in the field of Agri-food products (Annex 1)**
- **TOOLKIT 2: “Acquis” services in the field of industrial products covered by “CE-Marking” (Annex 2)**
- **TOOLKIT 3: “Acquis” services in the field of Sustainable Production and Trade (Annex 3)**

25 Turkish experts from regional-local Chambers selected by EUROCHAMBRES and TOBB, were trained on the EU Legislation covering the 3 main topics mentioned above during a four-day training programme that took place in Ankara, from 17 -21 June 2019.

An information campaign targeting Turkish local enterprises was launched by the Turkish Chambers which resulted in the selection of around 208 companies that were screened by the Turkish experts. Several companies showed their interest on being “audit” in more than one topic. In total, we reached the figure of 285 checklists filled in by Turkish Companies. The Turkish Chamber experts helped the companies on filling the checklists, some of them through company visits.

On the basis of the audit results, the Turkish experts provided the companies with information and advices where necessary on the legislation to be implemented or modified. The audit results are the basis of this comprehensive report which is published by EUROCHAMBRES and TOBB on the level of compliance of the companies in the 3 mentioned topics and including specific recommendations improving the level of compliance on EU legislation and the understanding between both business communities.

# II. Turkey Map of Participating Chambers



1. Adana Chamber of Commerce
2. Afyonkarahisar Chamber of Commerce and Industry
3. Ankara Chamber of Industry
4. Balıkesir Commodity Exchange
5. Bandırma Chamber of Commerce
6. Çerkezköy Chamber of Commerce and Industry
7. Denizli Commodity Exchange
8. Dörtöyl Chamber of Trade and Industry
9. Edirne Commodity Exchange
10. Eskişehir Chamber of Industry
11. Fethiye Chamber of Commerce & Industry
12. Gaziantep Chamber of Commerce
13. Gaziantep Chamber of Industry
14. İzmir Chamber of Commerce
15. İzmir Commodity Exchange
16. Kocaeli Chamber of Industry
17. Konya Chamber of Commerce
18. Ordu Commodity Exchange
19. Samsun Chamber of Commerce and Industry
20. Tarsus Chamber of Commerce and Industry
21. Tarsus Commodity Exchange
22. Trabzon Chamber of Commerce and Industry
23. Ankara Chamber of Commerce
24. Çorlu Chamber of Commerce and Industry
25. Yüksekova Chamber of Commerce and Industry

# III. Analysis of results of “Acquis Communautaire” audit interviews with Turkish Enterprises in 2019 in the framework of the TEBD Project

## 1. Subject: EU “Acquis Communautaire” in the field of Agricultural Products and foodstuffs

### 1.1. Introduction

In the course of 2019 a group of 25 staff members of the Turkish network of Chambers of Commerce and Industry and Commodity Exchanges received a training from EU experts in using “Acquis Communautaire” checklists for verifying if Turkish enterprises were implementing relevant “acquis” measures.

In such an “acquis” checklist on EU laws for agri-food products, a wide range of topics regulated under EU legislation were divided into chapters and subchapters. Trained Turkish staff received a basic understanding of each of these topics. They were also assisted by some example cases, allowing to get a practical view on selecting areas of the “acquis” that could be important for a company operating in a certain agri-food area.

93 Turkish companies were assisted by the trained Turkish Chamber staff in completing this agri-food “acquis” checklist. The overall picture of topics marked as relevant showed that the training achieved its goal of transferring a sound basic knowledge and understanding about the complex field of the EU’s agri-food “acquis”. In other words, there could be the case that interviewers fulfilled these audits in a good way with only minor mistakes in terms of selecting relevant topics during interviews.

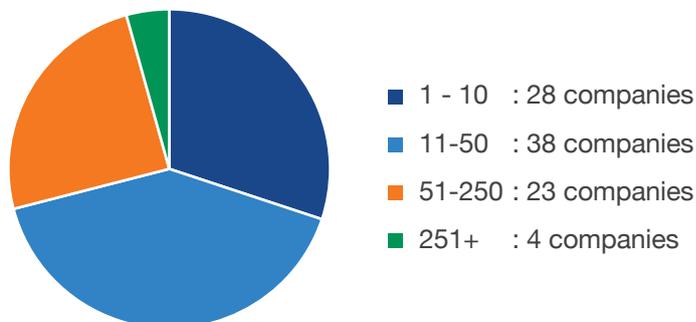
This report aims to sum up some interesting findings from the “acquis” audits and to formulate recommendations for Turkish business support organizations, public institutions and other stakeholders interested in raising awareness and developing understanding about EU agri-food measures.

## 1.2. Overview of number and size of Turkish enterprises which participated in the “acquis” for Agri-food products.

93 Turkish producers, distributors and catering companies of various types of agri-food products participated in the “acquis” audits for Agri-food. The table below shows that this concerns, with the exception of 4 companies, only small and medium-sized enterprises<sup>1</sup> with a maximum of 250 employees.

Graph 1: population of audited enterprises, division by number of employees

### SIZE OF COMPANIES: NUMBER OF EMPLOYEES



## 1.3. Analysis of “acquis” audit results, with a main focus on “acquis” measures touching a substantial number of audited enterprises.

### 1.3.1. Agricultural products – Common organisation of agricultural markets and markets in fishery and aquaculture products in the EU

77 companies answered to be involved in one or several of the more than 20 product groups covered by this Single Common Market Organisation (CMO) Regulation for agricultural products. And 11 companies confirmed to fall under the scope of the CMO for fishery and aquaculture products.

A large majority of these companies answered to have knowledge of the EU’s legal framework. However, none of them marked to implement already these rules.

One explanation may be that all audited companies were still selling in Turkey only and were not yet exporting to the EU. In that case, companies did not yet have to implement specific marketing standards for products covered under this legislation.

However, it would be useful for Turkish CCI to monitor this topic in order to inform local enterprises timely, especially about future changes in the Customs Union EU-Turkey. These changes may lead to easier EU market access (e.g. a reduction of remaining EU import duties for agricultural products).

### 1.3.2. Foodstuffs legislation – technical rules for specific production methods

A very low number of audited companies appeared to be involved in the following three areas for which EU legislation was worked out:

- Quick-frozen foodstuffs
- Ionizing radiation
- Use of novel foods or novel foods ingredients, GMOs

15 companies replied to be involved in producing / trading quick-frozen foodstuffs. Here, again, nearly each company confirmed to have knowledge of the EU’s legal requirements in this field. But none of them appeared to be implementing these rules.

There was not one single audited company using ionizing radiation.

2 companies using novel foods, novel foods ingredients or GMOs indicated not implementing EU rules in this specific field.

As mentioned under 1.3.1. it may be useful to check with these enterprises if the absence of “implementation” can be explained by the fact that companies only sell locally and maybe not (yet) want to prepare for exporting to the EU.

<sup>1</sup> The definition of SMEs can be found here: [https://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition\\_en](https://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition_en)

### 1.3.3. Foodstuffs legislation – technical and labeling rules for foodstuffs for specific nutritional uses, incl. rules for food supplements & adding of vitamins & minerals to foodstuffs

This analysis relates to EU measures in following areas:

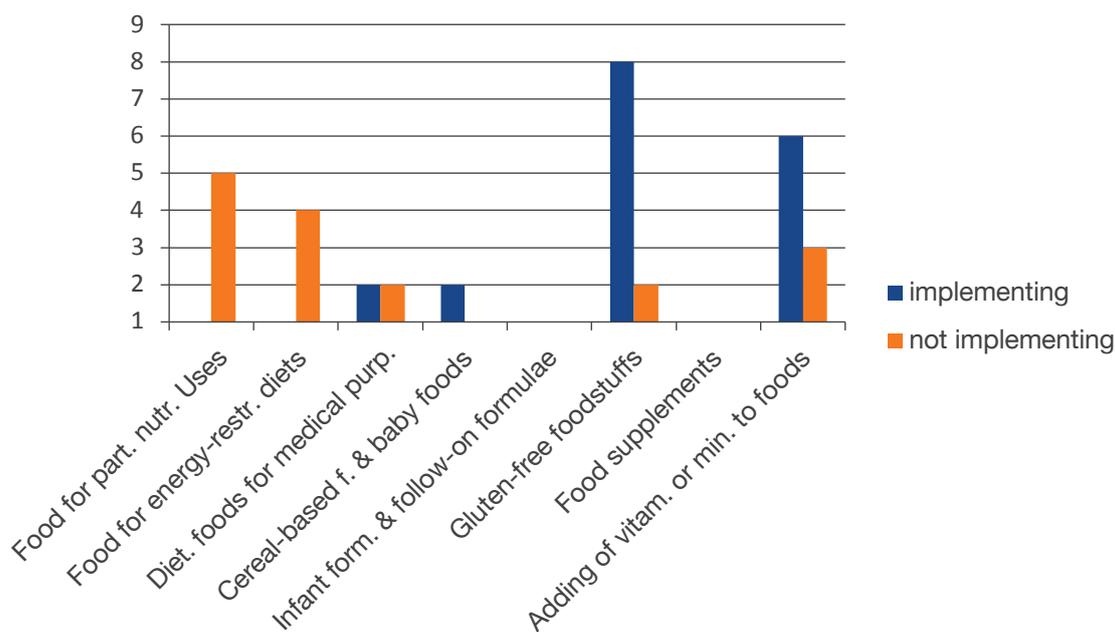
- Food for particular nutritional uses (framework legislation)
- Food for energy-restricted diets
- Dietary foods for medical purposes
- Cereal-based foodstuffs & baby foods for infants & young children
- Infant formulae & follow-on formulae
- Gluten-free foodstuffs
- Food supplements
- Adding of vitamins or minerals to foods

The graph below indicates that for only a small number of audited companies some relevant matters could be identified.

Companies producing food for particular nutritional uses such as food for energy-restricted diets for weight reduction appeared not yet implementing EU rules for these specific products.

An interesting result from this audit seems to be the high percentage of companies producing gluten-free products and applying already EU rules in this specific area. And a significant majority of companies (5 out of 7) adding vitamins or minerals to foodstuffs replied implementing EU rules related to this activity.

Graph 2: Implementation of EU legislation in the field of food for particular nutritional uses, by number of companies

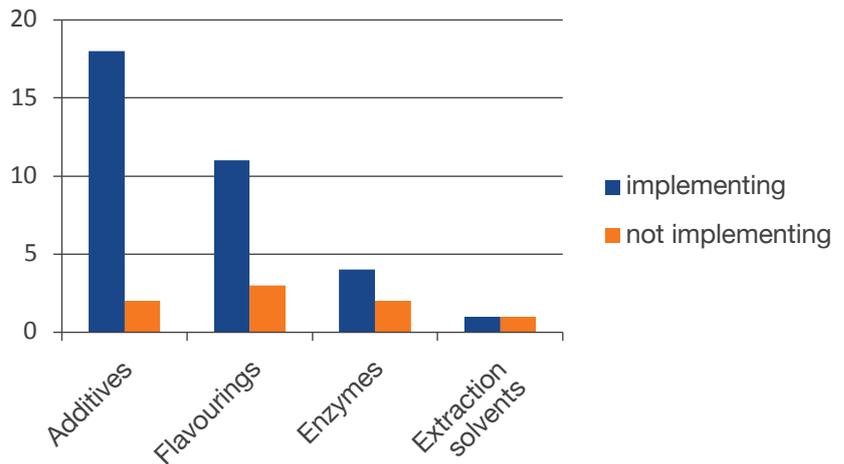


### 1.3.4. Foodstuffs legislation – technical and labeling rules on the use of additives, flavourings, enzymes and extraction solvents

The audit showed that Turkish companies using additives, flavourings, enzymes or extraction solvents were well informed about “acquis” rules.

Graph 3 shows that 18 out of 20 companies (90 %) indicated implementing “acquis” rules for additives. 11 out of 14 audited companies (79 %) stated implementing “acquis” measures in the field of authorized flavourings. 4 out of 6 companies (67 %) answered implementing “acquis” rules for enzymes. And one out of two companies using extraction solvents (50 %) replied implementing EU rules in this field.

Graph 3: Implementation of EU rules in the field of additives, flavourings, enzymes and extraction solvents



### 1.3.5. Foodstuffs legislation – ‘vertical’ rules with technical and labeling requirements for various types of foodstuffs

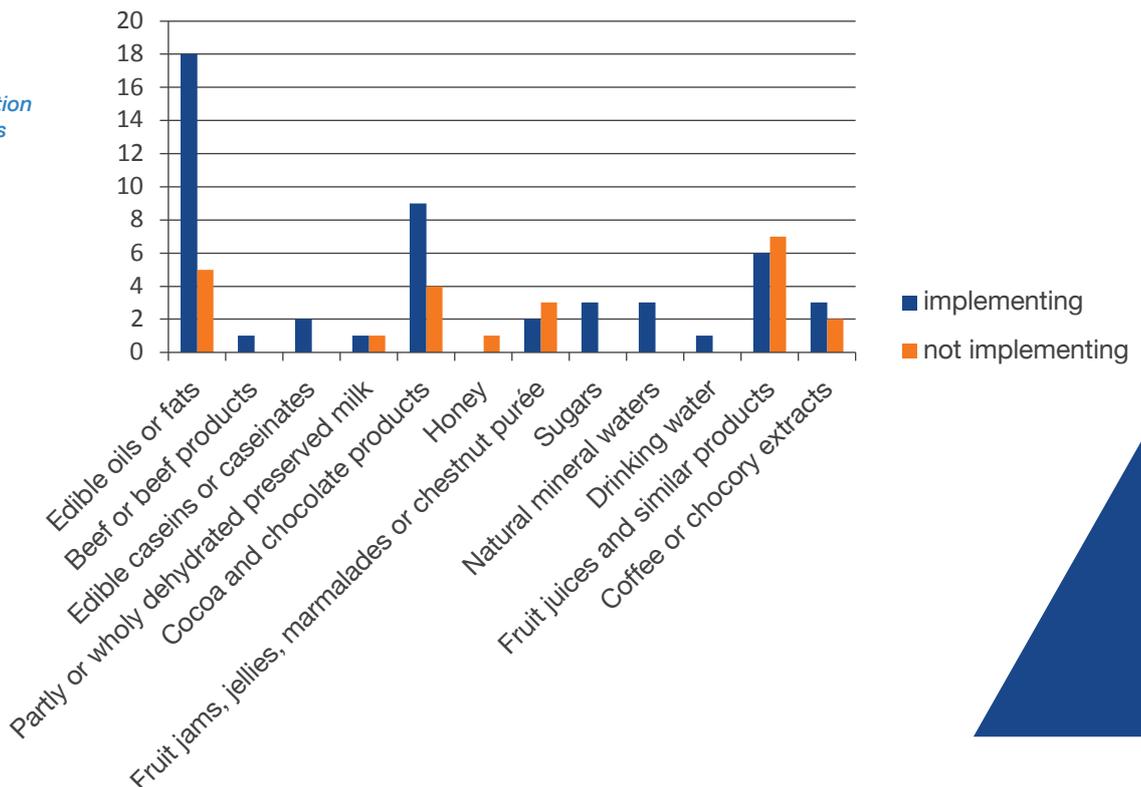
Graph 4 shows how well audited Turkish companies are implementing legislation in the “acquis communautaire” that is only relevant for certain foodstuffs.

This concerns legislation holding technical and labelling measures for products such as: edible oils and fats; beef and beef products; milk derivatives such as edible caseins or caseinates and partly or wholly dehydrated milk; cocoa and chocolate; honey; fruit jams, jellies, marmalade or chestnut purée; sugars; natural mineral water; drinking water; fruit juices and similar products; and coffee and chicory extracts.

23 audited companies were operating in the sector of vegetable oils or fats. 18 out of these sample group (78 %) confirmed implementing “acquis” measures. This implies a good understanding of maximum amounts of erucic acid in these products, a typical technical element in the EU legislation for vegetable oils.

13 audited companies mentioned producing or distributing chocolate products with 9 companies (69 %) implementing the EU’s chocolate directive. Another 13 audited companies appeared to be involved in fruit juices with 6 companies (46 %) implementing the directive with technical and labelling requirements in this field. These results show that some awareness and training in these specific food sectors could help increasing the degree of implementation and readiness for exporting to the EU.

Graph 4: implementation of EU rules for various foodstuffs



### 1.3.6. Foodstuffs legislation – hygiene of foodstuffs (incl. HACCP, traceability, etc.)

This topic, hygiene in agri-food companies, is of a very high importance in this “acquis” audit since all audited enterprises are involved. This means that 93 audited enterprises answered the questions related to this subject. Results are presented in Graph 5 and commented as follows.

#### A. Foodstuffs legislation - general food hygiene package

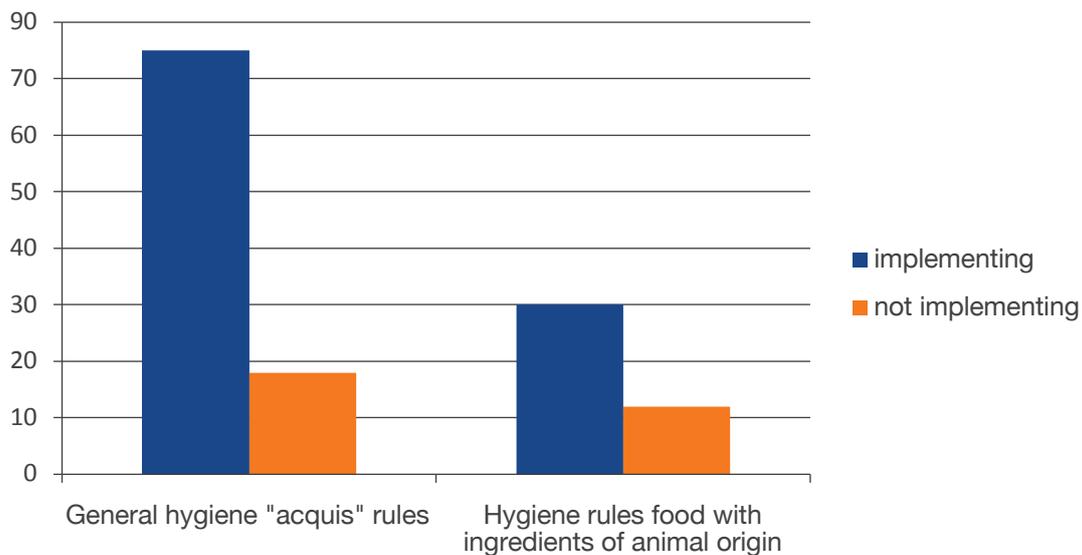
75 out of 93 companies (81 %) confirmed to be implementing the general EU hygiene package. This means that they are familiar with essential hygiene monitoring aspects such as Hazard Analysis and Critical Control Point (HACCP).

#### B. Foodstuffs legislation – hygiene rules for foodstuffs with ingredients of animal origin

30 out of 42 enterprises operating in the sector of foodstuffs with ingredients of animal origin indicated implementing the “acquis” in this field.

Turkish SMEs interested in exploring opportunities for exporting to the EU and not yet complying with the EU’s “acquis” in the field of hygiene need to invest in implementing these rules. Companies working in some of these specific sectors with food prepared with ingredients of animal origin need to implement the two legislative packages (general / animal) before they can declare to their authorities to be “ready”. Hereafter, they will be controlled and, in case of a positive result, will receive an approval number for their establishment. When reaching this stage, Turkish SMEs in such specific sectors can start exporting to the EU for sectors declared open for trade between Turkey and the EU.

Graph 5: implementation of the EU's rules on agri-food hygiene



### 1.3.7. Foodstuffs legislation – contaminants and MRLs of pesticides and veterinary medicinal products

For 84 audited companies the question on the “acquis” on contaminants in agricultural products and foodstuffs seemed to be relevant. This concerns contaminants such as: nitrates, lead, cadmium, mercury, aflatoxins, dioxins, etc. This topic is less relevant for audited companies working as a restaurant or offering catering services. See also Graph 6.

51 companies (61 %) indicated implementing EU rules in this field.

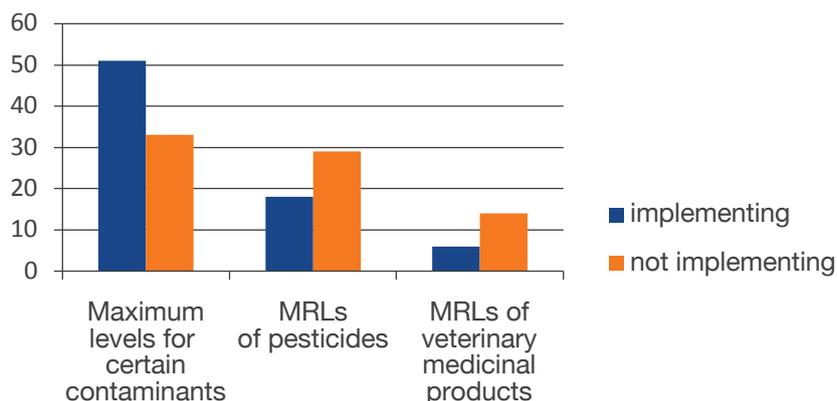
In the field of MRLs (Maximum Residue Limits) of pesticides, 18 out of 47 companies (38 %) involved in this field confirmed to be implementing MRL rules. 20 companies appeared to be involved in production of food with animal ingredients.

Regarding the question on MRLs of veterinary medicinal products. 6 of them (30 %) confirmed to be implementing rules in this field.

These statistical results show that additional efforts from the side of Turkish CCI or other institutions, such as trainings or information campaigns on contaminants and MRLs in agri-food products, could prove to be useful for increasing levels of “acquis” implementation.

Remark: this topic in the checklist is one of the more complex issues. There is a chance that some audited companies did not perceive well the difference between the legislation on maximum levels for certain contaminants in foodstuffs on one hand and the rules on MRLs – of pesticides and veterinary medicinal products – on the other hand. Therefore, some error margin needs to be taken into account when analyzing these figures.

Graph 6: Implementation of EU rules in the field of contaminants



### 1.3.8. Foodstuffs legislation – labeling rules

#### A. General (‘horizontal’) rules on labelling of foodstuffs

This part of the audit concerned 4 pieces of EU legislation, namely:

- general rules for labelling, presentation and advertising of foodstuffs
- rules on the identification of prepacked foodstuffs by lot
- rules on nutrition values
- rules on nutrition or health claims

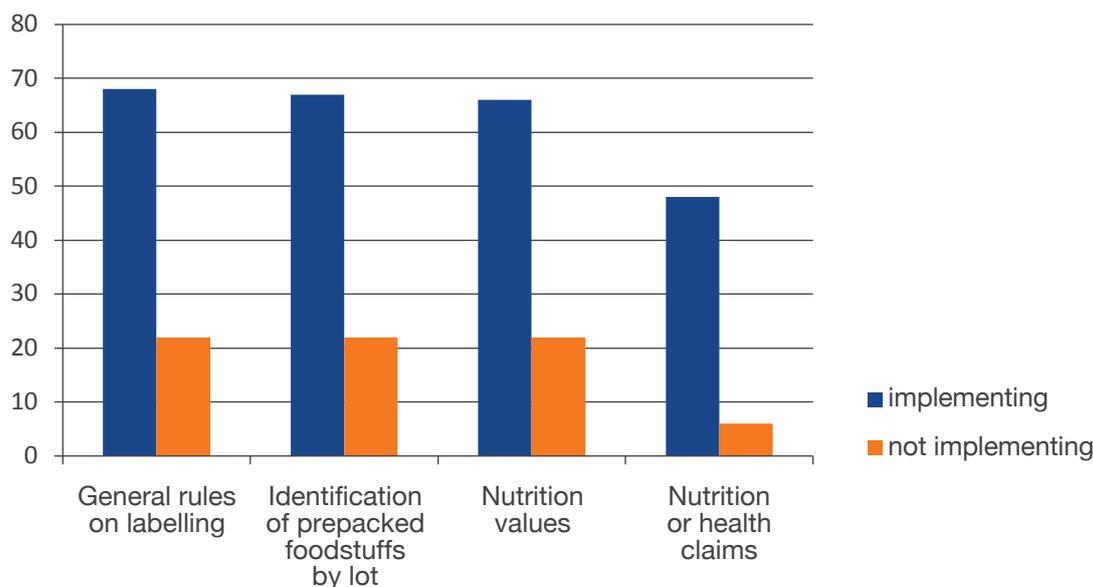
90 Turkish companies answered the question on the general rules for labeling of foodstuffs. 68 (76 %) are implementing EU measures in this field.

As regards the three other subjects, implementing percentages reach the figures:

- 75 % for rules on identification of prepacked foodstuffs by lot
- 75 % for rules on nutrition values
- 89 % for rules on nutrition or health claims

These results are presented below in Graph 7. Results in this field show quite high percentages of implementation but indicate also that a substantial number of Turkish companies still need to work on this topic when looking at opportunities for exporting to the EU.

Graph 7: Implementation of horizontal labelling rules for foodstuffs

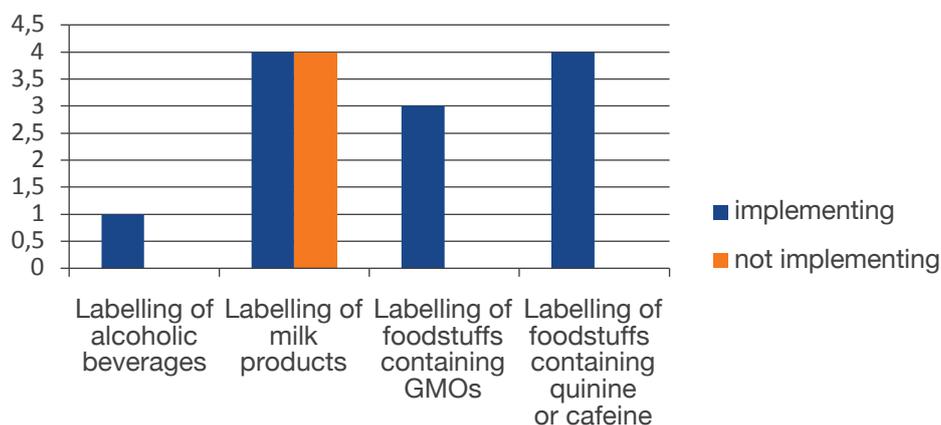


### B. Labelling rules for certain categories of foodstuffs

Auditing of some Turkish producers or distributors of alcoholic drinks, milk and milk products, foodstuffs containing GMOs and foodstuffs containing quinine or caffeine showed a very high level of implementation of “acquis” rules.

However, only 4 out of 8 companies (50%) producing milk products confirmed to be implementing “acquis” measures. Therefore, a recommendation could be given to raise awareness about EU rules for labelling of dairy products.

Graph 8: Implementation of vertical labelling rules for some categories of foodstuffs



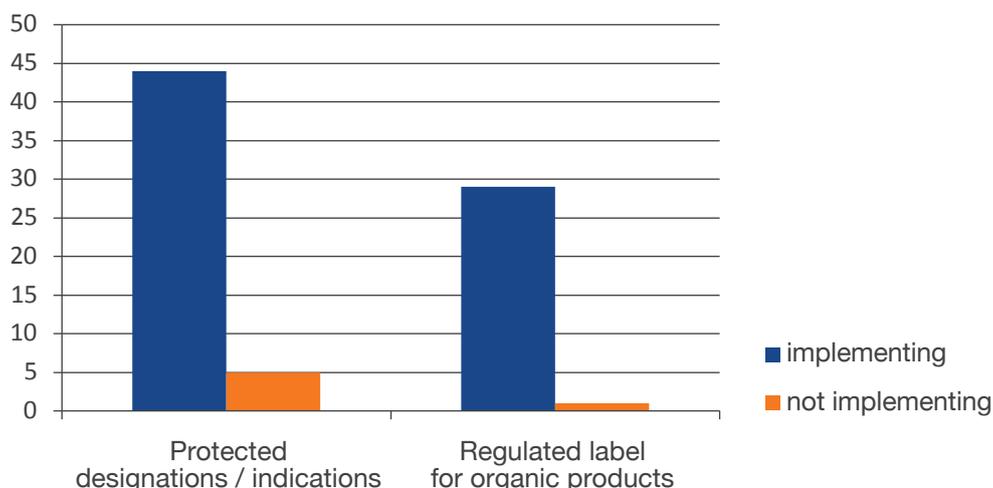
### C. Labelling rules for protected geographical or other regulated indications, e.g. for organic production

From the total population of 93 audited companies, 49 indicated to be using some geographical or other regulated labels on their products. 44 of them (90 %) answered to be implementing rules in this field.

This means that there are not many risks that Turkish exporters would use some protected names, e.g. Protected Designations of Origin (PDOs), which can only be used by producers in certain European regions.

29 out of 30 companies (97 %) indicating to be involved in (or interested in) organic production stated to be implementing EU rules in this field. See Graph 9.

Graph 9: Implementation of “acquis” in the field of protected designations (e.g. geographical names) or labels (e.g. for organic production)



In other words, a high number of audited companies indicated implementing EU rules in the field of organic production. It may be useful to verify if this really means that these companies obtained a certificate from a certification body confirming their compliance with these rules.

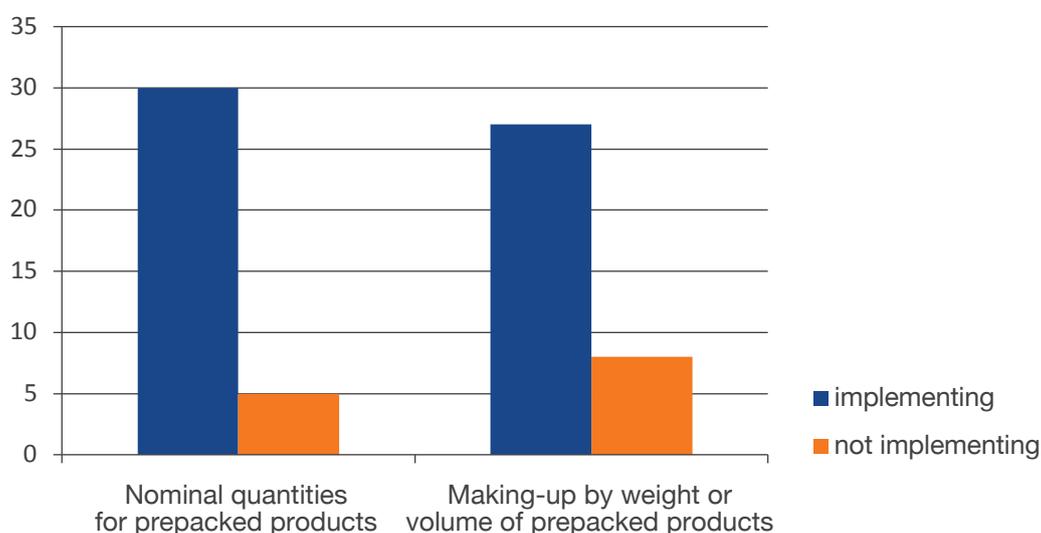
### 1.3.9. Foodstuffs legislation - packaging rules

#### A. Packaging rules for prepacked foodstuffs or drinks

35 out of 93 companies confirmed that they produce prepacked foodstuffs or drinks in predetermined quantities. Enterprises were asked whether they were implementing EU rules on nominal quantities for prepacked products and on the making-up by weight or by volume of certain prepacked products. Implementation of this last mentioned EU law allows manufacturers to put the European Economic Community (EEC) mark on their packaging (next to the indication of the volume or weight). This is a sign for showing accurate filling-up of prepacked foodstuffs.

Graph 10 indicates that 30 out of 35 companies (86 %) are implementing rules on nominal quantities and 27 out of 35 companies (77 %) are implementing rules on the making-up by weight or volume.

Graph 10: Implementation of “acquis” in the field of prepacked foodstuffs and drinks



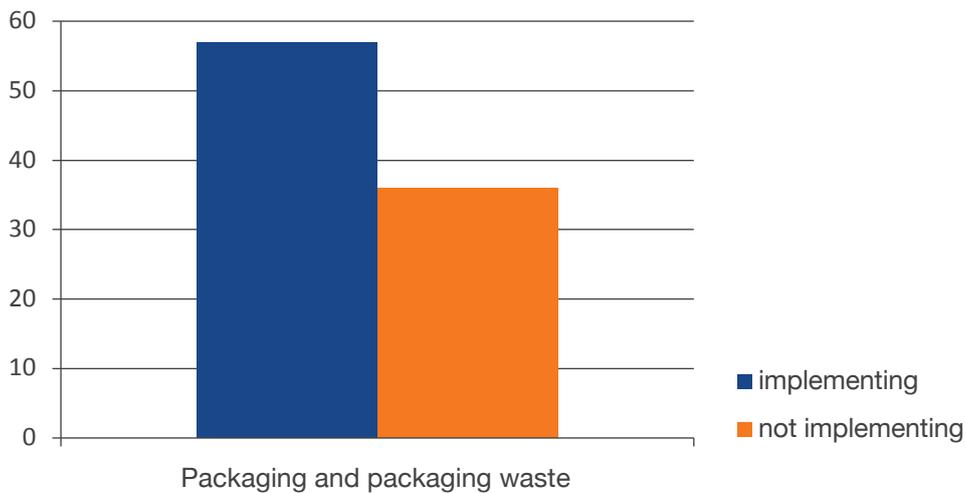
## B. Packaging and packaging waste

A topic of relevance for the whole audited population of Turkish enterprises concerns the EU Directive on packaging and packaging waste. Turkish exporters need to understand which packaging recovery organizations are active in EU Member States. They need to discuss with EU importers who will register at such an organization and which logo of such an organization needs to be put on the packaging of the products.

57 out of 93 audited companies (61 %) appeared to implement this legislation.

This means that information campaigns on this aspect of preparing agri-food products from a legal point of view for exporting to the EU can still reach a significant number of Turkish enterprises who are not yet familiar with this topic.

Graph 11: Implementation of “acquis” in the field of packaging and packaging waste



## C. Food contact materials

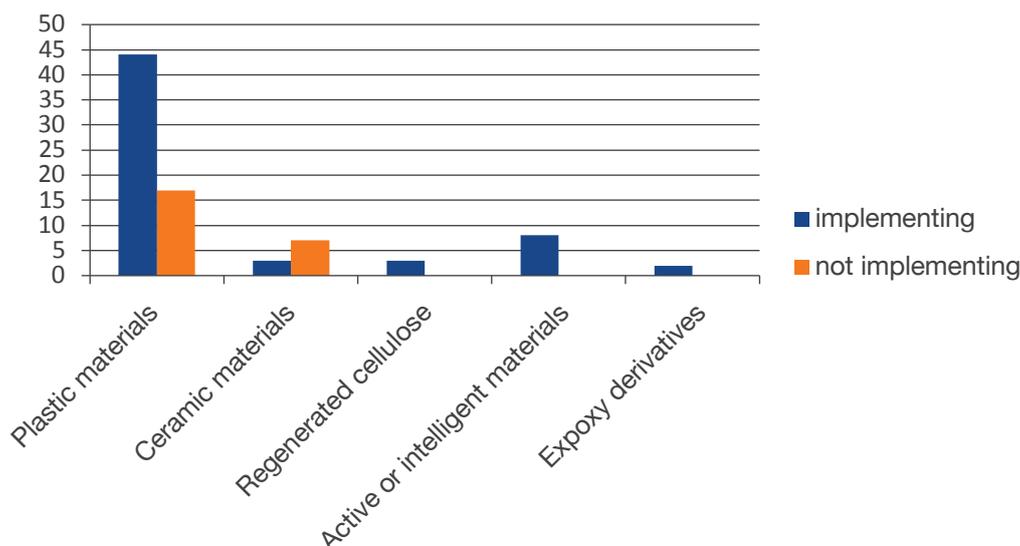
A last topic in the audit checklist on EU rules for agricultural products and foodstuffs concerned legislation in the field of food contact materials. This topic refers especially to packaging which immediately touches the food products. These packaging materials need to be safe whereby only authorized materials are allowed and maximum migration limits are respected.

61 companies indicated to be involved in the use of plastic food contact (packaging) materials. 44 of them (72%) indicated to be implementing the legislation in this field.

This implies that they receive from their supplier of plastic packaging material a Declaration of Conformity including a reference to EU laws concerned.

Other materials were only used in a small number of companies (see Graph 12). In the field of ceramic food contact materials indicated a majority of companies involved, namely 7 out of 10 (70 %), not to be aware of EU legislation in this field. These rules relate to maximum migration limits for toxic elements such as lead.

Graph 12: Implementation of “acquis” in the field of food contact materials



### 1.3.10. Conclusions

As a general conclusion it could be mentioned that for nearly all subjects in the “acquis” checklist on agricultural products and foodstuffs high percentages of implementation of EU laws could be noted. However, there still appeared to be a number of companies not to be aware yet of – and therefore not yet implementing – certain EU rules.

Based on the findings of this “acquis” audit, Turkish CCI and Commodity Exchanges could continue using the “acquis” checklist on EU agri-food “acquis” as a practical tool in their daily work, e.g. their services to companies, in order to help them to strengthen their readiness for doing business with the EU.

The advice can be also given to competent authorities in Turkey to support enterprises to participate in such “acquis” audits or similar awareness raising or training activities that are organized by Turkish business support organizations.

These organizations could complete such “acquis” audits by presenting to assisted enterprises summaries or full texts of relevant EU laws or Turkish laws incorporating these “acquis measures”. And to offer their assistance in clarifying obligations for economic operators.

Furthermore, it could be useful to organize seminars on some topics of the agri-food “acquis” which are relevant for a high number of enterprises. Hereby, it could be mentioned:

- Hygiene rules: general rules and rules for food with ingredients of animal origin
- getting your company ready for an approval of your establishment;
- Contaminant rules and Maximum Residue Level (MRLs) of pesticides and veterinary medicinal products;
- Packaging and packaging waste
- Food Contact Materials

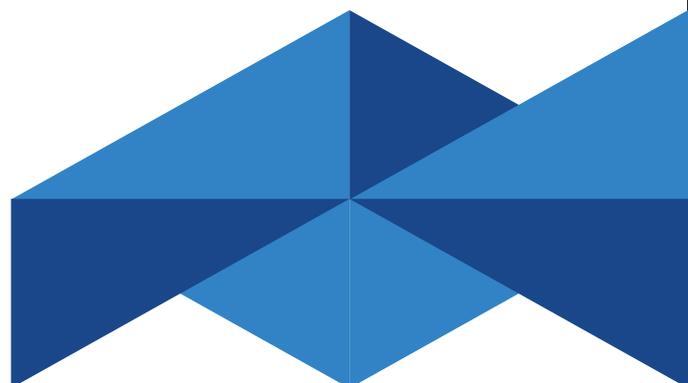
Finally, it could be highlighted that this type of audits are a good method for a regular check and upgrade of knowledge on EU “acquis” measures, as well for business support organizations such as Turkish CCI and Commodity Exchanges as for SMEs as final beneficiaries who need to keep an overview of relevant legislation and organize its implementation at their company level.

Annex: Table with summarized results of “acquis” audit

## RESULTS “ACQUIS” CHECKLIST AGRI-FOOD LEGISLATION

QUESTION	TOPIC	RESULTS MARKED AT 93 CHECKLISTS				
		RELEVANT (A)	NOT RELEVANT / NOT INVOLVED (B)	IF RELEVANT, IMPLEMENTED? (I)	I/A * 100	CONTROL (A+B=C)
I.1.1.	CMO agricultural products	77	16	0	0	93
I.2.1.	CMO fishery & aquaculture products	11	82	0	0	93
II.1.1.	Quick-frozen foodstuffs	15	78	0	0	93
II.1.2.	Ionising radiation treatment	0	93	0		93
II.1.3.	Novel foods & GMOs	2	91	0	0	93
II.2.1.	Foodstuffs for particular nutritional uses	4	89	0	0	93
II.2.2.	Foodstuffs intended for use in energy-restricted diets for weight reduction	3	90	0	0	93
II.2.3.	Dietary foods for special medical purposes	2	91	1	50	93
II.2.4.	Cereal-based foods and baby-foods for infants and young children	1	92	1	100	93
II.2.5.	Infant formulae and follow-on formulae	0	93			93
II.2.6.	Gluten-free foodstuffs	8	85	7	88	93
II.2.7.	Food supplements	0	93			93
II.2.8.	Adding of vitamins or minerals to foods	7	86	5	71	93
II.3.1.1.	Additives	20	73	18	90	93
II.3.2.1.	Flavourings	14	79	11	79	93
II.3.3.1.	Food enzymes	6	87	4	67	93
II.3.4.1.	Extraction solvents	2	91	1	50	93
II.4.1.1.1.	Edible oils or fats	23	70	18	78	93
II.4.1.2.	Beef or beef products	1	92	1	100	93
II.4.2.1.	Edible caseins or caseinates	2	91	2	100	93
II.4.2.2.	Partly or wholly dehydrated preserved milk	2	91	1	50	93
II.4.3.1.	Cocoa and chocolate products	13	80	9	69	93
II.4.3.2.	Honey	1	92	0	0	93
II.4.3.3.	Fruit jams, jellies, marmalades or chestnut purée	5	88	2	40	93
II.4.3.4.	Sugars	3	90	3	100	93
II.4.4.1.	Natural mineral waters	3	90	3	100	93
II.4.4.2.	Drinking water	1	92	1	100	93
II.4.4.3.	Fruit juices and similar products	13	80	6	46	93
II.4.5.	Coffee or chocoery extracts	5	88	3	60	93
II.5.1.	Hygiene (general rules)	93		75	81	93
II.5.2.	Hygiene (foodstuffs of animal origin)	42	51	30	71	93
II.6.1.	Maximum levels for certain contaminants in foodstuffs	84	9	51	61	93
II.6.2.1.	Maximum residue levels (MRLs) of pesticides	47	46	18	38	93
II.6.2.2.	Maximum residue levels (MRLs) of veterinary medicinal products	20	73	6	30	93
III.1.1.	General EU rules about labelling, presentation and advertising of foodstuffs	90	3	68	76	93
III.1.2.	Identification or marks identifying the lot to which a foodstuff belongs	89	4	67	75	93
III.1.3.	Nutrition values of the labels of foodstuffs	88	5	66	75	93
III.1.4.	Nutrition or health claims on the labels of foodstuffs	54	39	48	89	93
III.2.1.	Alcoholic drinks	1	92	1	100	93
III.2.2.	Milk or milk products	8	85	4	50	93
III.2.3.	Foodstuffs or food ingredients containing GMOs	3	90	3	100	93
III.2.4.	Foodstuffs containing quinine or caffeine	4	89	4	100	93
III.3.1.	Geographical indications or designations of origin, traditional specialties	49	44	44	90	93
III.3.2.	Organic production of foodstuffs or agricultural products	30	63	29	97	93
IV.1.1.1.	Nominal quantities for prepacked products (deregulation of pack sizes)	35	58	30	86	93
IV.1.2.	Making-up by weight or by volume of certain prepacked products	35	58	27	77	93
IV.2.1.	Packaging and packaging waste	93		57	61	93
IV.3.2.	Food Contact Materials - plastic materials	61	32	44	72	93
IV.3.3.	Food Contact Materials - ceramic articles	10	83	3	30	93
IV.3.4.	Food Contact Materials - materials and articles made of regenerated cellulose film	3	90	3	100	93
IV.3.5.	Food Contact Materials - active or intelligent materials or articles	8	85	8	100	93
IV.3.6.	Food Contact Materials - epoxy derivatives	2	91	2	100	93
IV.3.7.	Food Contact Materials - elastomer or rubber teats or soothers	0	93			93

SIZE OF COMPANIES	NO. OF AUDITED COMPANIES
1 - 10 employees	28
11 - 50 employees	38
51 - 250 employees	23
250+ employees	4
<b>Total no. of audited companies:</b>	<b>93</b>



## 2. Subject: EU “Acquis Communautaire” in the field of Industrial Products covered by “CE Marking”

### 2.1. Background on Turkey and EU legislation regarding industrial products

The “Law No. 4703 relating to the preparation and implementation of technical legislation for products” of 11 July 2001 (Official Gazette No 24459 of 11 July 2001) is the framework law for the production, distribution and marketing of industrial products in Turkey. The law was complemented by four implementing regulations put into force on 11 January 2002:

- Regulation on CE Marking<sup>2</sup>,
- Regulation on Conformity Assessment Bodies and Notified Bodies,
- Regulation on Market Surveillance of the Goods,
- Regulation on the Exchange of Information on Technical Legislation on Goods and Standards between Turkey and the European Union.

After the New Legislative Framework’s entry into force in the EU in 2008, Turkey revised its implementing regulations in order to make it compatible with the EU framework. Today Turkey’s national legislation is almost fully aligned with EU legislation on industrial products. However, EU legislation keeps evolving and therefore Turkish SMEs’ awareness, knowledge and implementation of the latest EU legislation are considered important criteria for doing business with the EU.

### 2.2. Approach

Over 91 Turkish companies were interviewed on their awareness, knowledge and implementation of CE marking for industrial products. The objective was to validate conformity to the latest updates on EU legislation for industrial products.

The assessments were performed by a trained group of professionals from different regional offices of the Turkish Chamber of Commerce and industry. Knowledge was transferred through a short training course conducted in Ankara. The course presented the toolkit consisting of:

- a checklist, divided into three main sections:
  - o general positioning and awareness of the New Legislative Framework
  - o product groups that require CE marking
  - o additional and general legislation for electrical and electronic products
- a presentation in powerpoint including:
  - o examples of all relevant product groups
  - o a step-by-step approach for the CE marking process
- a user manual, giving clear instructions for the expert on how to fill the checklist
- all documentation included hyperlinks to relevant EU legislation texts online

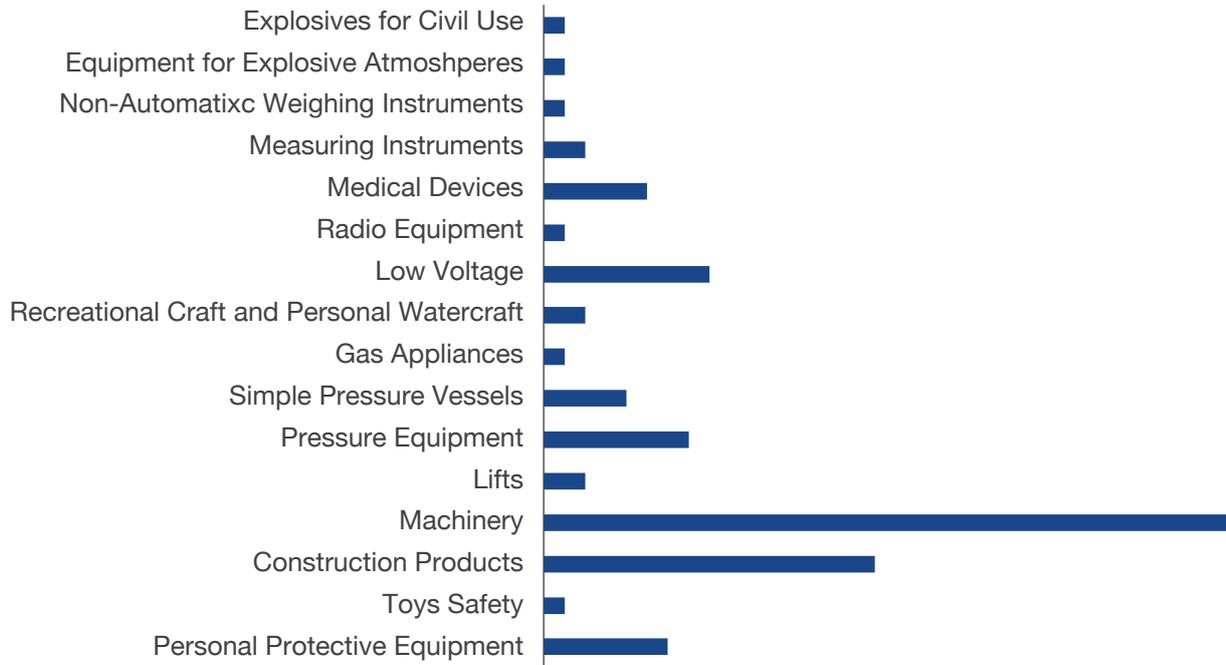
In addition to the training course, the experts were invited to send their specific questions before visiting a company. No additional questions were received from any of the experts.

<sup>2</sup> CE marking is a certification mark that indicates conformity with health, safety, and environmental protection standards for products sold within the European Economic Area (EEA).

### 2.3. Characteristics of the audited companies

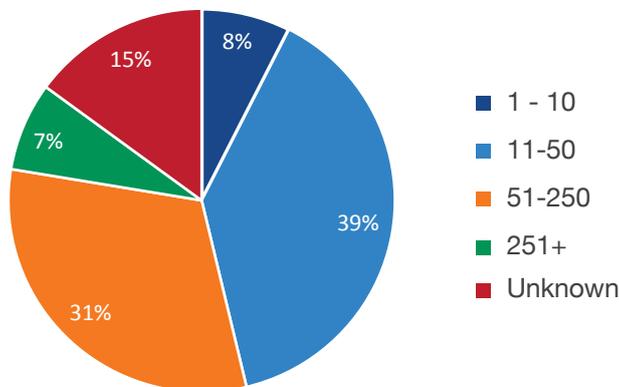
The following summary report is based on the results from 91 checklists filled out by the trained experts in the audited companies. Almost all directives are covered, however for most product groups the number is too low to draw conclusions.

## NUMBER OF COMPANIES PER DIRECTIVE



78% of audited companies are SMEs, only 7% are larger companies. 15% of audited companies didn't provide information on the number of employees.

## COMPANY SIZE



## 2.4. Audit results

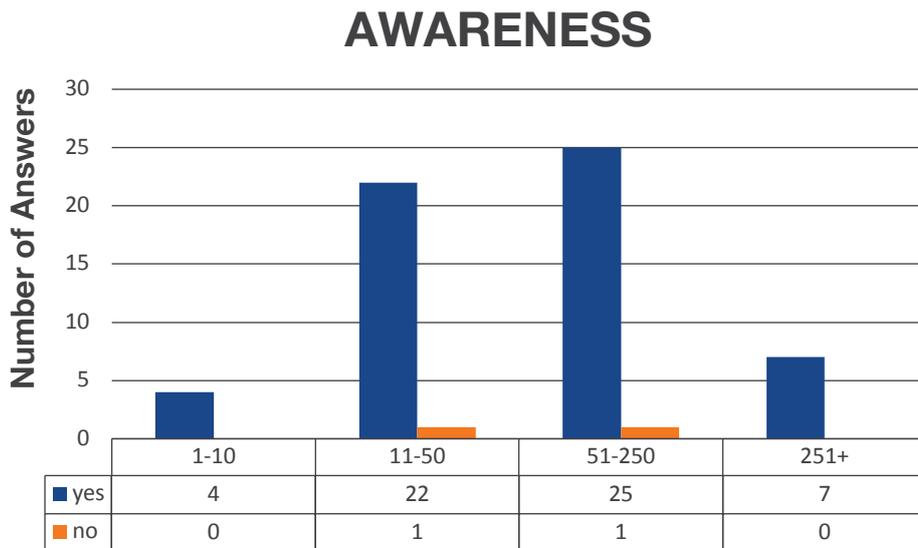
The questionnaires included multiple questions in order to provide information on three pillars to measure compliance with EU regulations:

- Awareness
- Knowledge
- Implementation

The results shown in the graphs are based on the number of answers given by the audited companies. The number of questions differs for each pillar and therefore the results are to be interpreted individually for each pillar. Unfortunately 15% of audited companies didn't give information about the number of employees. Their answers are therefore excluded from the analysis on general positioning and awareness of the NLF (New Legislative Framework). In the product group specific part, the data is included because the dataset is not big enough to give an overview according to company size.

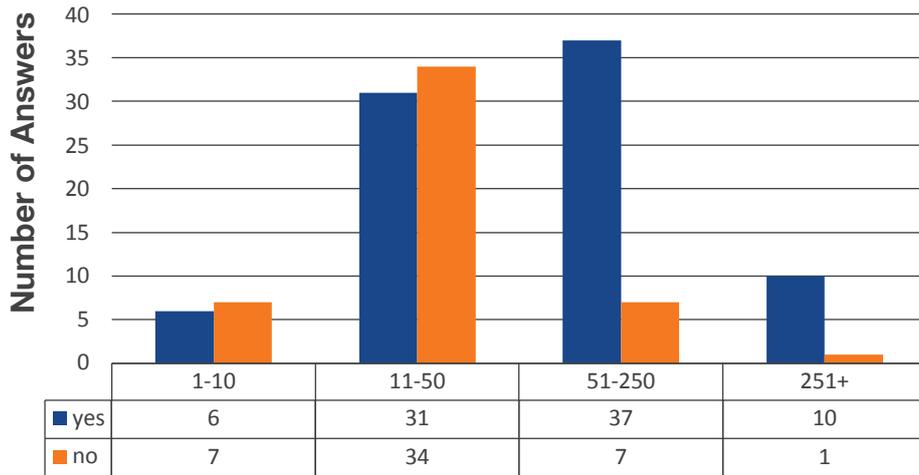
### 2.4.1. General positioning and awareness of the New Legislative Framework

All interviewed companies are awareness of the necessity of CE marking for industrial products and of the responsibilities regarding the essential requirements on product safety and liability. The limited number of negative answers can be considered negligible.



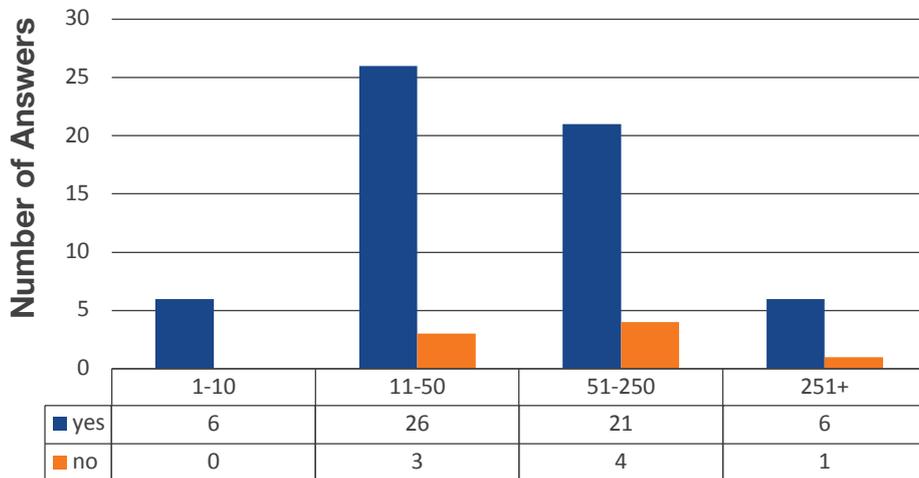
Knowledge on the NLF is high for companies with more than 51 employees. The number of negative answers in the smaller companies could be explained by the level of detail of the set of knowledge questions. The interviewee might not be an expert on the entire process for CE marking and/ or the companies make use of external bodies. The knowledge in the larger companies seems to be higher, probably because they have an internal expert on the topic of CE marking.

## KNOWLEDGE



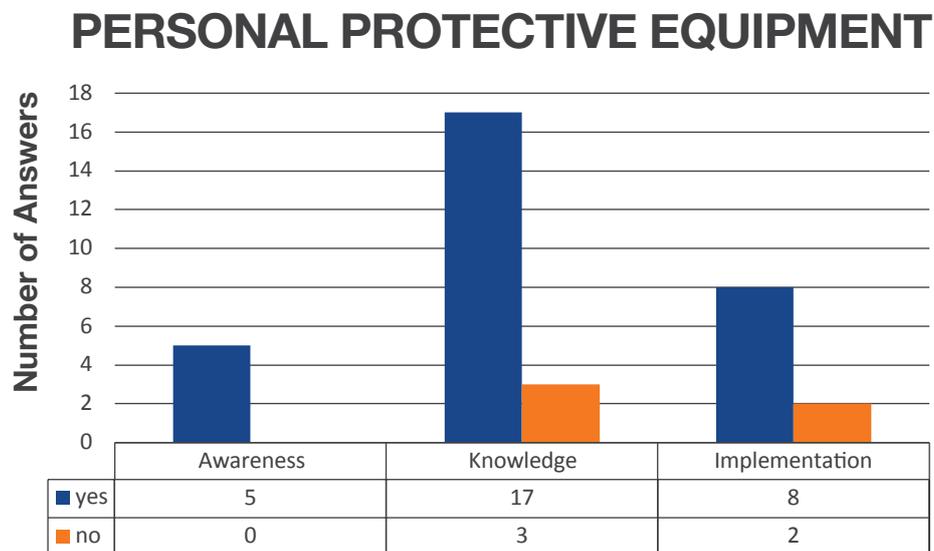
Almost all companies are applying the harmonized standards and have the CE mark affixed to their products. In fact, 9 companies stated they don't export or plan to export to the EU. Due to alignment with the national Turkish legislation, these will have implemented the harmonized standards but have not necessarily affixed the CE mark.

## IMPLEMENTATION



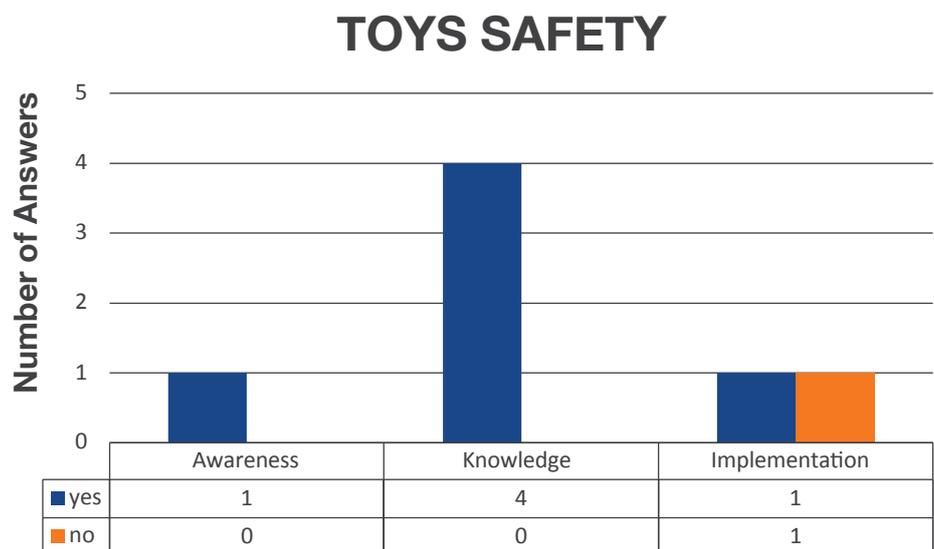
## 2.4.2. Product groups

### A. Personal protective equipment (Reg. (EU) 2016/425)

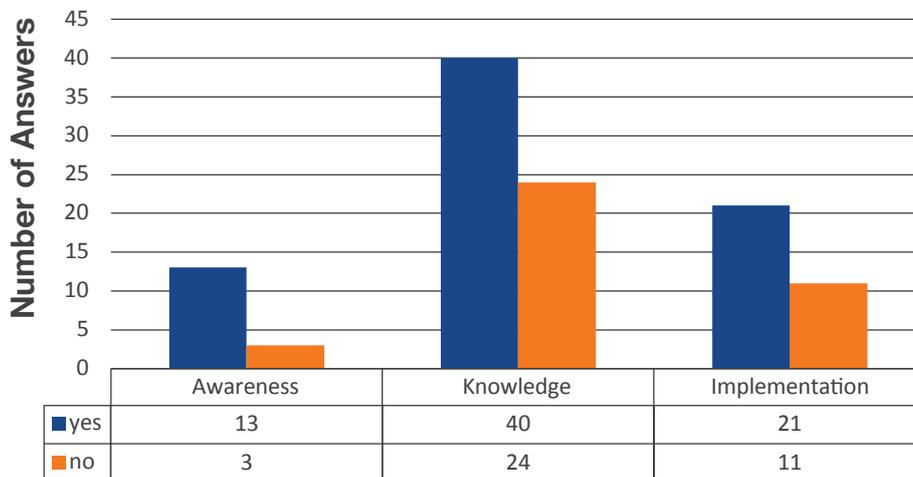


Based on the information found on the websites of the companies, none of the above is actually manufacturing personal protective equipment. It is likely the question was misunderstood and interpreted as “are you using personal protective equipment?”. These results should be considered not valid.

### B. Toys safety (Dir. 2009/48/EC)



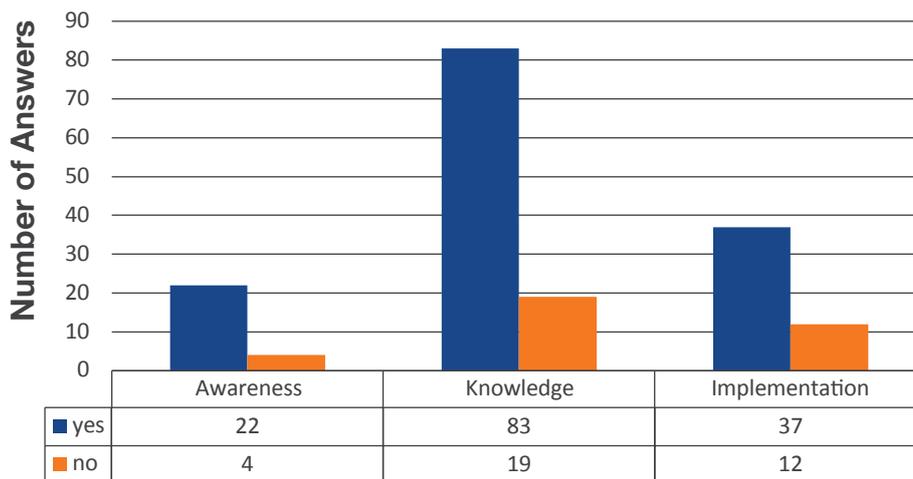
## CONSTRUCTION PRODUCTS



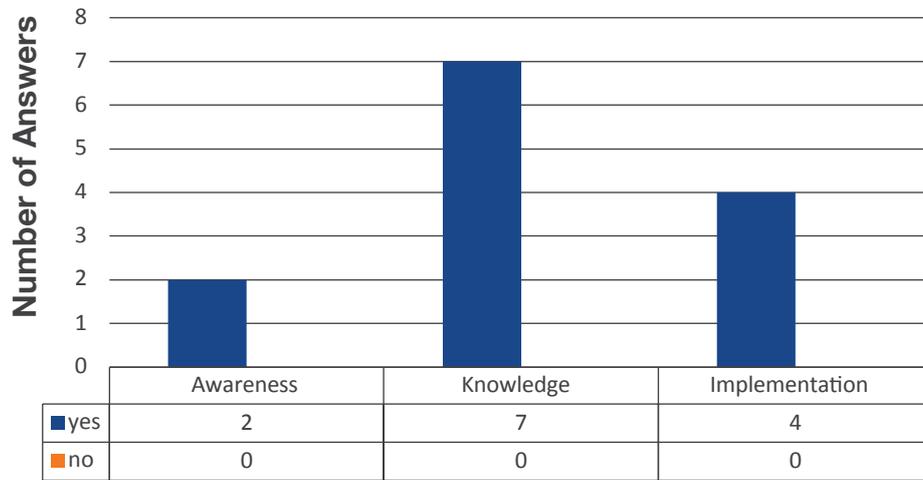
interviewed companies. Some of them don't export and others are producing materials that are out of scope of the construction products regulation. For a clear indication, this group needs to be further investigated.

## D. Machinery (Dir. 2006/42/EC)

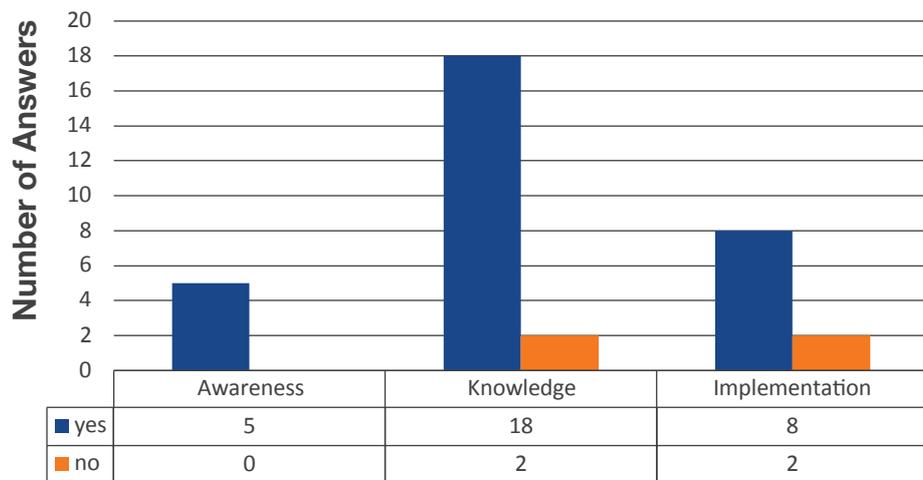
## MACHINERY



## LIFTS

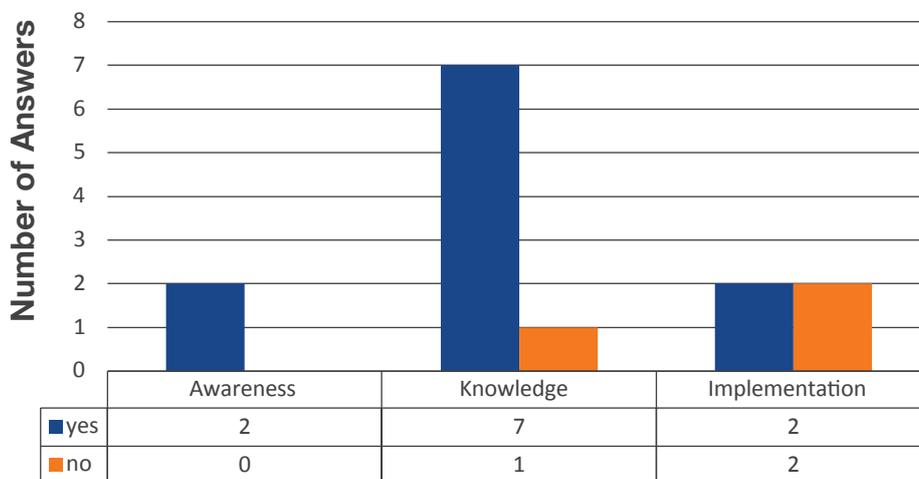


## PRESSURE EQUIPMENT



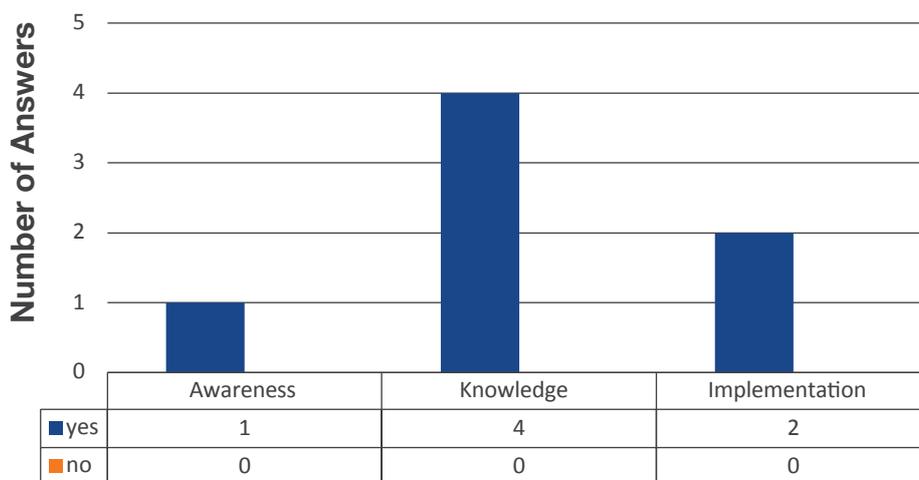
G. Simple pressure vessels (Dir.2014/29/EU)

### SIMPLE PRESSURE VESSELS



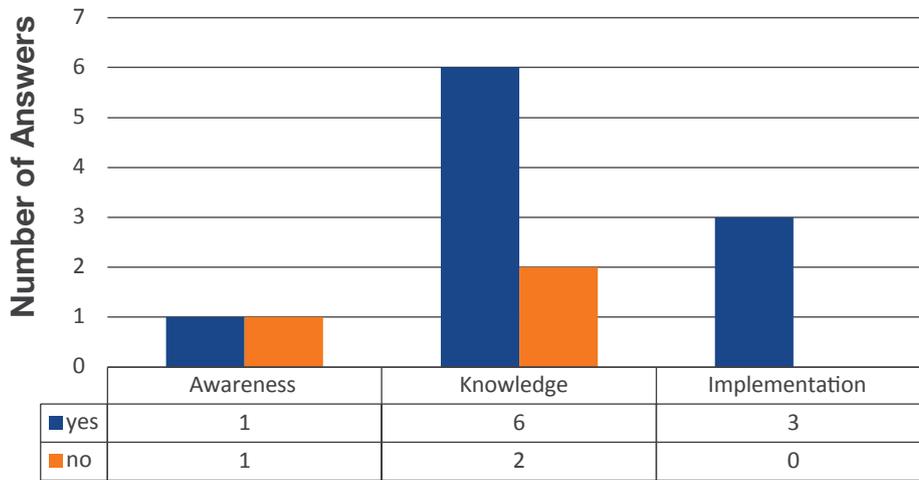
H. Gas appliances (Reg. (EU) 2016/426)

### GAS APPLIANCES



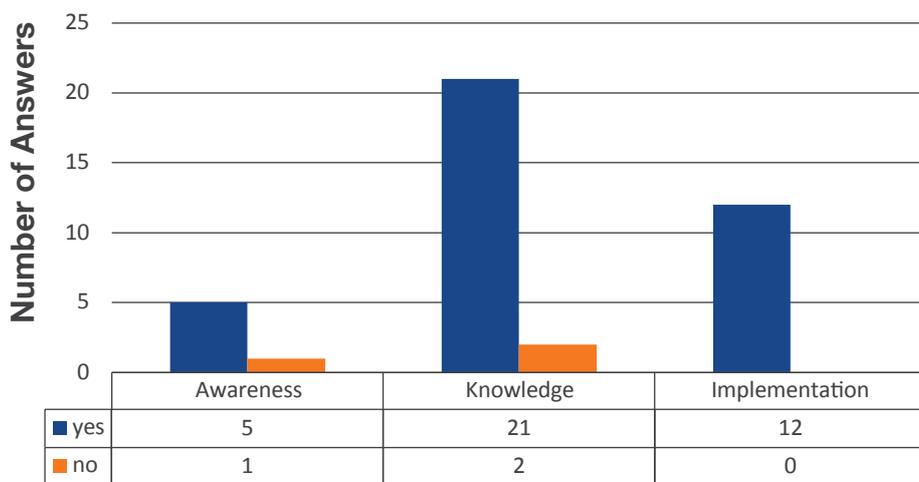
I. Recreational craft and personal watercraft (Dir. 2013/53/EU)

## RECREATIONAL CRAFT AND PERSONAL WATERCRAFT



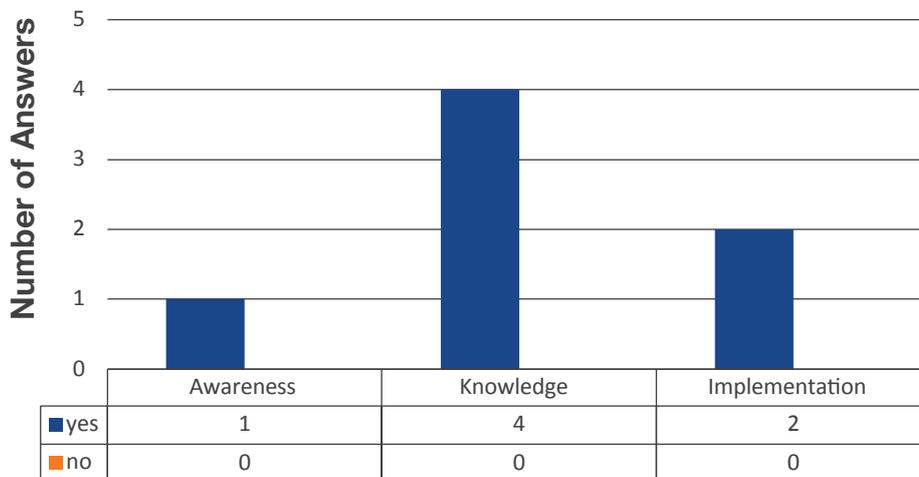
J. Low voltage (Dir. 2014/35/EU)

## LOW VOLTAGE



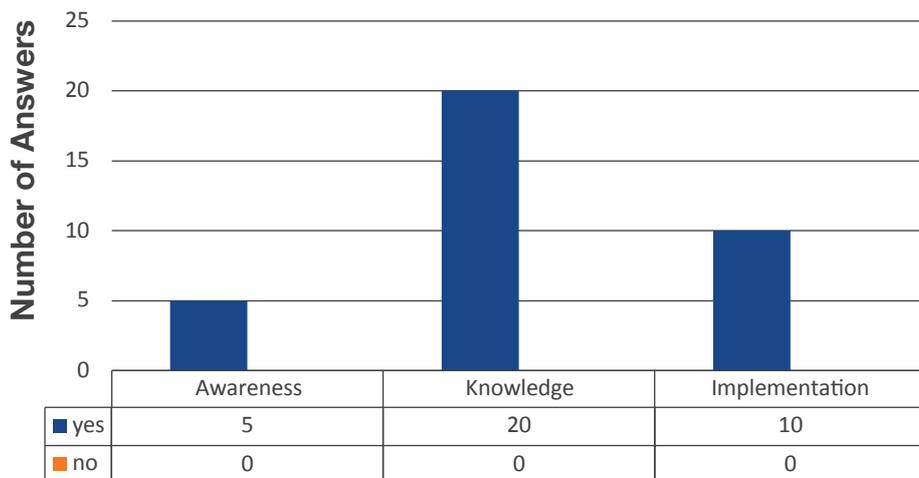
K. Radio equipment (Dir. 2014/53/EU)

### RADIO EQUIPMENT

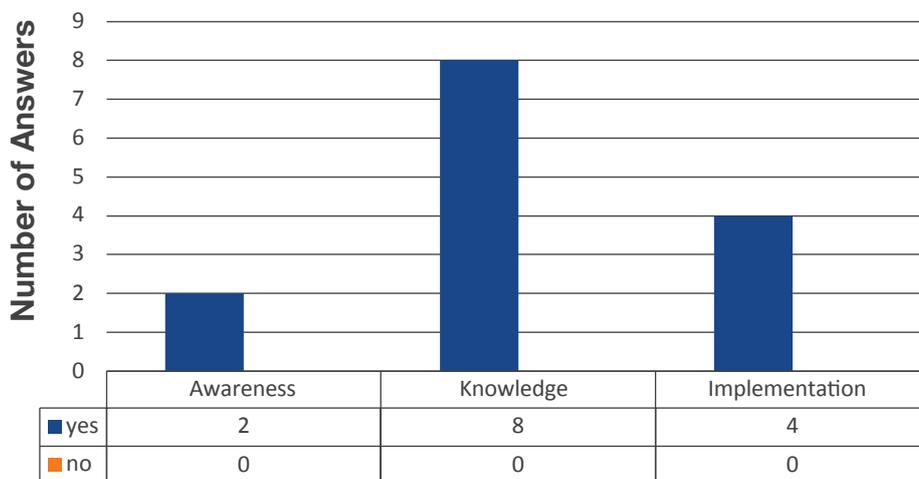


L. Medical devices (Reg. (EU) 2017/745)

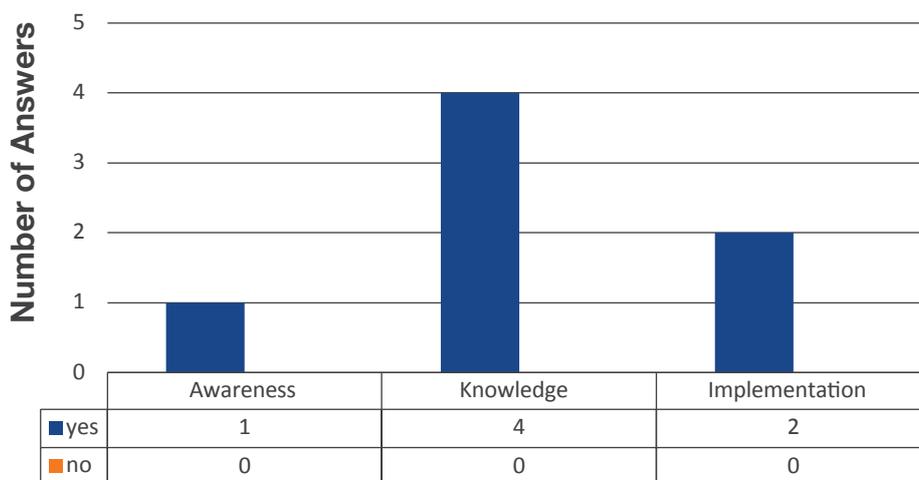
### MEDICAL DEVICES



## MEASURING INSTRUMENTS

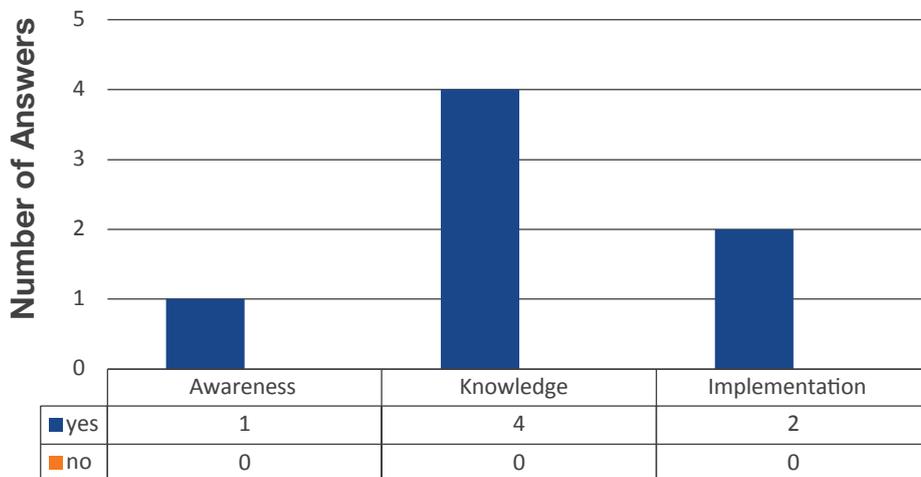


## NON-AUTOMATIC WEIGHING INSTRUMENTS



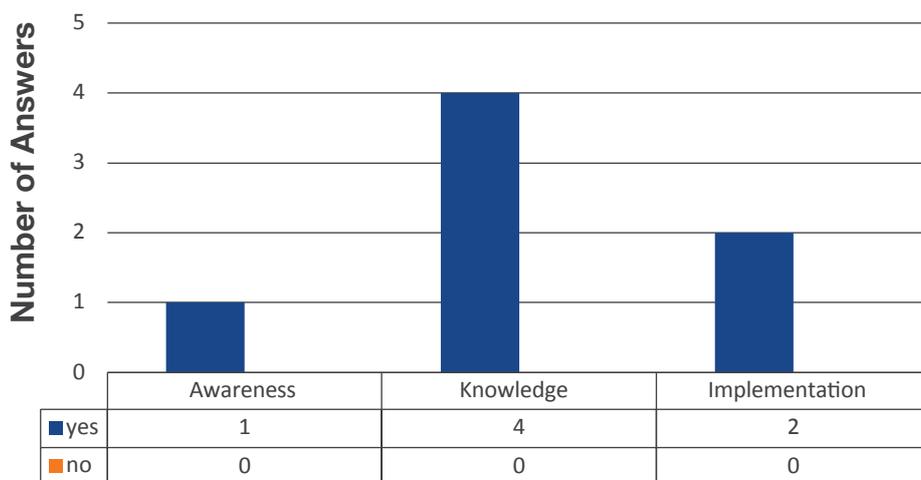
O. Equipment for explosive atmospheres (Dir. 2014/34/EU)

### ATEX



P. Explosives for civil use (Dir. 2008/68/EC)

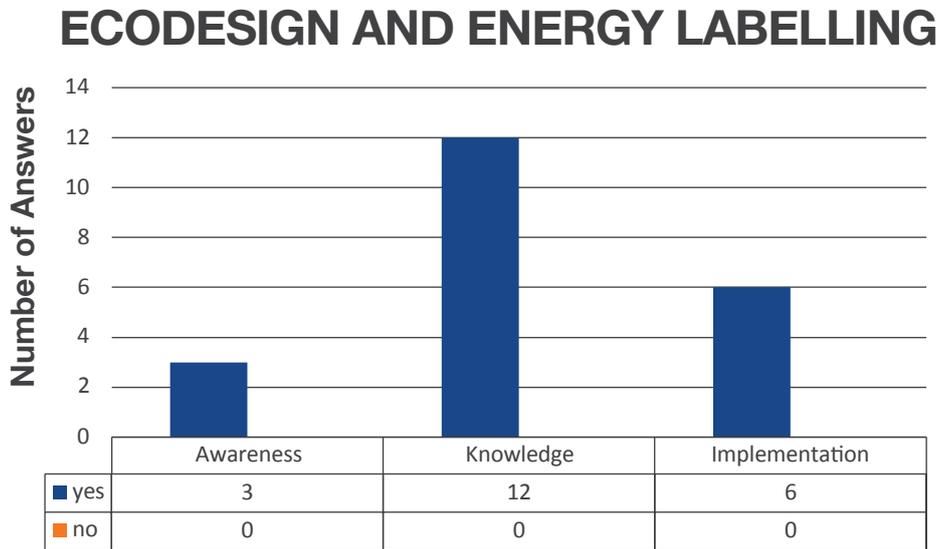
### EXPLOSIVES FOR CIVIL USE



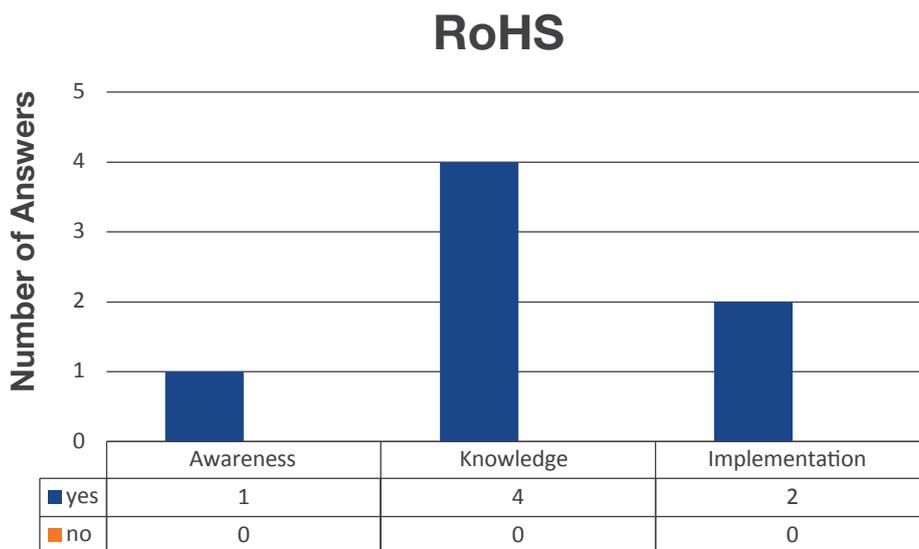
## 2.5. Additional and general legislation for electrical and electronic products

These directives are relevant to more of the audited companies, but only three companies filled the additional and general legislation for electrical and electronic products. These are fully compliant on all three pillars.

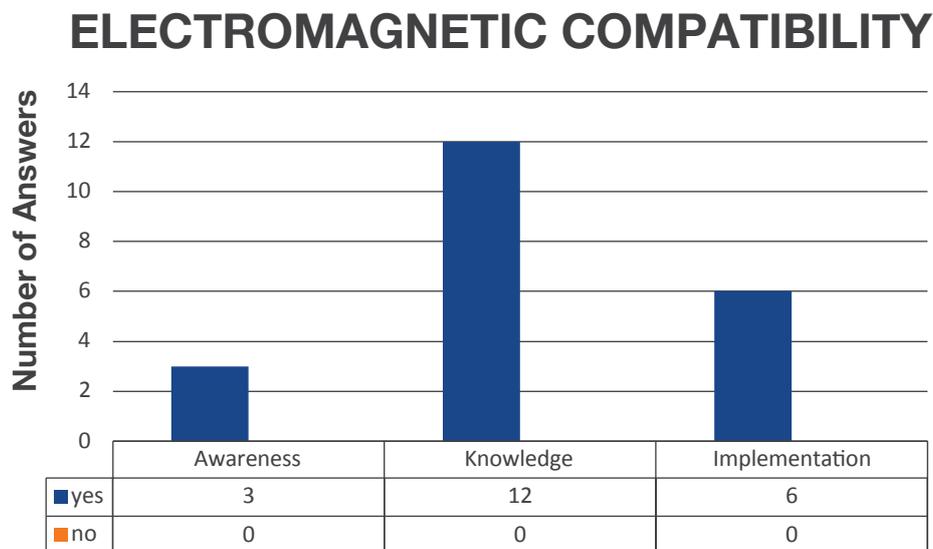
### 2.5.1. Eco-design and energy labelling (Dir. 2009/125/EC + Reg. (EU) 2017/1369)



### 2.5.2. Restriction of the use of certain hazardous substances (Dir. 2011/65/EU + Reg. (EU) 2017/2102)



### 2.5.3. Electromagnetic compatibility (Dir. 2014/30/EU)



## 2.6. Conclusions

The first part on general positioning and awareness shows that Turkish companies are aware of EU regulations and implementing them accordingly. Knowledge is still limited for SMEs, but this is not different in European companies, as external bodies are often the knowledge carriers of the CE marking process. As mentioned before, the alignment of Turkish national legislation with the EU legislation has clearly paid off in the journey to full compliance of industrial manufacturers.

Regarding the specific product groups, construction products and machinery seem to be the most common industries for trade with EU. In general the results are positive on all three pillars. The negative results for construction products are due to irrelevance of the interviewees. However the datasets for some product groups are too small to draw conclusions, it is obvious that in high tech industries such as medical devices, measuring equipment and electrical and electronic products, the regulations are well understood and implementation is completed.

Further action in raising awareness on eco-design and energy labelling for electrical and electronic products is required, especially considering the evolution towards a circular economy in Europe.

## 3. Subject: EU “Acquis Communautaire” in the field of Sustainable Products and Production

### 3.1. Introduction

Over 101 Turkish companies were interviewed on their knowledge and understanding of legislation pertaining to sustainable production and trade in the EU. The objective was to determine preparedness of Turkish SMEs for doing business with the EU from the aspect of recently evolving environmental legislation and increasing demands in this area.

With the emphasis on transition to a circular economy in the EU instigated within new waste legislation, adaptation of chemical and product legislation, to provide a clear, unambiguous, comprehensive and complementary legislative framework for sustainable development economic stakeholders, especially SMEs are in constant pressure to improve their knowledge to comply and even profit from new market demands and legislative challenges.

The assessments were performed by a trained group of professionals from different regional offices of the Turkish Chamber of Commerce and Industry.

Knowledge was transferred to experts through a short training course conducted in Ankara. The course presented the toolkit consisting of a checklist and summary on legislation covering the most important subjects within EU legislation related to sustainable production and trade in small and medium sized enterprises was prepared to assist them.

The checklist was divided into two main sections devoted to:

- **Sustainable products** relevant for manufactured products, their trade and provision of services related to these products, especially with relevance to export to the EU market and participation in green public procurement.
- **Sustainable production** relevant when interviewing manufacturing locations

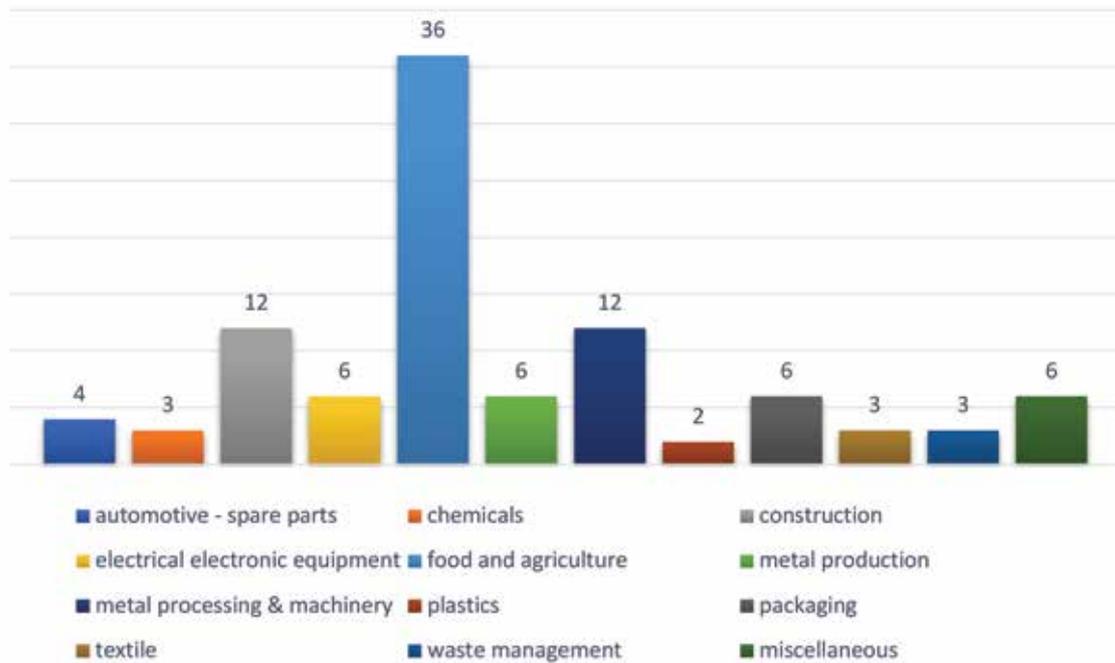
An accompanying overview in PowerPoint and Word format navigated the experts through the most relevant aspects of the checklist, providing additional short descriptions and links to consolidated legislative texts, where they exist, and other more comprehensive information provided on the EU websites.

Before visiting a production or manufacturing site, the experts were advised to pay special attention to the second section of the checklist devoted to activities requiring special authorisation in order to identify relevant issues and gain as much knowledge of the company to be visited, beforehand to adapt the emphasis of the questions.

### 3.2. Characteristics of companies participating in the audits

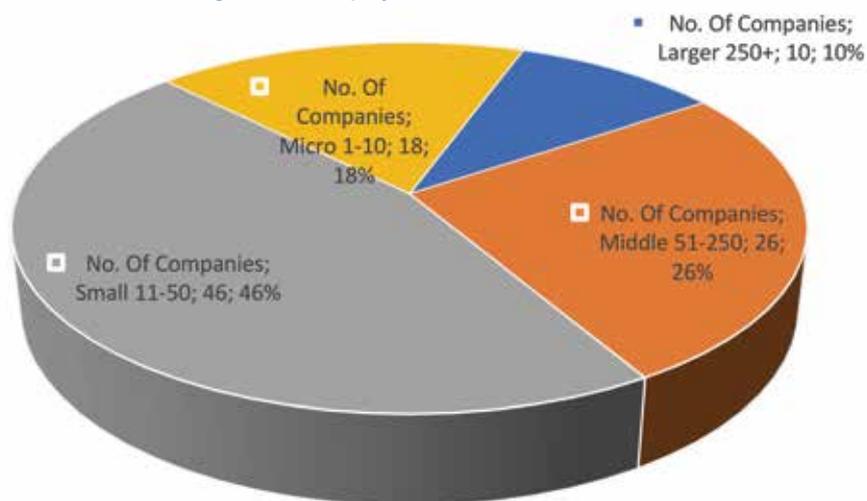
The following summary report was prepared based on the results from 101 questionnaires filled out by the trained experts in the visited companies.

Graph 1. Sectors and industries covered



The companies interviewed, originated from a wide spectre of sectors including several companies from the agriculture and foodstuffs sector, construction, metal production and processing, plastic production and recycling, electrical and electronic equipment and car spare parts to a few random and individual sectors designated as miscellaneous. The latter included individual companies producing flat glass, rubber, boats from glass fibre reinforced polymers, nappies, broom, shipbuilding and brooms.

Graph 2: Companies distributed according to no. of employees



### 3.3. Audit results

Due to the different sectors and activities, not all questions were relevant for each company. The answers from each individual checklist were scrutinised and evaluated according to the activities performed by the company, information available on their website, where existing and company size.

The answers for each company were then distributed into the following categories:

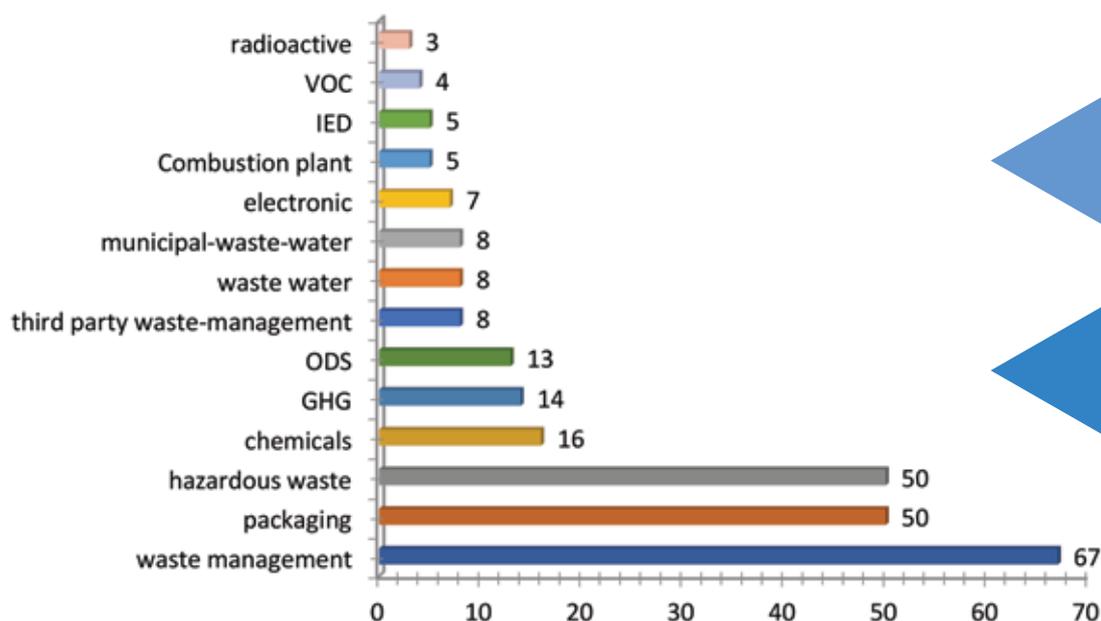
- Recognised and implemented legislative requirements
- Possible legislative gaps indicated by legislation not recognised or misinterpreted
- Number of companies preparing to or already implementing environmental or energy management systems
- Needed additional funding for investments to achieve complete legislative compliance with the acquis.

It must be emphasised that even at EU level, countries may implement the same requirements specified by directives in a different manner. It is also admissible that some of the conclusions from the checklists have been misinterpreted due to translation from English to Turkish and back. As the topics linked to sustainable production and trade are wide and varied it could be the case that the interviewee was not aware of all the aspects referred to in the questionnaire.

No comparison was made between the demands of individual directives and the current implementation of Turkish environmental legislation, as this would exceed the scope of the project.

The checklist results offer a general overview on the topic of sustainable production in trade. A detailed individual analysis, by experts would be required to ascertain a more accurate state of knowledge and understanding on the topic.

Graph 3: recognized relevant legislation companies are familiar with

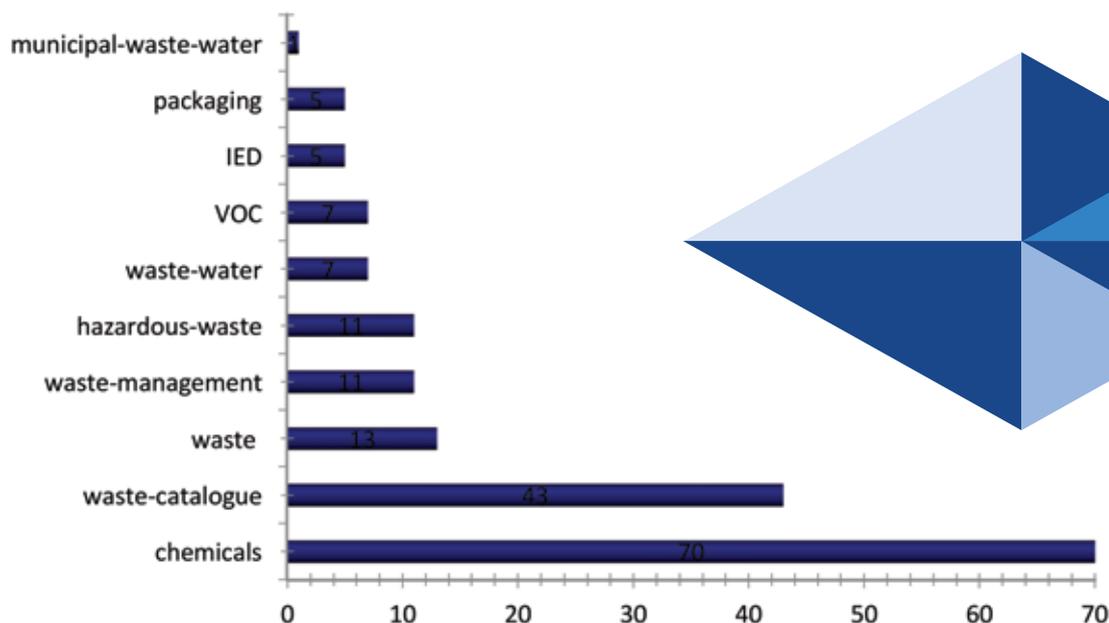


Roughly 50% of the companies interviewed noted knowledge and implementation of extended producer responsibility for packaging and waste packaging. Extended producer responsibility for electrical and electronic equipment, batteries and accumulators as well as end-of-life vehicles was also good and distributed according to relevance in individual sectors.

All companies dealing with vehicles and their components (spare parts) indicated awareness of eco-design and mandatory labelling.

A lot of the companies answered that they were acquainted with the directive concerning single use products and they were already implementing the rules regarding these products. According to the profile of the companies, this legislation, which has only recently been agreed at EU level and not yet adopted over the EU would probably be of importance for less than a handful of the interviewed companies. For most of the companies stating compliance and implementation it would therefore not even be relevant.

Graph 4: legislation possibly missed or unrecognized by no. of companies



No company indicated any knowledge or interest in voluntary environmental labelling (the ecolabel brand), or it was from a sector where voluntary environmental labelling (ecolabel) is not relevant, i.e. agriculture and food, where the reference could have been misunderstood and probably referred to organic food labels.

Over 70% of the companies did not recognize the relevance of handling chemicals, substances and mixtures, indicating a possible legislative gap in this area. This is a critical area, especially as the approaches from this area is being unified with waste management approaches.

Most companies, roughly 70 % were aware of the waste management rules and rules for hazardous waste and noted implementation, yet almost half of the companies questioned were not aware of the list of waste, i.e. waste catalogue, which could also indicate a legislative gap or a misinterpretation in this area. In April 2018, the commission published Commission notice on technical guidance on the classification of waste (2018/C 124/01), where the list of waste or waste catalogue plays a critical role for distinguishing between non-hazardous and hazardous waste, providing a uniform interpretation of waste designation and subsequent rule for waste management.

Only two companies reported they were handling devices containing radioactive sources, which seems in line with the profile of the participating companies.

Air ambient emissions were limited to fluorinated greenhouse gases (GHG) and substances that deplete the ozone layer (ODS). Some companies indicated that they handled both types of gases in appliances for cooling, air conditioning, fire protection etc. which could indicate a lack of knowledge to distinguish between the two, which is not uncommon also in some EU enterprises.

Some companies from similar activities and sectors reported urban and surface water discharges, while others did not. This could indicate, that some companies were not required to obtain authorization, while others were, or that companies operated with closed loop water systems, or that they employed a different process technology and did not encounter waste water discharges at all.

Some uncertainties exist regarding third party waste treatment which could not be discerned from the answers in the checklist. It could be that some construction companies are offering waste collection for their clients as a complimentary service, though it is not evident whether this service is performed according to the registration, authorization and/or permit requirements prescribed by EU waste legislation.

No organization reported services related to transboundary waste shipments, which seems in line with the profiles of the companies participating in the audit.

Some companies acknowledged that they are situated in environmentally sensitive areas and were aware this could imply longer and more stringent permitting procedures.

Larger companies with a 100 and more employees, active in metal processing and production, food production and chemicals were aware they may be subject to the industrial emissions directive, if Turkey would become a member of the EU.

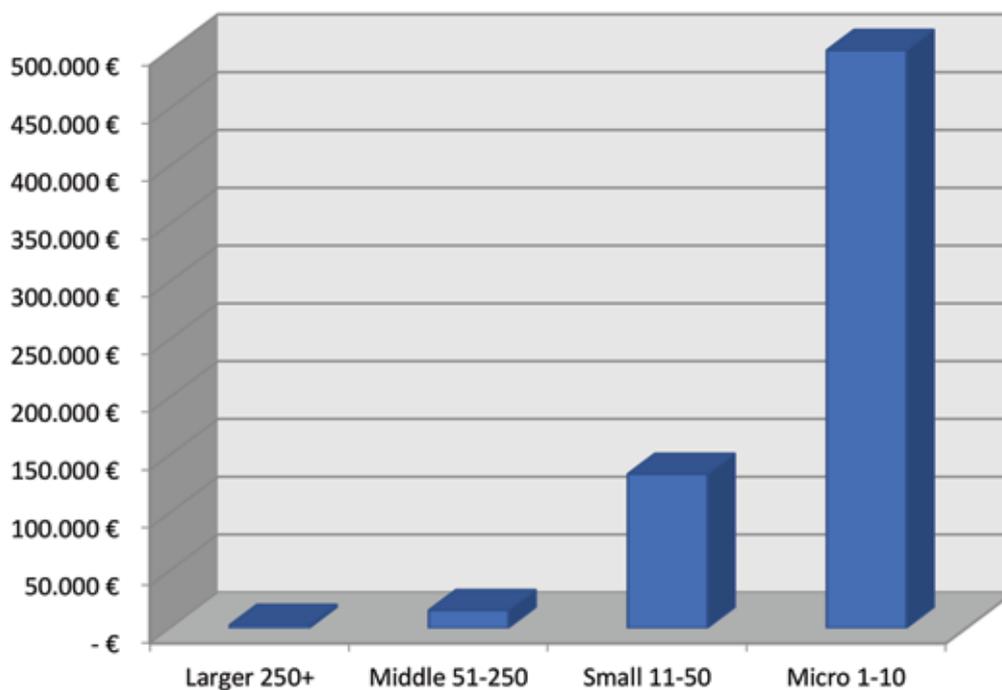
The number of companies adhering to legislation pertaining to volatile organic compounds is in line with expectations according to the profiles of the participating organizations.

It is difficult to ascertain how correct the answers were regarding the requirements of the Seveso

directive concerning prevention of major industrial accidents due to the storage or handling of dangerous substances. Some very small organizations recognized liability, which is probably not the case in relevance to their size and sector (construction). The same companies reported they did not handle chemicals, substances or mixtures.

A lot of companies indicated the need for additional funding in order to cover investments required for complete compliance with EU legislation. Estimations made by company representatives indicate that the most funding per employee would be needed in the smallest companies. Graph 5 displays that the highest need for investment per employee was identified in the smallest companies interviewed.

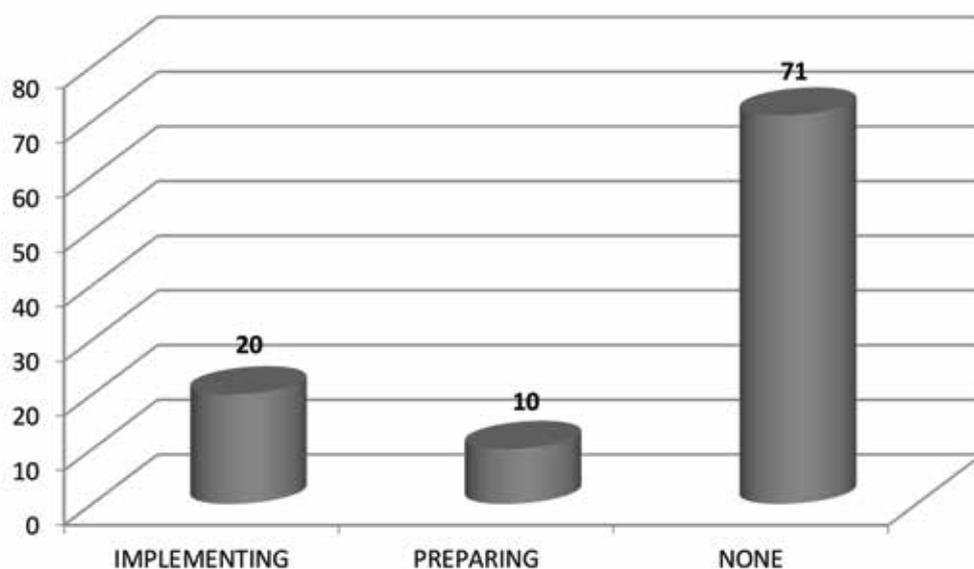
Graph 5: estimated investment required for compliance with EU environmental acquis



Some companies identified needs for investment, even though they were not aware of any of the listed legislative areas. This indicates that they feel they are not aware of requirements and are in need of additional information, training and exchange of good practice. The responses from some of the larger companies with an implemented

environmental management system indicate a good comprehension and knowledge of sustainable production and trade requirements. As such these companies could be asked to present their activities at Chamber events in order to transfer good practice and knowledge to smaller companies.

Graph 6: no. of environmental management system by no. of companies



The number of companies implementing an environmental or energy system was small. A lot of companies stated they were preparing to implement these systems. In one region, all the agricultural and food companies interviewed stated

they were implementing an environmental or energy management system though this is questionable as one of the companies consisted only of two employees.

### 3.4. Conclusions

Due to the different sectors and activities, not all questions were relevant for each company. The answers from each individual checklist were scrutinized and evaluated according to the activities performed by the company, information available on their website, where existing and company size.

Almost 70 % of the companies were aware of the waste management rules and rules for hazardous waste and noted implementation, but almost half of those interviewed were not aware of the list of waste, i.e. waste catalogue, which could indicate a legislative gap or a misinterpretation in this area

Most of the companies did not recognize the relevance of handling chemicals, substances and mixtures, indicating a possible legislative gap in this area.

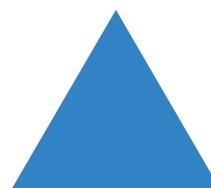
Some companies identified needs for investment, even though they were not aware of any of the listed

legislative areas. This indicates that they feel they are not sure of requirements and need additional information, training and exchange of good practice.

The highest need for investment per employee was identified in the smallest companies interviewed.

The responses from some of the larger companies with an implemented environmental management system indicate a good comprehension and knowledge of sustainable production and trade requirements. As such these companies could be asked to present their activities at Chamber events in order to transfer good practice and knowledge to smaller companies.

The number of companies implementing an environmental or energy system was small, while no interest was displayed in voluntary environmental labelling indicating the most companies currently do not see a benefit from these instruments.







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