






Centralized National Risk Assessment for Turkey

FSC-CNRA-TR V1-0 EN

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Risk assessments that have been finalized for Turkey

Controlled Wood categories		Risk assessment completed?
1	Illegally harvested wood	YES
2	Wood harvested in violation of traditional and human rights	YES
3	Wood from forests where high conservation values are threatened by management activities	YES
4	Wood from forests being converted to plantations or non-forest use	YES
5	Wood from forests in which genetically modified trees are planted	YES

Risk designations in finalized risk assessments for Turkey

Indicator	Risk designation (including functional scale when relevant)
Controlled wood category 1: Illegally harvested wood	
1.1	Low risk for state and public forest Specified risk for private forest
1.2	N/A
1.3	Low risk
1.4	Specified risk
1.5	Low risk for state forest N/A for private and public forest
1.6	Specified risk
1.7	Low risk for state and public forest Specified risk for private forest
1.8	Specified risk
1.9	Low risk for protected areas Specified risk for forests outside protected areas
1.10	Specified risk
1.11	Specified risk
1.12	Specified risk
1.13	Specified risk
1.14	N/A
1.15	N/A
1.16	Low risk
1.17	Specified risk
1.18	Low risk
1.19	Low risk
1.20	Low risk
1.21	N/A
Controlled wood category 2: Wood harvested in violation of traditional and human rights	
2.1	Low risk
2.2	Specified risk for rights to freedom of association and to collective bargaining and on gender wage discrimination Low risk on child labour, forced labour and other forms of discrimination
2.3	Specified risk
Controlled wood category 3: Wood from forests where high conservation values are threatened by management activities	
3.0	Low risk
3.1	Low risk for plantation Specified risk for natural forest
3.2	Low risk for plantation Specified risk for natural forest
3.3	Low risk for plantation

	Specified risk for natural forest
3.4	Low risk for protected forest Specified risk for production forest (natural forest and plantation)
3.5	Low risk for plantation Specified risk for natural forest
3.6	Low risk
Controlled wood category 4: Wood from forests being converted to plantations or non-forest use	
4.1	Low risk
Controlled wood category 5: Wood from forests in which genetically modified trees are planted	
5.1	Low risk

Risk assessments

Controlled wood category 1: Illegally harvested wood

Overview

In Turkey, the forest area covers about 28.6 % of the land, which equals to 22.342.935 ha of the total land base (78.004.644 million ha.). Of the total forest area, 56.9% (12.704.148 million ha) are productive forests and 43.15% (9.64 million ha) of the total forest area are less productive, degraded forests. 87.8 % of the forest area in Turkey (both productive and degraded) are high forest (forest mainly established by seed naturally or by human interference), whereas 12.2 % are coppice forests (2.723.217 ha.) (MofForest&Water, 2015¹). As of 2013, about 5.373.162 ha have been declared as protected areas of which 1.688.392 ha is forest (GDNP, 2016). Plantation forest accounts for 2.338.073 ha (CEM, 2015), which account for 10,4% of the total forest area. Forest cover has been increasing, at an annual rate of 0.8% between 1990 and 2015 (FAO, 2015).

The wood volume of all of the forest area is 1.6 billion cubic meters and the annual increment of volume is 45.9 million cubic meters. In 2015 the total timber production is 21.635.000 m³, of which 5.000.000 is for fuel-wood (GDF (N.Y)). The General Directorate of Forestry (GDF) controls and supervises all forest land (state, public and private). Farm land plantation forest are not considered as forests by law and are outside the control of GDF. There are about 200.000 ha of farmland plantation forest (see Timber Source Types) that are owned by private individuals and managed as farmland without forest management plans. Only the research project development and consultancy services for forest extension are exceptions where the GDF do supervise farm land plantation forests.

The majority of forest areas are under state ownership, which is the case for more than 99 % of all forest area in Turkey. The remaining part is under private and public ownership. Accounting for 0.1-0.5% of the forest land (farm land not included). Most public and private forests are in Marmara and the Aegean region (Gunes and Coşkun, 2008). State forests are managed by the General Directorate of Forestry on behalf of the State (Turkish Republic). Public forests are managed by the owners, who are the public legal entities (such as municipalities, public universities, etc.). Private forests are managed by the owners, who are private individuals or legal entities. By law all forest owners are obliged to prepare and implement forest management plans in connection with harvesting, protection and amelioration of their forests. However, public forests and private forests are usually not managed for commercial timber harvesting purposes, as the areas are small and degraded. Thus, private forests are more commonly used for enjoyment/aesthetic values/recreational purposes (personal communication 17).

As for the institutional structure, the Ministry of Forestry and Water Affairs has been established under the central Administration. Under the Ministry the General Directorate of Forestry has been authorized to manage, administer and supervise all state forests in the Country. The General Directorate of Forestry has central departments, regional and local branches. The central department has 13 different divisions, which cover areas such as forest planning,

¹ <https://www.ogm.gov.tr/ekutuphane/Yayinlar/T%c3%bcrckiye%20Orman%20Varl%4%b1%c4%9f%c4%b1-2016-2017.pdf>

silviculture, forest protection, afforestation, forest nursery etc. At the regional scale 28 regional directorates implement forest management plans, national forestry programs and national forest policy in state forests. In addition, 12 forest research stations have been scattered throughout the country to conduct research about forestry.

The main policy approach for forestry as mentioned in the National Forestry Programme 2014-2023 are protection, exploitation and increase of forest areas in a sustainable manner. The majority of forest areas have been opened for planned harvesting. However, some pristine, high conservation value areas have been reserved for protected areas, such as national parks, nature parks, nature protection areas, national monument, seed orchards, protection forests, wildlife protection and game reserve areas.

Three levels of legislation (constitutional, statutory and regulatory) are applicable. At the constitutional level, article 169 of the Turkish Constitution of 1982 is applicable in all forestry issues. At the statutory level, there are several laws of which the Forest Code of 1956, No: 6831 is essential for forest management, planning, and harvesting. At the regulatory level, there are around 100 regulations dealing with forestry issues, practices and management. Out of which the Forest Planning Regulation, the Forest Afforestation Regulation and the Forest Exploitation Regulation are prominent regulations on this level.

The population in Turkey is about 80 million, from which, about 75 % live in urban areas and the remaining 25 % live in rural areas. Of the 20 million Turkish people living in rural areas, about 7.1 million live in approximately 17.000 forest villages (GDF, N.Y). The main source of income for those people come from the jobs created within forest harvesting, silvicultural practices, afforestation and collection of non-wood forest products etc. Those people constitute an essential source of forest labour in harvesting, transportation, afforestation and protection (de Haan, 1998).

In 2016 Turkey had a Corruption Perception Index of 41 (below the threshold of 50) and according to the World Bank Worldwide Governance Indicators, - on a scale of -2,5 to 2,5 – in 2014 Turkey received a score of 0.38 for Governance Effectiveness, 0.04 on Rule of Law and -0.12 for Control of Corruption, indicating the country having some issues with the corruption level and legal compliance.

Experts were consulted throughout the risk assessment. The names and position of the experts are known to FSC, but are not publicly disclosed.

The list of sources provided in FSC-PRO-60-002a, section 3.3.3 has been reviewed for relevance in regards to the national legality risk assessment of Turkey. The following sources have been used:

- a) Chatham House: <http://www.illegal-logging.info/>;
- d) EU FLEGT process: http://ec.europa.eu/comm/development/body/theme/forest/initiative/index_en.htm;
- f) Government reports and assessments of compliance with related laws and regulations;
- g) Independent reports and assessments of compliance with related laws and regulations
- h) Interpol: <http://www.interpol.int/Crime-areas/Environmental-crime/Projects/Project-LEAF>;
- l) Stakeholder and expert consultation outcomes from NRA development processes;
- n) Transparency International Corruption Perceptions Index: http://www.transparency.org/policy_research/surveys_indices/cpi;
- o) World Bank Worldwide Governance Indicators: <http://data.worldbank.org/datacatalog/worldwide-governance-indicators>;
- p) In cases where other sources of information are not available, consultations with experts within the area were conducted.

Where relevant, they have been specifically referenced under “sources of Information” for each applicable sub-category.

Sources of information

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- Gunes and Coşkun (2008): Trends in forest ownership, forest resources tenure and institutional arrangements: are they contributing to better forest management and poverty reduction? A case study from Turkey. Available at: <http://www.fao.org/forestry/16407-0c0665eddd86a68c9fbbc87cdde52501c.pdf>
- MoF (2013), Tabiatı Korumada Son 10 Yıl, Teknik Bülten (Last 10 Years at Tabiatı Korumada, Technical Bulletin) issue:3, Forest&Water (MoF) Ankara, Available at: <http://www.milliparklar.gov.tr/dergi/3/?sflang=tr#/4>
- Yildirim H. (2011) Industrial wood production and consumption in Turkey and some future projections. Available at: http://www.academicjournals.org/article/article1380726067_Yildirim.pdf

Legislation

- Forest Code of 1956, No. 6831,
- Law of Establishing General Directorate of Forestry of 1985, No: 3234, article 2/paragraph. Available at: [ğ-www.mevzuat.gov.tr](http://www.mevzuat.gov.tr)
- Law of National Parks of 1983, No: 2873,
- Turkish Constitution of 1982, article 169,

Sources of legal timber in Turkey

Forest classification type	Permit/license type	Main license requirements (forest management plan, harvest plan or similar?)	Clarification
Natural Production Forests	Harvesting Contract (Registered companies) Harvesting permit (privates, Coops)	Forest Management plans, which conforms to the national forest policy and program	Signed between contractor and General Directorate of Forestry, standing trees are purchased and and cut them on behalf of themselves
Plantation Production forest	Harvesting Permit	Forest Management plans	
Degraded forest	Harvesting Permit	Management plan have recovery function, not typical production function.	Limited source of timber. Managed for recovering purposes, Firewood production takes place.
Natural/Plantation Protection forest	Harvesting Permit	Forest Management plan	Limited source of timber. Only allowed for forest managing purpose
Natural Protected forest	Harvesting Permit	Forest Management plan	Limited source of timber. Only allowed for forest managing purpose
Private farm land forest	No harvesting permit/contract required	Not required.	In Private farm land plantations forest the seedlings of poplar tree (I-214 Clone of Populus Canadiensis)) are planted on farm lands for about 15 year- time period. Following, the site may be converted to crop production. The purpose of such a farm land plantation is the source of commercial timber.

Risk assessment

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
Legal rights to harvest			
1.1 Land tenure and management rights	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Turkish Constitution of 1982, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.2709.pdf Law on Land Cadastre of 1987, No: 3402 Forest Code of 1956, No: 6831, articles 26, 31, 32, 33, 34, 37, 39, 40, 41, 42, 43. http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf Law on Corporate Tax of 2006, No:5520. http://www.gib.gov.tr/node/90937 <p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Forestry (GDF) of Ministry of Forestry and Water Affairs <p>GDF is authorized and responsible for all forestry</p>	<p>Government sources</p> <ul style="list-style-type: none"> Annual Report of General Directorate of Forestry, 2015, www.ogm.gov.tr, http://www.ogm.gov.tr/ekutuphane/FaaliyetRaporu/Orman%20Genel%20M%C3%BCd%C3%BCr%C3%BCn%C4%9F%C3%BC%202015%20Y%C4%B1%C4%B1%20Faaliyet%20Raporu.pdf Personal communication 3, Director of Istanbul Regional Forestry District <p>Non-Government sources</p> <ul style="list-style-type: none"> FAO Country Report 2015, http://www.fao.org/3/a-az358e.pdf, http://www.illegal-logging.info/regions/turkey Gunes, Y. & Coşkun, A.A. (2008). Trends in Forest Ownership, Forest Resources Tenure and Institutional Arrangements Are They Contributing to Better Forest Management and Poverty Reduction? 2008, A Case Study From Turkey: http://www.fao.org/forestry/16407-0c0665eddd86a68c9fbbc87cdde52501c.pdf Gunes, Y. & Elvan, O.D. (2005) Illegal Logging Activities in Turkey Environmental Management 36: 220. http://link.springer.com/article/10.1007/s00267-003-0107-1 TKGM, 2017: Tapu Kadastro Genel Müdürlüğü (General Directorate of Land Surveying and Land Registry). Available at: 	<p>Overview of Legal Requirements</p> <p>In Turkey, forests can be owned by the state, public entities other than the state, and private entities. The majority of the forest in Turkey (approximately 99%) is owned by the state, (GDF Annual Report 2015). The Constitution prohibits the sale of the state forest.</p> <p>Article 169 of the Turkish Constitution of 1982 delegates all management rights of State forests to the Turkish State. The General Directorate of Forestry is authorized by the Forest Code to manage, administer, protect and exploit all State forests. It also has the right and obligation to supervise and protect all public and privately owned forests, and thus, privately owned forests are under the control and supervision of the state under GDF as well.</p> <p>Farm land plantation forests are considered to be on agricultural land, and are not covered by the Forest Code and are not under the authority of GDF. The land can be converted back to agriculture.</p> <p>The state can reclaim former farm land where natural forest regrowth has occurred. Conversion of state land is only allowed on degraded land where natural regeneration cannot take place. The state considers that if natural regeneration can occur this can indicate a former illegal conversion of forest to agriculture, and the land is therefore State land. Once covered by natural forest, this area is not allowed to be converted back to farm land. This issue is particularly relevant for private land, including farmland, bordering state forest.</p> <p>As the GDF is a State institution and not a corporation, it is not required to pay tax and shall not be registered for tax. However, local forestry enterprises are obliged to pay income tax and shall be registered for tax. According to article 1 of the Law on Corporate Tax of 2006, No:5520, corporations shall pay corporate tax and shall be registered as a company.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>relevant issues, except for farm forests. For farm forests the owners are authorized and responsible for all forestry issues, conveying management rights etc.</p> <p>Legally required documents or records</p> <ul style="list-style-type: none"> • Certificate of land registry (title deed) – for farm forests (Can be obtained on-line from website) <p>https://www.tkgm.gov.tr/en; https://www.tkgm.gov.tr/tr</p>	<p>https://www.tkgm.gov.tr/sites/default/files/icerik_ekleri/kadastro_islemleri_rehberi.pdf</p> <ul style="list-style-type: none"> • Personal Communication 17 – Professor, Istanbul University, Faculty of Forestry. Department of Forestry and Environmental Law 	<p>According to the Law on Land Cadastre of 1987, No: 3402, privately owned forests are registered in the land registry and are issued a land title. Degraded forest can be sold to private entities, or the forest land can be inherited. Private land titles are not available in a public register, but are held by the owner. Similar to private forests, all public forests must also be recorded in land registry and the public legal entities should have their own land title on those forests to prove their rights. The State forests are not required to be recorded in the land registry, but their outer boundaries are delineated for clarification purposes. It is the discretion of the GDF whether the state forests shall be registered in the land registry or not. Some of the forest areas have been recorded and have a land title on them and some have not. Land titles on state land are used if the Directorate transfers land rights to an investor, such as tourism investment in a particular piece of state forest, those clearly delineated forest land is to be recorded in the land registry as an independent parcel. These areas will not be sold but rented out for other land use purposes for a limited amount of time. The process of renting out forest land will differ depending on the intended use (mining, tourism, etc.). However, land fee shall be paid yearly and an environmental impact assessment shall be conducted for such projects. The areas shall have been included in the spatial planning and be declared to be allocated to an investor.</p> <p>Description of risk Land survey started a century ago, and maps are not fully in line with the actual conditions on the ground, as the specification of boundaries can be incorrect (personal communication 3). This situation can lead to conflicts between forest area boundaries. This is a common issue for private forest land bordering State or public forest land due to the land survey process not having been finalized (TKGM, 2017). State and public land is both under the state treasury, and there are no conflicts between state and public land (Personal communication 17).</p> <p>Land survey in north-eastern Turkey has started only in 2005 and local people living in the forests do not hold a land title. As by law, State land</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>forests cannot be granted to local people, and they have no legal claim to forest land. There are conflicts between local people and the state, but legally the state holds the title.</p> <p>The GDF and land registry have separate mapping systems. The Land registry will receive input surveys which do not automatically exclude forested areas. This area can then be issued for a land title to a private person. Thus, in case of conflict, land titles cannot be fully relied on for proving land rights if titles are overlapping with natural forest, as this legally shall be owned by the state.</p> <p>If brought to court the court will often judge in favour of the GDF. Thus, if material is sourced from privately owned forest, the GDF needs to be consulted to verify that there are no land conflicts.</p> <p>Companies are registered for tax and business as required. Companies are to be registered in the commercial registry (electronic registry), publicly available online for each province.</p> <p>Risk conclusion This indicator has been evaluated as specified risk for private forests. Ownership conflict when private natural and degraded forest area is bordering state forest. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p> <p>This indicator has been evaluated as low risk for state forests and public forests. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities/or by the relevant entities.</p>
1.2 Concessi on licenses	Applicable laws and regulations	N/A	N/A

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Not applicable – there is no legislation in place covering concessions in Turkey.</p> <p>Legal Authority</p> <p>N/A</p> <p>Legally required documents or records</p> <p>N/A</p>		
1.3 Management and harvesting planning	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Turkish Constitution of 1982, Article 169, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.2709.pdf Forest Code of 1956, article 26., http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf Forest Management Regulation of 2008 (Orman Amenejmanı Yönetmeliği), http://www.mevzuat.gov.tr/Meti 	<p>Government sources</p> <ul style="list-style-type: none"> ogm.gov.tr (N.Y). Directorate of Forestry Administration and Planning - Terms of Service. Available at: http://www.ogm.gov.tr/Baskanliklar/OrmanIdaresivePlanlama/Sayfalar/GorevTanimlari.aspx GDF Seminar Notes, Orman İdaresi ve Planlama Dairesi Başkanlığı (2012) Hizmet İçi Eğitim Ders Notlari, Ankara Available at: http://ormuh.org.tr/arsiv/files/Orman%20Idaresi%20ve%20Planlama.pdf GDF, 2013. Yearly Work Program for 2013. Department of Forest Management and Planning. (in Turkish). GDF, 2018. General Directorate of Forestry Administration Activity Report for 	<p>Overview of Legal Requirements</p> <p>By law, all forests, other than farm land plantation forests, must be managed with forest management plans. All owners must ensure that forest management plans are prepared for a 10-year period (for forest species such as <i>Pinus brutia</i> and plantations forests) and for a 20-year period (for forest species such as <i>Pinus nigra</i>, oak trees etc.) are updated every 10 years and 20 years respectively. All forest management plans shall be approved by the GDF. According to article 13 of the Forest Management Regulation of 2008, forest inventory should be made and all data on size, biodiversity, trees and their volumes, non-wood forest products, functions, socio economic capacity and the health conditions of forests shall be collected and put into management plans. The management plan is produced at the forest district level, and containing detailed information down to forest unit level, where planning also occurs (personal communication 5). Private forest owners pay GDF or a forest engineer for the development of management plan.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>n.Aspx?MevzuatKod=7.5.11952&MevzuatIliski=0&sourceXmlSearch=orman</p> <p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Forestry (GDF) - Orman Genel Müdürlüğü, www.ogm.gov.tr <p>Legally required documents or records</p> <ul style="list-style-type: none"> Forest Management Plans for each Forestry District. 	<p>2017. February 2018. Presidency Of Strategy Development Ankara / 2018 (in Turkish)</p> <ul style="list-style-type: none"> Personal Communication 3 – Director, Istanbul Regional Forestry District Personal Communication 7 – Forest Engineer, GDF <p>Non-government sources</p> <ul style="list-style-type: none"> Personal Communication 5 – Expert Forester, Free Contractor Personal communication 17 – Professor, Istanbul University, Faculty of Forestry. Department of Forestry and Environmental Law 	<p>The management plan contains all data on inventory, annual allowable cut and relevant forest functions on each planning unit level, harvesting maps and annual activity steps for forest management.</p> <p>Description of risk Management plans are generally in place in both publicly and privately owned forests (personal communication 3),</p> <p>To prepare forest management plans, the GDF either prepare the plans using its own personnel/forest planning experts, or contract an independent contractor to prepare the forest management plans. The GDF will control and approve these plans to check if they comply with the required planning standards listed in the forest management regulation (personal communication 7).</p> <p>While plans are in place for a period of ten years (for forest species such as <i>Pinus brutia</i> and plantations forests) or twenty years (for forest species such as <i>Pinus nigra</i>, oak trees etc.), It is possible for management plans to not be renewed at the end of their period of validity, and several years may pass until they are. However, during the interim period, forests are managed according to ‘advance plans’ (meaning they are forest plans made in advance, to be used until the real forest plans are prepared) (Personal communication 17). The GDF’s yearly report for 2013 showed that more than half of the forests were not covered by proper management plans (GDF 2013). However, the 2017 report showed that management plans had been prepared for 11,9 million ha in the period between 2013-2017 (GDF 2018, table 48). Total forest area in Turkey is about 22,3 million ha, and the statistics shows that there has been a great emphasis on updating the management plans the last 5 years.</p> <p>Risk conclusion This indicator has been evaluated as low risk. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			efficiently followed up via preventive actions taken by the authorities/or by the relevant entities.
1.4 Harvesting permits	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Forest Code of 1956, No: 6831, articles 26, 31, 32, 33, 34, 37, 39, 40, 41, 42, 43. http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf Forest Management Regulation of 2008 (Orman Amenejmanı Yönetmeliği), http://www.mevzuat.gov.tr/Metin.Aspx?MevzuatKod=7.5.11952&MevzuatIliski=0&sourceXmlSearch=orman Regulation on the Means and Methods of Selling Forest Products (Orman Ürünlerinin Satış Usul ve Esasları Hakkında Yönetmelik) enacted based on Forest Code of 6831, Published in Official Gazette 20/3/2015 No: 29301. http://www.mevzuat.gov.tr/Yonetmelikler.aspx Order of GDF, No. 6877/A, Standing Tree Selling 	<p>Government sources</p> <ul style="list-style-type: none"> GDF, 1996, Orman Ürünlerinden Faydalanmak İsteyenlere Verilecek İzinlere Ait Tebliğ (Notice/ordinance on issuing license to the people who get benefits from forest products), Ankara. Available at: https://www.ogm.gov.tr/ekutuphane/Tebliğler/Orman%20Ürünlerinden%20Faydalanmak%20İsteyenlere%20Verilecek%20İzinlere%20Ait%20Tebliğ.pdf GDF, 2013, Orman İşletmeciliğinde Üretim Pazarlama Faaliyetleri (Marketing Activities in Forest and Production and Management), Ankara. Available at: http://www.ogm.gov.tr/ekutuphane/Egitim/İŞLE TME PAZARLAMA EĞİTİM.doc Personal Communication 3 – Director, Istanbul Regional Forestry District Personal Communication 10 – Forest Engineer, Istanbul Regional Directorate of Forestry Personal Communication 12 – Chief Forester, Istanbul Regional Directorate of Forestry <p>Non-Government sources</p> <ul style="list-style-type: none"> Transparency International (2017): Transparency International's Corruption Perceptions Index 2016: https://www.transparency.org/news/feature/corruption_perceptions_index_2016 	<p>Overview of Legal Requirements</p> <p>The GDF is the sole manager of the harvesting practices in state forest on behalf of the Turkish State. It either hires a contractor, or forest villagers or a forest village cooperative to harvest, or they put units of standing trees up for auction.</p> <p>Harvesting contract (State forest): For the harvest of standing trees, a harvesting contract shall be signed by a legally registered company. Once the contract is signed, the area is left in the hands of the contractor to cut.</p> <p>Harvesting permit (State forest): applicable for private or cooperative harvesting in state forests.</p> <p>Harvesting permit (private/public forest) For public and private forest, a harvesting permit is required (articles 40, 41 of the Forest Code, No:6831). The harvesting permit is issued by the local Chief Forester (regional forestry chief) and signed and sealed by the Director of Local Forestry and the Regional Director of GDF (Personal Communication 17).</p> <p>Both the harvesting permit and harvesting contract contains the parties' (forest enterprise and contractor/forest villagers, cooperatives), geographical location, tree species, volumes of logs, number of logs, time period of contract, harvest conditions, measurement and classification and recording of logs into registry, rights and responsibilities of the parties etc. (Order no: 288, rules of harvesting of timber).</p> <p>The volume of the timber sold as standing trees on auctions under harvesting contracts is calculated both before and after the trees have been harvested. If the actual volume exceeds what was predicted by 10%, the price paid will be recalculated and an additional fee shall be paid to GDF.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Guideline (Dikili Ağaç Satış Esasları) https://www.ogm.gov.tr/ekutuphane/Tamimler/6877A%20say%C4%B1%C4%B1%20Dikili%20Sat%C4%B1%C5%9F%20Tamimi%20EK-1%20%C4%B0%C5%9Flenmi%C5%9F%201.pdf</p> <ul style="list-style-type: none"> Order of GDF no: 288, rules of harvesting of timber, https://www.ogm.gov.tr/ekutuphane/Tebliğler/Forms/AllItems.aspx Commercial Law of 2011, No: 6102 (article 43), http://www.mevzuat.gov.tr/MevzuatMetin/1.5.6102.pdf Law on Cooperatives of 1969, No: 1163, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.1163.pdf <p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Forestry (GDF) - Orman Genel Müdürlüğü 	<ul style="list-style-type: none"> World Bank (2016): Worldwide Governance Indicators 2014: http://info.worldbank.org/governance/wgi/index.aspx#reports Personal communication 8 – farm forest owner, private farmland plantation enterprise Personal communication 9 - forest villager from a development cooperative Personal communication 17 - Professor, Istanbul University. Faculty of Law. Department of Forestry and Environmental Law 	<p>The parcels that will be actioned are announced publicly and the auctions themselves are public. Only those who register using a registration form, and provide documentation demonstrating that they are a competent forester can participate. Once the documentation is approved, a letter will be sent to the applicant stating the place, date and time of the auction. The auctions are monitored and inspected by an auction board and an inspector authorized by the Regional Director of Forestry (Order no: 288, rules of harvesting of timber).</p> <p>Description of risk Although the harvesting contract does contain information about the trees to be cut, there is a risk that a buyer of the standing trees cuts trees that are not included in the contract, and sells the timber as legal under the obtained contract. Selling the timber as standing trees makes it difficult to monitor whether the agreed trees are being cut or not (personal communication 9 and 12).</p> <p>In 2016 Turkey had a CPI of 41 (below the threshold of 50) and according to the World Bank Worldwide Governance Indicators, - on a scale of -2,5 to 2,5– in 2014 Turkey received a score of 0.38 for Governance Effectiveness, 0.04 on Rule of Law and -0.12 for Control of Corruption, indicating the country having some issues with the corruption level and legal compliance.</p> <p>Since all paper work is to be completed before the auction and the auction is transparent and public, the risk of corruption in relation to issuing of harvesting permits is not considered to be a widespread issue (Personal communication 17),</p> <p>The risk of misuse of a contract or permit is not considered to be systematic or widespread. Harvesting without a permit or contract mostly happens in the case of firewood collection (personal communication 3, 9 and 12).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legally required documents or records</p> <ul style="list-style-type: none"> State Forest: Harvesting contract with either forest villagers, forest village cooperatives or private contractors. Applicable for both; <ul style="list-style-type: none"> - Sales of standing trees - Contracting of harvesting on behalf of GDF Private/Public forest: Harvesting permit for silvicultural pruning from GDF (Chief forester) 		<p>Because the forests villagers live inside the forests it is quite easy for them to fell the trees without a legal permit and thus risk violating the harvesting regulation. They may sell the timber in the nearby market changing the status of the wood from being for household purposes to commercial timber. Also, people other than forests villagers may enter the forests without harvesting permits and fell the trees. To control such illegal activities can be difficult, because of the distance to the local forest offices (personal communication 10). However, they face the risk of both a monetary fine and imprisonments (Article 14, 91 of the Forest Code). The registered number of cases of illegal tree felling in 2015 were 2944, accounting for a volume of illegally harvested timber of 18.326 m3. (Annual Report of GDF, 2015, pp. 39.), but there is a risk that further violations go uncaught and/or reported.</p> <p>Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
Taxes and fees			
1.5 Payment of royalties and harvesting fees	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Forest Code of 1956, article 40, 41. http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf Order of GDF, No. 6877/A, Standing Tree Selling Guideline (Dikili Ağaç Satış Esasları) http://www.ogm.gov.tr/ekutuphane 	<p>Government sources</p> <ul style="list-style-type: none"> GDF, 2015, Dikili Ağaç Satış Esasları (Order of GDF, No. 6877/A, Standing Tree Selling Guideline). Available at: https://www.ogm.gov.tr/ekutuphane/Tamimler/6877A%20say%C4%B1%C4%B1%20Dikili%20Sat%C4%B1%C5%9F%20Tamimi%20EK-1%20%C4%B0%C5%9Flenmi%C5%9F%201.pdf. Personal communication 3 – Director, Istanbul Regional Forestry District 	<p>Overview of Legal Requirements For all state forest (both natural forest and plantation forest), when the GDF either sells standing timber or harvested timber, the sales price includes a harvesting fee (afforestation fee) that is to be paid to the State Treasury (Order of GDF no: 288). The afforestation fee is calculated on the basis of the annual unit price of afforested areas (in hectares), including the cost of seedling fee, labour cost, maintenance cost etc. It is to be paid when an invoice is issued to a contractor/buyer.</p> <p>When the buyer/contractor buys standing trees through auction, the site is left to him for the felling. The tree species and the volume of trees have been specified by a Chief Forester (local forestry officials). The harvesting fee is calculated on the basis of tree species, quality and volume. In the</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>ane/Tamimler/6877A%20say%20Dikili%20Sat%20Tamimi.pdf.</p> <ul style="list-style-type: none"> Order of GDF no: 288, rules of harvesting of timber, https://www.ogm.gov.tr/ekutuphane/Tebliğler/Forms/AllItems.aspx <p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Forestry (GDF) <p>Legally required documents or records</p> <ul style="list-style-type: none"> Standing Trees Selling Contract and relevant document as annexed, http://www.ogm.gov.tr/ekutuphane/Tamimler/6877A%20sayılı%20Dikili%20Satış%20Tamimi.pdf 	<ul style="list-style-type: none"> Personal communication 12 – Chief Forester, Istanbul Regional Directorate of Forestry <p>Non-Government sources</p> <ul style="list-style-type: none"> Transparency International (2017): Transparency International's Corruption Perceptions Index 2016: https://www.transparency.org/news/feature/corruption_perceptions_index_2016 World Bank (2016): Worldwide Governance Indicators 2014: http://info.worldbank.org/governance/wgi/index.aspx#reports Personal communication 17 - Professor, Istanbul University. Faculty of Law. Department of Forestry and Environmental Law 	<p>case of standing timber, the volume and quality of the standing timber is always compared and reassessed after the felling process and the estimate may change, which will also make the harvesting fee change.</p> <p>No royalties or fees are required for private forests or public forests. There are no taxes to be paid based on the classification of quantities, qualities and species</p> <p>Description of risk No cases of false classification of information in order to reduce the harvesting fee have been identified. There are also no systematic cases of lack of payment afforestation fees (personal communication 3, 12 and 17). While Turkey had a CPI of 41 (below the threshold of 50) in 2016. According to the World Bank Worldwide Governance Indicators, - on a scale of -2,5 to 2,5– in 2014 Turkey received a score of 0.38 for Governance Effectiveness, 0.04 on Rule of Law and -0.12 for Control of Corruption. These scores indicate that it is possible that corruption takes place in Turkey. However, based on experience from experts within the field of forestry there are currently no indications that harvesting and afforestation fees are not paid as required. Therefore, the risk of nonpayment of the afforestation fee therefore is low.</p> <p>Risk conclusion This indicator has been evaluated as low risk for state forest. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities/or by the relevant entities.</p> <p>N/A for private and public forests.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
1.6 Value added taxes and other sales taxes	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Law on Value Added Tax of 1984, No:3065, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.3065.pdf <p>Legal Authority</p> <ul style="list-style-type: none"> Turkish Financial Ministry, Department of Tax Collection (Gelir İdaresi Başkanlığı) www.gib.gov.tr <p>Legally required documents or records</p> <ul style="list-style-type: none"> Tax Declaration Form 	<p>Government sources</p> <ul style="list-style-type: none"> Cakmak, T. (N.Y.). VAT System in Turkey. Turkish Revenue Administration. https://www.oecd.org/mena/competitiveness/45573653.pdf Personal communication 3 – Director, Istanbul Regional Forestry District <p>Non-Government sources</p> <ul style="list-style-type: none"> Deloitte. 2006. VAT in Turkey - Finding the right path to improve your business. http://www.verginet.net/UserFiles/File/pusula_serisi/VAT.pdf Transparency International (2017): Transparency International's Corruption Perceptions Index 2016: https://www.transparency.org/news/feature/corruption_perceptions_index_2016 World Bank (2016): Worldwide Governance Indicators 2014: http://info.worldbank.org/governance/wgi/index.aspx#reports 	<p>Overview of Legal Requirements</p> <p>According to the Law on Value Added Tax of 1984 a taxpayer, when making any payment for buying any commodity, service etc. value added tax shall be paid. The percentage of VAT in Turkey is 10 percent. However, the government has the discretion to set the percentage of VAT within a range of 1-18 percent dependent of the product. So far this has not been applied to any timber products, which means that the VAT for timber products is 10 percent.</p> <p>In Turkey a buyer may be a natural person or a legal entity. For both it is a requirement by law to be registered at the Chamber of Commerce as a tax payer. When registered as a legal entity/corporation corporate tax and VAT must be paid. When registered as a natural person, income tax and VAT must be paid. Documentation for proving registration as a natural person and legal entities is required to be submitted to GDF.</p> <p>With respect to tax laws, all business within the timber industry shall be tied with a contract. If not, the owner may be accused of violating the tax law.</p> <p>Turkish tax authorities impose a procedural non-compliance penalty for the late submission of a VAT return. Late payment of VAT is subject to a monthly delay charge of 2.5 % (with effect from 21 April 2006) (Deloitte 2016).</p> <p>All of the above applies for all source types.</p> <p>Description of risk</p> <p>VAT is calculated on the basis of the final sale prices of all sales and paid once a month. The volume of timber is recorded by the owner himself and there is no mechanism for monitoring and controlling these calculations done by the tax office. The usage of oral agreements is very common in farm land plantation forests and private forests/plantations, which may enhance the risk of failing to disclose potential tax payments to the tax office.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>In rural areas, the control and monitoring mechanism done by the tax office may be challenged by the large areas and distances. However, no incidences have been reported in connection with the monitoring (personal communication 3).</p> <p>Difficulty in voluntary compliance, false or misleading invoices, and lack of auditing have been identified as problems in the Turkish VAT system by the Turkish Revenue Administration (Cakmak, N.Y.). This applies to all products in the whole country, and does not refer specifically to forests or forest products.</p> <p>In 2016, Turkey had a CPI of 41 (below the threshold of 50) and according to the World Bank Worldwide Governance Indicators, - on a scale of -2,5 to 2,5- in 2014 Turkey received a score of 0.38 for Governance Effectiveness, 0.04 on Rule of Law and -0.12 for Control of Corruption, indicating the country having some issues with the corruption level and legal compliance, which may influence the reporting and payment of VAT.</p> <p>Risk conclusion This indicator has been evaluated specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
1.7 Income and profit taxes	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Law on Income Tax of 1960, No: 193, http://www.mevzuat.gov.tr/MevzuatMetin/1.4.193.pdf (applicable for real persons harvesting from farm forests) 	<p>Government sources</p> <ul style="list-style-type: none"> Personal communication 3 – Director, Istanbul Regional Forestry District Personal communication 12 – Chief Forester, Istanbul Regional Directorate of Forestry <p>Non-Government sources</p> <ul style="list-style-type: none"> Transparency International (2017): Transparency International’s Corruption Perceptions Index 2016: 	<p>Overview of Legal Requirements</p> <p>According to the law on income tax and corporate tax, all tax payers shall pay either income or corporate tax if they make a profit. A tax payer is required to declare the annual income and thus calculate the amount of tax to pay. Income and corporate tax is calculated on the basis of the generated profit.</p> <p>State forest and thus GDF are not required to pay income or corporate tax.</p> <p>Description of risk</p> <p>The tax authorities make control checks, which are conducted following yearly monitoring plans that determine who should be controlled and</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<ul style="list-style-type: none"> Law on Corporate Tax of 2006, No: 5520, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.5520.pdf (applicable for companies and cooperatives) <p>Legal Authority</p> <ul style="list-style-type: none"> Turkish Financial Ministry, Department of Tax Collection (Gelir İdaresi Başkanlığı) www.gib.gov.tr <p>Legally required documents or records</p> <ul style="list-style-type: none"> Tax Declaration Form 	<p>https://www.transparency.org/news/feature/corruption_perceptions_index_2016</p> <ul style="list-style-type: none"> World Bank (2016): Worldwide Governance Indicators 2014: http://info.worldbank.org/governance/wgi/index.aspx#reports Personal Communication 6 – Researcher, Poplar and Fast Growing Trees Research Institute Personal communication 17 - Professor, Istanbul University. Faculty of Law. Department of Forestry and Environmental Law 	<p>when. The monitoring plans include random samples and high risk persons and companies. Along with this, the tax authority is also making random control visits.</p> <p>In state forest and public forest, all volumes are recorded, making it difficult for e.g. contractors to avoid tax payment. Cases of timber being sold without legal sales documentation, with wrongly stated volumes or below the market price is very rare and no cases have been recorded (personal communication 3, 17). According to personal communication the risk of manipulation with gross income to avoid paying taxes is not a common issue within the forestry sector in Turkey (personal communication 3, 12, 17).</p> <p>For private plantation and farm land plantation forest, owners are not required to sign a written selling contract for harvesting, meaning that the responsibility of declaring the income tax/corporate tax lies upon the owner (expert interview 3 and 6). Oral agreements are the common way of agreements made between the owner and contractor for private plantation and farm land plantation forest. As sales are not necessarily recorded there is a risk that income tax is not being paid. There is no written evidence to verify the situation for private forest land, and the risk is considered specified due to the precautionary approach.</p> <p>Risk conclusion This indicator has been evaluated as specified risk for private forest. 'Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p> <p>Low risk for state forest and public forest Threshold (1) is met: Identified laws are upheld. Cases where laws/regulations are violated are efficiently followed up via preventive actions are taken by the authorities and/or by the relevant entities.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
Timber harvesting activities			
1.8 Timber harvesting regulation	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Forest Code of 1956, No: 6831, articles 27, 40, http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf Regulation on Forest Product Harvesting (Orman Emvalinin İstihsaline Ait Yönetmelik) published in official Gazette, No: 19231, Date: 24.09.1986. http://mevzuat.basbakanlik.gov.tr/Metin.Aspx?MevzuatKod=7.5.5441&MevzuatIliski=0&sourceXmlSearch=emval Regulation on Forest Management Planning (Orman Amenejmanı Yönetmeliği), http://mevzuat.basbakanlik.gov.tr/Metin.Aspx?MevzuatKod=7.5.11952&MevzuatIliski=0&sourceXmlSearch=orman GDF, Order of GDF, No. 6877/A, Standing Tree Selling Guideline (Dikili Ağaç Satış Esasları), https://www.ogm.gov.tr/ekutuphane/Tamimler/6877A%20say 	<p>Government sources</p> <ul style="list-style-type: none"> GDF (2012). Orman İdaresi ve Planlama Dairesi Başkanlığı (2012) Hizmet İçi Eğitim Ders Notları. (forestry administration and planning department. In-service training. Course notes), Ankara. Available at: http://ormuh.org.tr/arsiv/files/Orman%20Idaresi%20ve%20Planlama.pdf GDF. (N.Y.). İşletme ve pazarlama dairesi başkanlığının görevleri. (Duties of the President of Business and Marketing) Available at: https://www.ogm.gov.tr/Baskanliklar/IsletmevePazarlama/Sayfalar/isletme_ve_Pazarlama.aspx pdh (2016). Guidelines of professional forestry work 2016. Available at: http://pdh.ormansu.gov.tr/personel/Files/eKitap/2016/index.html#p=60 Personal communication 3 – Director, Istanbul Regional Forestry District Personal communication 12 – Chief Forester, Istanbul Regional Directorate of Forestry <p>Non-Government sources</p> <ul style="list-style-type: none"> Personal communication 18 - Environmental NGO 	<p>Overview of Legal Requirements</p> <p>The Regulation on Forest Product Harvesting contains provisions on how the timber shall be felled, regulation on high slopes/shallow soils, how to cut the logs, how to prevent seedlings from damage, how to transport the timber from the forest to the storage facility. The annual harvesting activities are planned one year before the actual harvesting occurs, along with specification of the annual allowable cut, tree species, harvesting site etc.</p> <p>In order to determine high-slope areas, foresters use digitised topographic maps (of military origin) at 1/25,000 scale, or SRTM maps derived from satellite images, which provide a digital elevation model of the whole country at resolutions ranging from 50-100 metres. Using these base maps, foresters determine the slope angles for each forest stand and decide whether they are to be designated as having erosion control or flood regulation functions</p> <p>By law, contractors and forest villagers should take all necessary preventive measures required in the Standing Tree Selling Guidelines and permit when harvesting trees.</p> <p>Description of risk</p> <p>A high number of the workers working in the forests in Turkey have low or no training within the field. Although there are no requirements about the forest workers being trained, this low level of knowledge about the legal requirements in the regulation for harvesting activities poses a risk of violating the legislation, simply because the workers are not aware that these requirements exist (personal communication 3, 18)</p> <p>The chief forester of each district is in the forest and is the one to control and monitor that harvesting regulations are being upheld. However, the forest districts are often large areas of land and the chief forester might not be aware of/trained in the specific legal requirements. GDF does</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>%C4%B1%C4%B1%20Dikili%20Sat%C4%B1%C5%9F%20Tamimi%20EK-1%20%C4%B0%C5%9Flenmi%C5%9F%201.pdfGDF, 2014c. Technical Regulations of Silvicultural Applications: Regulatory Document No: 298. General Directorate of Forestry. Ankara (in Turkish)</p> <p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Forestry (GDF) <p>Legally required documents or records</p> <ul style="list-style-type: none"> Forest Management Plan Silviculture Plans 		<p>occasionally offer training events, but the chief forester does not necessarily hold a baseline education in forestry and thus the chance of the chief forester having received training in the harvesting regulation requirements are low, and the chance of identifying violations are low. On a national level, all new foresters employed to work for GDF will attend a 6 months training program covering subjects such as forest crimes, insects etc. (personal communication 12).</p> <p>A complaint by the public, NGO, etc. can report to the relevant authority such as public prosecutor (if there is a large damage to the environment) or independent investigators of Prime ministry may handle the issue and report the case to the politicians or the courts system. There are many reported cases about mining, but not on forestry practices.</p> <p>Due to lack of training of forest personel, and the lack of information from the field, the risk is considered specieifed specified based on the precautionary approach.</p> <p>Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
1.9 Protected sites and species	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Law on National Parks of 1983, No: 2873, 	<p>Government sources</p> <ul style="list-style-type: none"> DKMPGM (2013) Technical Bulletin: The Last Ten Years in Nature Protection, Ankara, http://www.milliparklar.gov.tr/dergi/3/?sflang=tr#/0 	<p>Overview of Legal Requirements There are three different ways to classify protected areas/sites:</p> <ul style="list-style-type: none"> Protected area (such as national parks, nature parks, wildlife conservation areas) Protection function (e.g. closed off from management activities due to danger of erosion. This will be covered under indicator 1.10)

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>http://www.mevzuat.gov.tr/MevzuatMetin/1.5.2873.pdf</p> <ul style="list-style-type: none"> Forest Code of 1956, No: 6831, (Orman Kanunu) http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf GDF, 2014b. Methods and Principles for Making Ecosystem Based Functional Forest Management Plans: Regulatory Document No: 299. General Directorate of Forestry. Ankara (in Turkish) GDF, 2014c. Technical Regulations of Silvicultural Applications: Regulatory Document No: 298. General Directorate of Forestry. Ankara (in Turkish) <p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Nature Protection and National Parks www.milliparklar.gov.tr 	<ul style="list-style-type: none"> DKMPGM (2014) Nature Protection Status Report, Ankara, http://www.milliparklar.gov.tr/kitap/150/?sflang=tr#p=1 Personal communication 12 – Chief Forester, Istanbul Regional Directorate of Forestry <p>Non-Government sources</p> <ul style="list-style-type: none"> Personal communication 16 – Forest engineer, Rural Environment and Forestry Foundation Personal communication 18 – Environmental NGO 	<ul style="list-style-type: none"> Protected site (limited area). The protected site covers a single tree (national monument) or a small area protected for biodiversity. <p>By law protected areas are not open for commercial timber harvesting. The protected areas are covered by a management plan for the forest district, as well as a Long Term Development plans. A 'Long Term Development plan' is a management/conservation plan for legally protected areas, where the area is divided into protection functions (strict protection, limited use, and buffer zones), according to the presence and distribution of 'source values' (natural or historical values) of the area.</p> <p>When new Long Term development plans are developed, the chief forester, along with relevant experts of nature protection, will inspect the premises for potential new protected function areas or species to be mapped and included in both Long Term Development plan (unlimited time period) and the management plan. If identified in the duration of the management plan (10 or 20 years), this will be reported to the General Directorate of Nature Protection and Natural parks and the ongoing management plan will be updated with relevant information. The planned inspection is only performed by trained foresters.</p> <p>If an area is of interest of being protected a special expert report is prepared to designate a particular area having protection values. The report is attached to the written request and submitted to the authorities. If an area is inside the forest boundary the request is submitted to the Ministry of Forest and Water affairs, who can declare an area as nature park, natural monument or nature reserve area. If the area has national park characteristics, regardless of its being inside or outside of forest boundary the government is authorized to declare such an area as protected area/National park.</p> <p>The GDF may do forest amelioration (recovering degraded land) in the areas classified as protected. This is done if and when there are dead trees and wood that may cause diseases, insect invasion etc.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<ul style="list-style-type: none"> • General Directorate of Forestry (GDF) www.ogm.gov.tr <p>Legally required documents or records</p> <ul style="list-style-type: none"> • Long term National Park Development Plans • Management plan 		<p>If private areas are to be protected it will first be confiscated and can following be declared protected.</p> <p>Within managed forests, areas with rare, threatened and endangered species shall be mapped and designated as having a nature conservation function, limiting or totally restricting forestry operations in these areas. This requirement has been in place since 2014 with the introduction of the Regulatory Document No: 299.</p> <p>Description of risk If an area is classified as a protected area, the protection function is considered and implemented in the management plan. If the timber harvested from protected areas due to maintenance is worthy of sales, it is sold via the auctions held by GFD.</p> <p>Environmental NGOs often plays a role in the monitoring and mapping the protected areas. Their approach to this is not systematic, but more random monitoring and mapping (personal communication 16). The General Directorate of Nature Protection and Natural parks have people on the ground, monitoring violations in the protected areas. Timber harvesting in protected areas, for amelioration/conservation purposes, have been carried out in approximately 3-5 percent of all protected areas. In these cases, no legal violations have been recorded so far (personal communication 12).</p> <p>As mentioned in indicator 1.3. Management and harvesting planning, a large part of the Turkish forests has only recently or are still in the process of getting an updated management plan according to the principle of functional planning. This means that for some forest areas the important areas for biodiversity may not yet have been included in the forest management plans. Also, according to experience from the field (Personal communication 18) many forest managers do still not comply with the relative newly introduced requirements from 2014 on protection of areas set aside in the forests. Based on this, the risk for indicator 1.9 is considered specified.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>Risk conclusion Protected areas. This indicator has been evaluated as low risk. Threshold (1) is met: Identified laws are upheld. Cases where laws/ regulations are violated are efficiently followed up via preventive actions are taken by the authorities and/or by the relevant entities.</p> <p>Forests outside protected areas This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
1.10 Environmental requirements	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Environmental Law of 1983, No: 2872 and decree No: 6877A http://www.mevzuat.gov.tr/MevzuatMetin/1.5.2872.pdf Regulation on Forest Product Harvesting (24.09.1986) (Orman Emvalinin İstihsaline Ait Yönetmelik) published in official Gazette, No: 19231, http://mevzuat.basbakanlik.gov.tr/Metin.Aspx?MevzuatKod=7.5.5441&MevzuatIlski=0&sourceXmiSearch=emval Order of GDF, 2015, No. 6877/A, Standing Tree 	<p>Government sources</p> <ul style="list-style-type: none"> Ministry of Environment & Forestry, (COB), 2007, Manuel of Environmental Monitoring, Ankara, ISBN: 978 – 975 – 8273 – 98 0, http://www.cygm.gov.tr/CYGM/Files/yayinlar/kitap/denetim-el-kitabi.pdf GDF, Order of GDF, No. 6877/A, Standing Tree Selling Guideline (Dikili Ağaç Satış Esasları), https://www.ogm.gov.tr/ekutuphane/Tamimler/6877A%20say%C4%B1%C4%B1%20Dikili%20Sat%C4%B1%C5%9F%20Tamimi%20EK-1%20%C4%B0%C5%9Flenmi%C5%9F%201.pdf Personal communication 12 – Chief Forester, Istanbul Regional Directorate of Forestry <p>Non-Government sources</p> <ul style="list-style-type: none"> Personal communication 18 - Environmental NGO 	<p>Overview of Legal Requirements Pollution of air and water is prohibited by law according to the Environmental law. The law does not mention any specific requirements in connection with forest management.</p> <p>The regulatory document 298 on silvicultural management gives general guidelines, which serve in conservation of species in the production forests, such as leaving the wild fruit trees untouched or using the same skidways to carry logs out of the forest to minimize the effect on soil or leaving deadwood, 1-3 snags and logs per ha. untouched in the forest to benefit dependent species etc. Forest areas where values for soil, water and conservation are identified will be designated as ecological function.</p> <p>The decree no: 6877A from 2015 specifically states that in the case of harvesting and sales of standing timber, the contractor shall take all necessary measures to protect environmental values inside harvesting areas. The decree mentions how to fell the trees with respect to direction, seasonal harvesting, when to build bridges and to take all necessary precautions for nesting areas and for seedlings.</p> <p>There are no requirements for Environmental Impact Assessment (EIA) for forestry harvesting operations.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Selling Guideline (Dikili Ağaç Satış Esasları) https://www.ogm.gov.tr/ekutuphane/Tamimler/6877A%20say%C4%B1%C4%B1%20Dikili%20Sat%C4%B1%C5%9F%20Tamimi%20EK-2%20%C4%B0%C5%9Flenmi%C5%9F.pdf</p> <ul style="list-style-type: none"> • Law on National Parks of 1983, No: 2873, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.2873.pdf • Forest Code of 1956, No: 6831, (Orman Kanunu), http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf • Mining Law of 1985, No: 3213, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.3213.pdf • Law on Soil Protection and Land Use of 2005, No: 5403, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.5403.pdf • GDF, 2014b. Methods and Principles for Making Ecosystem Based Functional 		<p>Description of risk Although regulations for water pollution exist, the laws are not being applied in practice in the forests. The Ministry of Environment is responsible for implementing and monitoring compliance with the legislation, but no such control and monitoring is being done in the forest, neither by the ministry or the local environmental offices (personal communication 12). The GDF does not have any obligations, nor expertise to control and monitor the compliance with requirements in the environmental legislation.</p> <p>The older management plans do not contain information about relevant environmental measures to be taken into account when managing the forests. According to personal communication 18 the environmental requirements are still not systematically implemented. The issue is often grounded in that environmental requirements have been relatively newly introduced and older forest chiefs do not always follow them, while younger forest chiefs are more accustomed with the requirements and are following legislation.</p> <p>Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Forest Management Plans: Regulatory Document No: 299. General Directorate of Forestry. Ankara (in Turkish)</p> <ul style="list-style-type: none"> • GDF, 2014c. Technical Regulations of Silvicultural Applications: Regulatory Document No: 298. General Directorate of Forestry. Ankara (in Turkish) <p>Legal Authority</p> <ul style="list-style-type: none"> • General Directorate of Nature Protection and National Parks, www.milliparklar.gov.tr • General Directorate of Forestry (GDF), www.ogm.gov.tr • General Directorate of Environmental Management, www.cygm.gov.tr <p>Legally required documents or records</p>		

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<ul style="list-style-type: none"> Silvicultural plans Management plans 		
1.11 Health and safety	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Labour Law of 2003, No: 4857, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.4857.pdf Law on Labour Health and Safety of 2012, No: 6331, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.4857.pdf Regulation on Work Safety and Health (published official gazette No: 25311, Date: 09.12.2003), ILO Convention for Labour Organization, http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:1:0::NO <p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Work Safety and Health, 	<p>Government sources</p> <ul style="list-style-type: none"> Ministry of Environment & Forestry, (COB), 2007, Manuel of Environmental Monitoring, Ankara, ISBN: 978 – 975 – 8273 – 98 0, http://www.cygm.gov.tr/CYGM/Files/yayinlar/kitap/denetim-el-kitabi.pdf GDF, Order of GDF, No. 6877/A, Standing Tree Selling Guideline (Dikili Ağaç Satış Esasları), https://www.ogm.gov.tr/ekutuphane/Tamimler/6877A%20say%C4%B1%C4%B1%20Dikili%20Sat%C4%B1%C5%9F%20Tamimi%20EK-1%20%C4%B0%C5%9Flenmi%C5%9F%201.pdf TUIK, 2016, News Bulletin: Dead Statistics, Ankara http://www.tuik.gov.tr/PreHaberBultenleri.do?id=21526 Personal communication 3 – Director, Istanbul Regional Forestry District <p>Non-Government sources</p> <ul style="list-style-type: none"> Enez, K., Topbas, M. and Acar, H.H., 2014. An evaluation of the occupational accidents among logging workers within the boundaries of Trabzon Forestry Directorate, Turkey. <i>International journal of industrial ergonomics</i>, 44(5), pp.621-628. 	<p>Overview of Legal Requirements</p> <p>According to Labour Law of 2003 (No: 4857, article 14) and Law on Labour Health and Safety 2012 (No: 6331, article 4 and 19) an employer shall take all necessary preventive measures in regards to work place health and safety. The employer is obligated to inform and train all employees about health and safety requirements and provide them with the necessary health and safety equipment for field work. Both laws also require that each single employer provides access to a health center for the regular care of workers and contracts a doctor in case of emergencies.</p> <p>The legal requirements are the same for all source types. However, if an owner of a farm land plantation forest has the capacity to perform the harvesting himself, he himself is exempted from the law of health and safety requirements. If he contracts staff to work for him he needs to apply to the regulation. In private forest, the responsibility lies upon the Forest Director. Private forest owners usually hire external workers to conduct maintenance harvesting.</p> <p>For state forests, the Chief Forester is the person responsible for controlling the workers hired to work in the forests. The forest rangers take part in the control of health and safety requirements being adhered to, which they do on behalf of the chief forester. In the case of contractors and buyers of standing timber units, the responsibility for training the workers and providing them with the correct equipment is on the contractor/buyer and the provisions are included in the contract. However, GDF still has the overall responsibility of controlling that this is being adhered to in the state forests, whether it is contracted/sale of standing timber or not. When harvesting is implemented, a harvesting file is created. This file contains all relevant documents for the harvesting unit, including a document in which the access and use of safety equipment is declared.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>http://www3.csgb.gov.tr/csgbPortal/isggm.portal</p> <ul style="list-style-type: none"> General Directorate of Forestry (GDF), www.ogm.gov.tr General Directorate of Environmental Management, www.cygm.gov.tr <p>Legally required documents or records</p> <ul style="list-style-type: none"> Records of safety equipment Work place safety documents 	<ul style="list-style-type: none"> Melemez, K., 2015. Risk factor analysis of fatal forest harvesting accidents: A case study in Turkey. <i>Safety science</i>, 79, pp.369-378. Personal communication 5 – Expert Forester, Free Contractor 	<p>This document is signed by each worker every day, stating that they have and wear the required equipment. The Chief Forester holds this document and is responsible for the monitoring.</p> <p>Description of risk Cases of non-compliance with the health and safety requirements have been reported for the forest industry, but they are said to be very rare and only a few cases have been reported (personal communication 3). However, there is a risk that violations take place and enforcement efforts are not able to detect them, and that violations are not reported. In practice, the size of forest districts is likely to make physical controls/audits of activities difficult.</p> <p>Information on the enforcement of health and safety regulations in Turkey is scarce. Unfortunately, there is no regular data recording system with respect to forestry and occupational safety (Enez et al., 2014). It is known, however, that the number of fatal accidents occurring at work not decreasing in forestry operations in Turkey (Melemex, 2015). This does not indicate legal violations, however it has been stated that possible reasons of this may include employing seasonal forestry workers and the lack of personal protective equipment and safety training (Melemex, 2015).</p> <p>A report from 2015 found that personal and organisational factors were ranked as the most important causes of fatal forest harvesting accidents (Melemex, 2015). Within these, the “sub-factors” of positioning in dangerous zones, carelessness, disorderly behaviour, unsuitable selection of workers, unsuitability to work and insufficient training of workers were the most important. However, the presence of actual or potential legal violations was not studied.</p> <p>Due to a lack of comprehensive information, and evidence from some studies that health and safety equipment is not regularly used during forestry activities, the precautionary approach is followed, and specified risk is designated.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
1.12 Legal employment	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Labour Act of 2003, No:4857, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.4857.pdf Law on Social Security and General Health Insurance of 2006, No: 5510, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.5510.pdf Law on Labour Health and Safety of 2012, No: 6331, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.4857.pdf ILO Convention for Labour Organization, http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:1:0::NO:: 	<p>Government sources</p> <ul style="list-style-type: none"> CSGB, Risk Assessment and Control List in Wood Harvesting http://www3.csgeb.gov.tr/csgebPortal/ShowProperty/WLP%20Repository/isggm/dosyalar/OdunUretimIslerindeRDKL GDF, Order of GDF, No. 6877/A, Standing Tree Selling Guideline (Dikili Ağaç Satış Esasları), https://www.ogm.gov.tr/ekutuphane/Tamimler/6877A%20say%C4%B1%C4%B1%20Dikili%20Sat%C4%B1%C5%9F%20Tamimi%20EK-1%20%C4%B0%C5%9Flenmi%C5%9F%201.pdf Personal communication 3 – Director, Istanbul Regional Forestry District <p>Non-Government sources</p> <ul style="list-style-type: none"> Chambers and Partners. 2016. Employment & Labour Law International Series, Turkey Chapter, 6th Edition. https://www.chambersandpartners.com/article/187/employment--labour-law-international-series-turkey-chapter-6th-edition International Trade Union Confederation (ITUC). 2012. Internationally Recognised Core Labour Standards in Turkey Report for the WTO General Council Review Of The Trade Policies Of Turkey 	<p>Overview of Legal Requirements The Turkish Labour Act 4857 (the Labour Act), which is the basic code that regulates individual employment relationships. Furthermore, the Law on Trade Unions and Collective Bargaining Agreements 6356 (the Union Law) and the Law on Civil Service Trade Unions and Collective Bargaining Agreements 4688 are the main codes which ensure provisions and regulations regarding collective bargaining agreements. The Turkish Code of Obligations 6098 (the Obligations Code) contains provisions with regard to employment contracts and regulates the rights and obligations of employees such as the right to remuneration, duty of care, duty of loyalty, non-competition and confidentiality. Secondary laws consist of by-laws and regulations including labour inspection, annual leave, working hours, overtime work, minimum wage and female and child employees. Other than that, there are also communiques and circulars published by the Ministry of Labour and Social Security with regard to the application and recommendation of labour legislation. (Chambers and Partners, 2016)</p> <p>Turkey is a party to numerous international treaties with regards to employment law matters. Some ILO treaties recognised under Turkish Law are:</p> <p>ILO Convention no. 2 - Unemployment Convention. ILO Convention no. 11 - Right of Association (Agriculture) Convention. ILO Convention no. 26 - Minimum Wage-Fixing Machinery Convention. ILO Convention no. 29 - Forced Labour Convention. ILO Convention no. 87 - Freedom of Association and Protection of The Right To Organise. ILO Convention no. 98 - Right To Organise and Collective Bargaining Convention. ILO Convention no. 100 - Equal Remuneration Convention.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Work Safety and Health, http://www3.csgb.gov.tr/csgbPortal/isggm.portal General Directorate of Forestry (GDF), www.ogm.gov.tr General Directorate of Environmental Management, www.cygm.gov.tr <p>Legally required documents or records</p> <ul style="list-style-type: none"> Contract on Independent Contractor of Forest Workers (Vahidi Fiyat Sözleşmesi) Labour contract for people working in state, public and private forest Insurance policy documents 	<p>(Geneva, 21 And 23 February, 2012). https://www.ituc-csi.org/IMG/pdf/tpr_turkey-final_.pdf</p> <ul style="list-style-type: none"> Personal communication 9 – Forest villager from a development cooperative Nihat Eğri, ve diğ. 2013, Dünyanın Çeşitli Ülkelerinde İş Sağlığı ve Güvenliği Ceza Uygulamaları, Ankara (The criminal practices of labor security and health at several countries in the world), http://www.isgum.gov.tr/rsm/file/isgdoc/IG19-dunya_ulkerinde_isg_ceza_uygulamaları.pdf 	<p>ILO Convention no. 102 - Social Security (Minimum Standards) Convention. ILO Convention no. 105 - Abolition of Forced Labour Convention.</p> <p>Furthermore, the European Convention on Human Rights was ratified by Turkey on 10 March 1954 and thus, several provisions regarding employment relationships such as the prohibition against forced labour and the right to establish trade unions, have also been accepted under Turkish law. The Labour Act states that “No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship.”</p> <p>According to the Labour Act, workers must be over the age of 18 years old. However, the law states that an employer may hire a so called “rooky” who is 16-18 years old as long as the employer ensures that they are not involved in hard work, such as timber harvesting, mining etc. Likewise, women cannot be hired to do what is deemed to be hard work.</p> <p>For all workers, a pension payment, social security payment, health insurance and retirement payment are to be set up and or bought. These requirements are different for a rooky, meaning that payment and insurance requirements are different for them. The rookies are not entitled to get the retirement payment. When a temporary/seasonal worker other than forest villagers is hired, there is no obligation to buy a social security bond for him or her.</p> <p>When a GDF signs a contract with a forest villager, the villager is considered as an independent contractor according to the Law on Social Security of 2006 No: 5510. This means that all security and insurance issues lies upon the villager himself. It is the discretion of the villager himself to buy a social security bond from the State Social Security Office. If the forest villager hires someone to do the harvesting, he is obliged to buy a social security bond according to the law.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<ul style="list-style-type: none"> Social Security ID Card 		<p>In farm land plantation forest they often use their family members to do the work in the forest. According to the law on Social Security (art. 4 and 5), if family members (spouse or children under the age of 18) work for you, you are not required to pay social security for them and they do not need to have a labour contract.</p> <p>Description of risk The Regional Labour Office is responsible for making daily controls and monitoring workplaces in both rural and urban areas, to check if the legislation is violated by the employer. In rural areas, this work is difficult due to the large areas that must be covered. In practice, more control is done in urban areas by the Regional Labour Office and it is not clear whether such employment monitoring programs are implemented in rural areas (personal communication 3). The Regional Forestry Directorate are said to monitor compliance (personal communication 3 and 9).</p> <p>Even though the employer must report his employees to the Regional Labour Office, the lack of control in rural areas means it is possible that incorrect information is given and not all employees are reported. It is therefore considered that there is a risk of illegal employment in the forest, due to a lack of enforcement in rural areas (predominantly where forests are found) and because illegal/unreported workers could easily be hidden when controls are conducted.</p> <p>Since the payment for social security etc. is quite high for the forest villagers, compared to their earnings, they themselves may often decide not to pay it (personal communication 3). The same applies for the forest villager's family members who are often included in the harvesting activities together with the forest villager (personal communication 3).</p> <p>Forced labour and human trafficking occur in Turkey (ITUC, 2012). Most of the trafficking cases relate to prostitution of women from Eastern Europe and forced labour of persons from Central Asia, and this issue does not appear to affect forestry. Some children are reported to be trafficking</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>victims coerced into becoming beggars, drug dealers and pickpockets. 41% of children are employed in agriculture (ITUC, 2012), which may include forestry. Elsewhere, child labour is listed as a problem in the production of cotton, hazelnuts, citrus fruits, sugar beets, cumin, peanuts, pulses, apricots, melons, and cherries, and forestry is not referred to (Bureau of International Labour Affairs, 2017)</p> <p>Risk conclusion Specified risk. This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
Third parties' rights			
1.13 Customary rights	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Forest Code of 1956, No: 6831, articles 30, 31, 32, 33, 34, 35, 36, 37, 398, 40. http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf Regulation on issuing transportation license of forest products, articles 7, 13, 21 https://www.ogm.gov.tr/ekutuphane/Yonetmelikler/Orman%20Ürünlerine%20Verilecek%20Tezkerelere%20Ait%20Yönetmelik.pdf 	<p>Government sources</p> <ul style="list-style-type: none"> GDF Annual Activity Report, Ankara (2015), https://www.ogm.gov.tr/ekutuphane/FaaliyetRaporu/Orman%20Genel%20Müdürlüğü%202015%20Yılı%20Faaliyet%20Raporu.pdf Regulation on Issuing Transport License for Forest Products (Orman Ürünlerine Verilecek Taşıma Belgelerine Ait Yönetmelik) https://www.ogm.gov.tr/ekutuphane/Yonetmelikler/Orman%20Ürünlerine%20Verilecek%20Tezkerelere%20Ait%20Yönetmelik.pdf <p>Non-Government sources</p> <ul style="list-style-type: none"> Alkan, H. and Kilic, M., 2014. Forests and forestry organizations from the forest villagers' perspective: a case study from Turkey. <i>iForest-Biogeosciences and Forestry</i>, 7(4), p.240. 	<p>Overview of Legal Requirements Turkey's rural inhabitants are divided into two groups, namely forest villagers and the other villages, with approximately seven million forest villagers residing in over 21 000 forest villages (Alkan & Kilic, 2014). The Forest Law divides forest villages into those located inside forests (article 31 villages) and near forests (article 32).</p> <p>By law, the forest villagers (a person who resides in a forest village for a period of five years is considered a forest villager), both individuals and established forest villagers' development cooperatives (the largest) and most effective stakeholders nearest the operations site), have a right to be hired for timber harvesting in the state forests within their boundaries of their village. According to the article 40 of the Forest Code tree harvesting, thinning, pruning, transportation, afforestation, wood collection etc. can and should be delegated to forest villagers or forest villagers' development cooperative as far as possible, meaning that villagers should have preference for employment over outsiders.</p> <p>For commercial collection of firewood, non-wood forest products, etc., a harvesting license and a small payment is required from the forest villagers</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Forestry (GDF) of Ministry of Forestry and Water Affairs <p>Legally required documents or records</p> <ul style="list-style-type: none"> Wood Collection License - for forest villagers 	<ul style="list-style-type: none"> Tolunay, A. and Alkan, H., 2008. Intervention to the Misuse of Land by the Forest Villages: A Case Study from Turkey. <i>Ekoloji Dergisi</i>, 17(68). Redman, M. and Hemmami, M., 2008. Developing a national agri-environment programme for Turkey. <i>Bugday Ekolojik Yasamı Destekleme Dernegi, Istanbul</i>. Personal communication 9 - Forest villager from a development cooperative 	<p>to obtain the license (Regulation on issuing transportation license of forest products, articles 7, 13, 21). Only residents of a village can obtain this license for commercial collection within the boundaries of their village.</p> <p>If the same activities are for household purposes, the villagers are free to enter the forest for collecting non-timber forest products. However, for firewood, the villagers (each household) can request a license from the local forestry district to be allowed to collect wood residues. The license can be obtained in a particular time period and it is usually valid for 3-4 weeks, and limited to a specific harvesting site. It is issued by the Chief Forester and there is no payment for the license. The period in which they can request it follows the harvesting plan for the district. Villagers can sell wood that is surplus to their needs.</p> <p>The law also states that forest villagers can ask forestry districts for wood for housing construction and repairs. The leader of the forest village (mukhtar) may also ask the chief forester for timber for construction or repairs of schools and mosques. In addition, those villagers have a right to purchase firewood from local forest enterprises by paying only harvesting costs (Forest Code, article 31).</p> <p>The forest law states that the access of any kind of domestic animal to forest is prohibited, except in cases of animal malnutrition in drought regions, and animals that belong to forest villagers (villages within their boundaries forest exist). This permission can be given under the terms and conditions of a given period, for the defined animal species and areas, and with the condition that no damage should be done to the forest.</p> <p>Description of risk In Turkey, there are a substantial amount of people living in forest villages. One forest villager stakeholder has stated that he was not familiar with any cases reported about the violation of the forest villagers' rights (personal communication 9).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>A study in the Sivas Directorate of Forest District interviewed over 1000 villagers with the aim of evaluating their opinions regarding the surrounding forests and forestry organizations, and satisfaction level with life in the forest village (Alkan & Kilic, 2014). The study found that “the forestry organization provided sufficient job opportunities to 77.1% of the respondents. While 12.5% of the respondents found job opportunities insufficient, 10.4% stated they were undecided on this issue.” This indicates that employment is provided to villagers, as it should be, but does not indicate whether (or not) positions are given to outsiders when they shouldn’t be. The authors also state that, consistent with most of Turkey, hardwood and firewood are supplied to forest villages in the area, indicating the fulfilment of that legal requirement. Due to insufficient resourced allocated for extension efforts, villagers are said to not be given adequate information on their other rights and privileges provided by law, with only laws associated with priority in forest work, ensuring wood-supply, and financial support are said to be the only implementations made clear to villagers, and only 8.4% of the villagers indicated their legal rights were fulfilled. It is not clear which other laws might apply that are not communicated to villagers. Villagers reported a dissatisfaction with forest laws concerning access to forest, but it appears the dissatisfaction relates to the content of the law, rather than whether it is or isn’t enforced.</p> <p>Discussions of forest villages and the use of forests by their inhabitants highlight the poor socioeconomic situation residents are in and the importance of forests to them (e.g. Tolunay & Alkan, 2008 and Redman & Hemmami, 2008). Illegality on the part of villagers may be raised as issues (e.g. illegal cutting and grazing), but violations by the forestry administration/workers is not raised as an issue. However, as there is scarce available information this does not provide strong assurance that such a risk does not exist and the risk has been evaluated as specified based on the precautionary approach.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
1.14 Free prior and informed consent	<p>Applicable laws and regulations</p> <p>Not applicable. There are no applicable laws or regulations related to FPIC in Turkey.</p> <p>Legal Authority</p> <p>N/A</p> <p>Legally required documents or records</p> <p>N/A</p>	N/A	N/A
1.15 Indigenous peoples rights	<p>Applicable laws and regulations</p> <p>Not applicable due to the absence of applicable laws and legislation. that protect the rights of indigenous peoples in Turkey.</p> <p>Legal Authority</p> <p>N/A</p>	N/A	N/A

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legally required documents or records</p> <p>N/A</p>		
Trade and transport			
<p>1.16 Classificat ion of species, quantities, qualities</p>	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Forest Code of 1956, No: 6831, articles 27, 40 and 41 http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf • Regulation on Forest Product Harvesting, article 15 and 16 (Orman Emvalinin İstihsaline Ait Yönetmelik) published in official Gazette, No: 19231, Date: 24.09.1986., http://mevzuat.basbakanlik.gov.tr/Metin.Aspx?MevzuatKod=7.5.5441&MevzuatIliski=0&sourceXmlSearch=emval • Regulation on the Means and Methods of Selling Forest Products (Orman Ürünlerinin Satış Usul ve Esasları Hakkında Yönetmelik) enacted based on Forest Code of 6831, Published in Official Gazette 20/3/2015 No: 29301., http://www.mevzuat.gov.tr/Meti 	<p>Government sources</p> <ul style="list-style-type: none"> • GDF, 2012, Seminar Notes (Orman İdaresi ve Planlama Dairesi Başkanlığı, Hizmet İçi Eğitim Ders Notlari, Ankara) http://ormuh.org.tr/arsiv/files/Orman%20Idaresi%20ve%20Planlama.pdf • Personal communication 3 – Director, Istanbul Regional Forestry District <p>Non-Government sources</p> <ul style="list-style-type: none"> • Transparency International (2016): Transparency Internationals Corruption Perceptions Index 2016: https://www.transparency.org/news/feature/corruption_perceptions_index_2016 • Personal communication 5 – Expert forester, Free Contractor • Personal communication 17 – Professor, Istanbul University, Faculty of Forestry. Department of Forestry and Environmental Law 	<p>Overview of Legal Requirements</p> <p>Regulation on Forest Product Harvesting has provisions (articles 15, 16) how to classify trees felled with respect to quality and record volumes, species, qualities, total price etc. into a special registry “irsaliye” (required by law) and filled in by the /accounting office of the local forestry enterprise after harvesting. The system is paper based, but following entered into a computer system. The information is open for authorities, but not publicly available. The registrations are carried out by expert foresters hired by contractors/buyers. The Chief Forester of the forestry enterprise conducts internal controls of the registration and whether it reflects the actual situation (personal communication 3).</p> <p>When the trees are sold as standing trees, the contractors classify timber with respect to quality, and species. Species and quantity is controlled by the Chief Forester to meet the requirements of selling contracts and payments.</p> <p>Timber is divided into quality of 1, 2 or 3 and price will be impacted by the grade of quality.</p> <p>The requirements are applicable for all state, private and public forest.</p> <p>Description of risk</p> <p>In order to put timber on the market timber will have to be registered in “irsaliye”. There is no independent controlling mechanism to correct incorrect classification. No taxes will have to be paid based on classification. Only incentive for providing wrong classification on legally harvested timber would be in the case of sale of standing timber, as the contractor in such case will have to pay less for the timber, which can be sold for processing to a higher price. This can only be allowed through corruption as the timber will have to be controlled by the chief forester. In</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>n.Aspx?MevzuatKod=3.5.20157255&Mevzuatlliski=0&sourceXmlSearch=Orman%20%C3%9Cr%C3%BCnlerin</p> <ul style="list-style-type: none"> Order of GDF, No. 6877/A, Standing Tree Selling Guideline (Dikili Ağaç Satış Esasları), https://www.ogm.gov.tr/ekutuphane/Tamimler/6877A%20say%C4%B1%C4%B1%20Dikili%20Sat%C4%B1%C5%9F%20Tamimi%20EK-1%20%C4%B0%C5%9Flenmi%C5%9F%201.pdf <p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Forestry (GDF), www.ogm.gov.tr Turkish State Safety and Public Security Directorate – Turkish Police Turkish Gendarmerie 		<p>2015 Turkey had a CPI of 42 (below the threshold of 50). Thus, the risk of corruption is present, but according to personal communication with experts within the field, wrongful classification is not considered to be a large scale issue in Turkey (Personal communication 3, 5, 17). According to Annual Activity Report of GDF, 2015, 708 cases and 949 m3 of timber has been reported as being unlawfully classified and/or not having legal transport license. This is 0,004% of the total harvested volume of 21.600.583m3 (industrial wood: 16.637.597 m3 and firewood: 5.022.986 m3) (GDF Annual Activity Report, 2015). The annual activity report does not clarify whether the reported cases relate to industrial wood or firewood. The recorded violation represents a miniscule proportion of the total volume, and together with expert statements, violation of the requirements for species, quantity and quality is not considered to be a large scale, systematic violation.</p> <p>Risk conclusion Low risk. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legally required documents or records</p> <ul style="list-style-type: none"> • Transport License issued by Local Forestry District • Invoice or bill of sales 		
1.17 Trade and transport	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Forest Code of 1956, No: 6831, articles 27, 40, 41, http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf • Regulation on Forest Product Harvesting (Orman Emvalinin İstihsaline Ait Yönetmelik) published in official Gazette, No: 19231, Date: 24.09.1986. http://www.mevzuat.gov.tr/Metin.Aspx?MevzuatKod=7.5.5441&MevzuatIlski=0&sourceXmISearch= • Regulation on issuing Transportation License for Forest Products (Orman Ürünlerine Verilecek Taşıma Belgelerine Ait Yönetmelik), articles 20, 24, 25, 32 	<p>Government sources</p> <ul style="list-style-type: none"> • Personal communication 12 – Chief Forester, Istanbul Regional Directorate of Forestry • GDF Annual Activity Report, 2015. Available at: https://www.ogm.gov.tr/ekutuphane/FaaliyetRaporu/Orman%20Genel%20Müdürlüğü%202015%20Yılı%20Faaliyet%20Raporu.pdf <p>Non-Government sources</p> <ul style="list-style-type: none"> • Transparency International (2016): Transparency Internationals Corruption Perceptions Index 2016: https://www.transparency.org/news/feature/corruption_perceptions_index_2016 • World Bank (2016): Worldwide Governance Indicators 2014: http://info.worldbank.org/governance/wgi/index.aspx#reports • Personal communication 17 - – Professor, Istanbul University, Faculty of Forestry. Department of Forestry and Environmental Law 	<p>Overview of Legal Requirements</p> <p>Article 27 of the Forest Code states that GDF has an authority to deal with how to prepare a transport document and the information in it.</p> <p>According to article 41 of Forest Code, all sold forest products, as well as timber, should be transported only after having been paid its selling price. Logs shall be sealed and marked and followed by a transport license. In the transport license, the quantity, species, quality, volumes, monetary values, transporting date, time and distance for arrival are to be declared. All information (volume, length, price etc.) is applied on each log and entered into the “irsalye” document. By law it is illegal to transport any woods without payment bill or sales document issued by the local forestry district.</p> <p>The transportation license is issued by the Chief forester. The license plate of the truck is also put in the license, start and arrival point (e.g. storage house). If the arrival point is changed, the chief forester will need to change the license or issue a new license. If unloaded and the wood are to be transported at a later stage to another location, the chief forester needs to issue a new license. Thus, raw material shall always be followed by a transportation license and be sealed. Logs will be sealed with a black seal and sawn wood by a red seal (articles 20, 24, 25, 32 of Regulation on issuing transportation license of forest products).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://www.ogm.gov.tr/ekutup-hane/Yonetmelikler/Orman%20Ürünlerine%20Verilecek%20Tezkerelere%20Ait%20Yönetmelik.pdf</p> <ul style="list-style-type: none"> Regulation on the Means and Methods of Selling Forest Products (Orman Ürünlerinin Satış Usul ve Esasları Hakkında Yönetmelik) enacted based on Forest Code of 6831, Published in Official Gazette 20/3/2015 No: 29301. https://www.ogm.gov.tr/ekutup-hane/Yonetmelikler/Orman%20Ürünlerinin%20Sat%C4%B1%C5%9F%20Usul%20ve%20Esaslar%C4%B1%20Hakk%C4%B1nda%20Y%C3%B6netmelik.pdf Order of GDF, No. 6877/A, Standing Tree Selling Guideline (Dikili Ağaç Satış Esasları), https://www.ogm.gov.tr/ekutup-hane/Tamimler/6877A%20say%C4%B1%C4%B1%20Dikili%20Sat%C4%B1%C5%9F%20Tamimi%20EK-1%20%C4%B0%C5%9Flenmi%C5%9F%201.pdf 		<p>When the actual timber load exceeds with respect to volume and quantity, the above limits, all extra timber loads are considered as illegal and the owner is imposed a fine. The forest rangers may control transportation on forest roads, and police and gendarme on country roads.</p> <p>Description of risk In order to avoid tax, timber can be transported directly from the forest to the production factory without being registered. Such practices have been said to be highly uncommon (personal communication 12, 17), but there is no written evidence to verify this statement.</p> <p>According to Annual Activity Report of GDF, 2015, 708 cases and 949 m3 of timber has been reported as being unlawfully classified and/or not having legal transport license- This is 0,004% of the total harvested volume of 21.600.583m3 (industrial wood: 16.637.597 m3 and firewood: 5.022.986 m3) (GDF Annual Activity Report, 2015). The annual activity report does not clarify whether the reported cases relate to industrial wood or firewood. This is a miniscule proportion of the total volume. Even though there are some evidence that logs are not marked as required (personal communication 12), and the numbers referred to above does not constitute evidence that more timber is not illegally traded and transported, it does indicate that the numbers are low. No further information provided indications of illegal transport and trade being an issue in relation to commercial timber. This was finding was also confirmed through personal communication 17.</p> <p>As there is a risk that illegally logged firewood is sold at the commercial market (see indicator 1.4), there is reason to believe that this timber is sold without proper documentation. Firewood can come from all forests in the country, public, state and private forests. Therefore, based on precautionary approach, the risk for this indicator is considered specified.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Forestry (GDF), www.ogm.gov.tr <p>Legally required documents or records</p> <ul style="list-style-type: none"> Transport License issued by Local Forestry District 		<p>Risk conclusion Specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
1.18 Offshore trading and transfer pricing	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> The Corporate Income Tax Law, article 13 (the CITL) No. 5520 with the title 'Disguised Profit Distribution through Transfer Pricing' <p>Legal Authority</p> <ul style="list-style-type: none"> Tax Audit Board at the Turkish Ministry of Finance 	<p>Government sources</p> <ul style="list-style-type: none"> Personal communication 13 – member of forestry sector of Istanbul Chamber of Commerce Turkish Official Statistics Department, Export statistics of forestry for 2015, https://www.ogm.gov.tr/ekutuphane/Istatistikler/Ormancilik%20Istatistikleri/Ormancilik%20Istatistikleri%202015.rar <p>Non-Government sources</p> <ul style="list-style-type: none"> PWC (2015): International Transfer Pricing 2015/16. Turkey. Pp. 993-1006. Can be downloaded at: http://www.pwc.com/gx/en/services/tax/transfer-pricing/itp-download.html Torid - Turkiye Ormancilar İhracatçılar Derneği – Turkish Association of Forest Product Export 	<p>Overview of Legal Requirements Specific Transfer Pricing rules have been valid in Turkey as of 1 January 2007 under the Corporate Income Tax Law (No. 5520, article 13). The arm's-length principle is implemented in the legislation in line with the OECD Guidelines and Article 9 of the OECD Model Tax Convention (PWC, 2015).</p> <p>Description of risk Transfer pricing audits are conducted by the Turkish Tax Authorities, who has set up special transfer pricing divisions. Audits related to transfer pricing has increased in recent years. Tax Audit Board has focused on the following transfer pricing issues:</p> <ul style="list-style-type: none"> Continuous losses in previous years by companies that operate primarily through related companies abroad. Management fees and indirect cost allocations. Royalty payments. Intragroup financing. Intragroup services. Year-end adjustments.

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legally required documents or records</p> <ul style="list-style-type: none"> Documents are to be submitted to the tax authorities, but none are to be publicly available. 	<ul style="list-style-type: none"> Personal communication 14 – Forest engineer and economist, Istanbul University FAO Country Report of Turkey, (2015) http://www.fao.org/faostat/en/#data/FO 	<ul style="list-style-type: none"> Arm's lengthness of incurred profit margins (PWC 2015). <p>Timber produced in Turkey is mainly from State Forests and the income from the timber sale goes to the state. Farm land plantations are relatively small, and so are the amount of timber and income generated, which also means that the incentive to engage in transfer pricing is low. Furthermore, the majority of timber is used domestically as input material for processing. Thus, there is a low level of export of rough wood. (Turkish Official Statistics Department and FAO, 2015)</p> <p>There are no indications of a transfer pricing being an issue within the sale of raw timber for neither privately nor state owned forests.</p> <p>Risk conclusion Low risk. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>
1.19 Custom regulations	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Law on Custom of 1999, No: 4458, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.4458.pdf Decision Number 2016, No. 9645. Custom Declaration Statistical Position. 30.12.2016-29934 (2.M.) Official Gazette. Effective: 01.01.2017. http://www.orgtr.org/tr/44-fasil 	<p>Government sources</p> <ul style="list-style-type: none"> Ministry of Customs and Trade (GTB), 2015, Annual Activity Report, http://egitim.gtb.gov.tr/faaliyet-raporlari/2015-yili-faaliyet-raporu Personal communication 3 – Director, Istanbul Regional Forestry District <p>Non-Government sources</p> <ul style="list-style-type: none"> FAOstat (N.Y): Compare data: Forestry. Forestry Production and Trade. Turkey. Search criteria: Export Quality. Roundwood+(Total. Sawnwood+(Total): http://www.fao.org/faostat/en/#compare World Bank (2016): Worldwide Governance Indicators 2014: 	<p>Overview of Legal Requirements</p> <p>According to article 1 of the Custom Law, No: 4458, all goods and vehicles that enter into custom zone of the country and that exit from the custom zone of the country are subject to the provisions of this law. Export will be allowed only with an export permit and custom declaration. Wood for export shall be classified according to Decision Number: 2016/9645, which is based on HS custom classification number. Volume shall be registered in m3 (Decision Number: 2016/9645)</p> <p>There is no export ban on timber from Turkey and no export tax required.</p> <p>Description of risk Turkey only exports a small amount of round wood (437 m3 in 2014) and sawn wood (24992 m3 in 2014) (FAOStat (N.Y)), as the majority is used for domestic secondary processing (personal communication 3 and 15). The incentive to commit fraud within custom is small as there are no export</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legal Authority</p> <ul style="list-style-type: none"> General Directorate of Custom Security, http://muhafaza.gtb.gov.tr/ <p>Legally required documents or records</p> <ul style="list-style-type: none"> Export permit Customs Declaration (Bill of entry) This document covers the quality, quantity and price of the products. Receipt (bill) Bill of lading (consignment note) ("Konismento") Packing list (certificate of weight) Quarantine certificate 	<p>http://info.worldbank.org/governance/wgi/index.aspx#reports</p> <ul style="list-style-type: none"> Personal communication 14 – Forest Engineer and Economist, Istanbul University Personal communication 15 – Forest engineer, TORID – Turkish Forest Products Export Association 	<p>restrictions or tax to be paid. There is no indication of timber being exported illegally (personal communication 3, 14 and 15).</p> <p>Risk conclusion Low risk. Threshold (1) is met: Identified laws are upheld. Cases where laws/ regulations are violated are efficiently followed up via preventive actions are taken by the authorities and/or by the relevant entities.</p>
1.20 CITES	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Law on National Parks of 1983, No: 2873, 	<p>Government sources</p> <ul style="list-style-type: none"> GDF CITES Documents. https://www.ogm.gov.tr/ekutuphane/CITES/Forms/AllItems.aspx 	<p>Overview of Legal Requirements By law CITES species shall be controlled in both export and import and be followed by a CITES permit.</p> <p>Description of risk</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>http://www.mevzuat.gov.tr/MevzuatMetin/1.5.2873.pdf</p> <ul style="list-style-type: none"> • Law on Veterinary Services, Plant Health, Food and Forage of 2010, No: 5996, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.5996.pdf • CITES Regulation of 2001, Published in Official Gazette, of 27.12.2201, No: 24623, www.mevzuat.gov.tr <p>Legal Authority</p> <ul style="list-style-type: none"> • General Directorate of Forestry (GDF), www.ogm.gov.tr • General Directorate of Nature Protection and National Parks <p>Legally required documents or records</p> <ul style="list-style-type: none"> • CITES Permit 	<ul style="list-style-type: none"> • CITES ORDER, https://www.ogm.gov.tr/ekutuphane/CITES/04-CITES%20Kapsam%C4%B1ndaki%20Orman%20%C3%9Cr%C3%BCnleri%20T%C3%BCreri.pdf • GDF, What is CITES https://www.ogm.gov.tr/ekutuphane/CITES/00-CITES%20Nedir.pdf • Regulation on CITES Species, http://www.resmigazete.gov.tr/eskiler/2005/06/20050616-8.htm <p>Non-Government sources</p> <ul style="list-style-type: none"> • CITES Checklist (N.Y): Checklist of CITES Species [Online]. Available at: www.checklist.cites.org. [Accessed 24 November 2016] 	<p>There are no tree species in Turkey that are on the CITES list, and thus there is no risk of violating the requirements of CITES for wood exports.</p> <p>Risk conclusion Low risk. Threshold (1) is met: Identified laws are upheld. Cases where laws/ regulations are violated are efficiently followed up via preventive actions are taken by the authorities and/or by the relevant entities.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
Diligence/due care procedures			
1.21 Legislation requiring due diligence/ due care procedures	<p>Applicable laws and regulations</p> <p>Not applicable. There are no applicable laws and regulations requiring due diligence system/ due care procedures in Turkey.</p> <p>Legal Authority</p> <p>N/A</p> <p>Legally required documents or records</p> <p>N/A</p>	N/A	N/A

Recommended control measures

The recommended control measures here are only indicative in nature, and are not mandatory. Organizations shall evaluate and devise appropriate control measures to mitigate the risks identified in this risk assessment as applicable.

Indicator	Recommended control measures
1.1 Land tenure and management rights	<p>Generic</p> <ul style="list-style-type: none"> • Land registry shall confirm ownership and validity of property deed. • Tax authorities shall confirm valid tax registration. • The business register shall confirm valid business licenses to operate within the jurisdiction. • Stakeholder consultation shall confirm that legal status of the operation or rights for conducting the established activities are not subject to court orders or other legally established decisions to cease operations. • The management contract or other agreements with the owner shall indicate clear management rights. • Valid business registration documents shall exist. • Inspections of harvesting site shall confirm that harvesting takes place within property limits (including felling, transport and log landings).

Indicator	Recommended control measures
	Country Specific <ul style="list-style-type: none"> • Land title shall confirm land right • Land registry confirms ownership of private forests. • Maps of forest area can be obtained at the GDF • Timber harvesting documents are available in both forestry departments and contractors.
1.2 Concession licenses	N/A
1.3 Management and harvesting planning	<ul style="list-style-type: none"> • Maps showing harvesting areas (in compliance with the harvesting plan) • Document review: approved harvesting plan and management plan • Field visits to verify that the contractors have a Timber Extraction Contract • Approved forest management plans shall exist for the FMU where the harvesting is taking place. • Forest management plans shall contain all legally required information and procedures. • Annual operating or harvesting plans shall be in place and approved by legally competent authorities. • Annual operating or harvesting plans shall contain information and procedures, according to all legal requirements. • The contents of the operating and harvesting plans shall be consistent with approved forest management plans. • Plans for carrying out harvesting operations shall be subject to public disclosure and objections prior to commencement if legally required. • Harvesting restrictions shall be identified in management plan and maps if legally required. • Harvesting inventories shall be conducted according to legal requirements. • Field verifications shall indicate that the contents of the harvesting plans are adhered to in the field. • Stakeholder consultation shall indicate that the forest management plan has been approved according to legally prescribed process
1.4 Harvesting permits	Generic <ul style="list-style-type: none"> • Harvesting permits (license or similar legal document governing the harvesting of forest resources) shall exist. • Harvesting limits shall be clearly defined based on maps and quantities. • Authorities shall confirm the validity of harvesting permit. • Stakeholder consultation shall confirm that harvesting permit has been issued according to the relevant laws and regulations by the legally designated competent authority. • Field inspection shall confirm that harvesting takes place within limits given in the harvesting permit. • Field inspection shall confirm that information regarding area, species, volumes and other information given in the harvesting permit are correct and within limits prescribed in the legislation Country Specific <ul style="list-style-type: none"> • Ask the relevant Forest Village Development Cooperative about information of harvesting statistics, volume, species (only for state forest) • Interview with the forest villagers
1.5 Payment of royalties and harvesting fees	<ul style="list-style-type: none"> • Receipts shall exist for payments of harvesting related royalties, taxes, harvesting fees and other charges. • Volumes, species and qualities given in sales and transport documents shall match the paid fees. • Classification of species, volumes and qualities shall match the royalties and fees paid

Indicator	Recommended control measures
1.6 Value added taxes and other sales taxes	<p>Generic</p> <ul style="list-style-type: none"> • Sales documents shall include applicable sales taxes. • Receipts for payment sales taxes shall exist. • Volumes, species and qualities given in sales and transport documents shall match the fees paid. • Sales prices shall be in line with market prices. • Harvested species, volume and qualities shall match the sales documents. • Authorities shall confirm that operation is up to date in payment of applicable sales taxes. • Consultation with financial authority to verify that all required income and profit taxes have been paid <p>Country specific</p> <ul style="list-style-type: none"> • Ask to see the written sales contract from the farm land plantation owner or the buyer •
1.7 Income and profit taxes	<ul style="list-style-type: none"> • Consultation with financial authority to verify that all required income and profit taxes have been paid Ask to see the written contract from the owner/contractor.
1.8 Timber harvesting regulations	<p>Generic</p> <ul style="list-style-type: none"> • Harvesting shall be conducted within the authorized boundaries of the FMU. • Harvesting shall not take place in areas where harvesting is legally prohibited. • Tree species or selected trees found within the FMU for which felling is prohibited shall be listed in operational plans. • Harvesting restrictions shall be observed in the field. • Tree species or selected trees found within the FMU for which felling is prohibited shall be marked in the field <p>Country Specific</p> <ul style="list-style-type: none"> • Site inspection • Training records of chief forester and people working in the forest (Training Certificate of Chief Foresters) • Look into whether it is possible to source wood from a FSC certified area (Kirkilareli Province)
1.9 Protected sites and species	<p>Generic</p> <ul style="list-style-type: none"> • All legally protected areas (including species habitats) shall be included in the management plan or related documentation if required by the legislation. • Legal established procedures for surveying, managing and protecting endangered or threatened species within the management unit shall be followed. • Nature protection regulations such as protected areas, set-aside areas, protected species and hunting
1.10 Environmental requirements	<p>Generic</p> <ul style="list-style-type: none"> • • Requirements for environmental monitoring shall be observed. • Environmental restrictions shall be followed in the field, such as requirements related to soil damage, retention trees, seasonal restrictions etc. <p>Country Specific</p> <ul style="list-style-type: none"> • Onsite audit to verify environmental requirements are in place. • Look into whether it is possible to source wood from a FSC certified area (Kirkilareli Province)
1.11 Health and safety	<p>Generic</p> <ul style="list-style-type: none"> • All safety and health regulations shall be followed and all required safety equipment shall be used.

Indicator	Recommended control measures
	<ul style="list-style-type: none"> • Occupational health and safety requirements shall be observed by all personnel involved in harvesting activities. • Interviews with staff and contractors shall confirm that legally required protection equipment is required/provided by the organization. • All requirements on prevention of air and water pollution shall be followed and are verified through reports monitoring pollution (when applicable) <p>Country Specific</p> <ul style="list-style-type: none"> • Training document stating that the worker has received training in health and safety • Request copy of harvesting file, where the list of workers and the document with signature to show that safety equipment is being provided and used.
1.12 Legal employment	<p>Generic</p> <ul style="list-style-type: none"> • All workers are employed according to the regulation and required contracts are in place • Persons involved in harvesting activities shall be covered by obligatory insurances. • Persons involved in harvesting activities shall hold required certificates of competence for the function they carry out. • At least the legally established minimum salaries shall be paid for personnel involved in harvesting activities. • Minimum age shall be observed for all personnel involved in harvesting activities. • Minimum age shall be observed for all personnel involved in hazardous work. • Stakeholders shall confirm that forced or compulsory labour is not involved in harvesting activities. <p>Country Specific</p> <ul style="list-style-type: none"> • Compare Health and Safety document (signed by all workers) with list of registered workers in the social security database • Request NGO to do control/survey (unofficial control), e.g. Rural environment and forestry foundation (KIRÇEV- KIRSAL) on whether the legal requirements are complied with in relation to legal employment • Ask Labour Union to do control/survey
1.13 Customary rights	<ul style="list-style-type: none"> • Stakeholder consultation shall confirm that customary rights are observed during harvesting activities.
1.14 Free prior and informed consent	N/A
1.15 Indigenous peoples rights	N/A
1.16 Classification of species, quantities, qualities	<ul style="list-style-type: none"> • Products shall be correctly classified (species, quantities, qualities etc.) on sales documents, custom declarations and other legally required documents • Evidence shall be provided upon request (photographs of labelling) • Physical control where it should be verified that the present material equals what has been invoices and mark marked
1.17 Trade and transport	<ul style="list-style-type: none"> • Requirements related to transport means (e.g. trucks) shall always be followed • Species and product types shall be traded legally. • Required trade permits shall exist and be documented. • All required transport documents shall exist and be documented. • Volume, species and qualities shall be classified according to legal requirements. • Documents related to transportation, trade or export shall be clearly linked to the specific material in question
1.18 Offshore trading and transfer pricing	N/A
1.19 Custom regulations	N/A

Indicator	Recommended control measures
1.20 CITES	N/A
1.21 Legislation requiring due diligence/due care procedures	N/A

Controlled wood category 2: Wood harvested in violation of traditional and human rights

Risk assessment

Indicator	Sources of Information	Functional scale	Risk designation and determination
2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.	See detailed analysis below.	Country	<p>Low risk</p> <p>Justification: All low risk thresholds (1, 2, 3, 4 and 5) are met. None of the specified risk thresholds are met.</p>
2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.	See detailed analysis below.	Country	<p>Specified risk on violation of freedom of association and right to collective bargaining and on gender wage discrimination.</p> <p>Justification: Specified risk threshold 15 applies for these aspects.</p> <p>Low risk on child labour, forced labour and other forms of discrimination.</p> <p>Justification: Low risk threshold 10 applies for these aspects.</p>
2.3. The rights of Indigenous and Traditional Peoples are upheld.	See detailed analysis below.	<p>South-East Turkey</p> <p>Rest of the country</p>	<p>Specified risk</p> <p>Justification: Specified risk threshold 23 is met.</p> <p>Low risk</p> <p>Justification: Low risk thresholds 16 and 21 are met.</p>

Recommended control measures

The recommended control measures here are only indicative in nature, and are not mandatory. Organizations shall evaluate and devise appropriate control measures to mitigate the risks identified in this risk assessment as applicable.

Indicator	Recommended control measures
2.1	N/A
2.2	CM should be based on clear evidence that the Organization has policies in place that guarantee core labour rights
2.3	<p>Clear and unchallenged evidence that a forest operation is not taking place in traditional territories of indigenous or traditional peoples. Any evidence of any challenge by any IP/TP, their representatives or any other CSO or NGO immediately means that the forest operation included specified risk of violating IP/TP rights Or,</p> <p>Clear and unchallenged evidence that the FMU is managed by the governance structures of indigenous or traditional peoples, Or,</p> <p>Clear and unchallenged evidence that the involved indigenous or traditional peoples have freely ceded their territorial and/or use rights in an agreement or settlement with the government, And</p> <p>An (FPIC) agreement with the involved indigenous or traditional peoples with customary forest rights in the forest management unit, after a fair, transparent, cultural appropriate and inclusive procedure.</p>

Detailed analysis

Sources of information	Evidence	Scale of risk assessment	Risk indication ²
<p>Context (the following are indicators that help to contextualize the information from other sources)</p> <ul style="list-style-type: none"> Searching for data on: level of corruption, governance, lawlessness, fragility of the State, freedom of journalism, freedom of speech, peace, human rights, armed or violent conflicts by or in the country, etc. 			
World Bank: Worldwide Governance Indicators - the WGI report aggregate and individual governance indicators for 215 countries, for six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption http://info.worldbank.org/governance/wgi/index.aspx#home	http://info.worldbank.org/governance/wgi/index.aspx#reports (click on table view tab and select Country) In 2015 (latest available year) Turkey scores between 55.29 (Rule of Law) and 64.42 (Regulatory Quality) on the percentile rank among all countries for four of the six dimensions. The other dimension score 9.52 (Political Stability and absence of Violence/Terrorism) and 35.47 (Voice and Accountability) (the scores range from 0 (lowest rank) to 100 (highest rank) with higher values corresponding to better outcomes).	Country	

² A risk indication is provided for each source analyzed, except in the first part that addresses the general country context as that is not a risk indicator. A cumulative risk assessment for each risk indicator is provided in the row with the conclusion on each risk indicator, based on all the sources analyzed and evidence found.

World Bank Harmonized List of Fragile Situations	http://www.worldbank.org/en/topic/fragilityconflictviolence/brief/harmonized-list-of-fragile-situations Turkey does not feature in this list.	Country	
Committee to Protect Journalists: Impunity Index CPJ's Impunity Index calculates the number of unsolved journalist murders as a percentage of each country's population. For this index, CPJ examined journalist murders that occurred between September 1, 2006, and August 31, 2016, and that remain unsolved. Only those nations with five or more unsolved cases are included on this index.	https://www.cpj.org/reports/2016/10/impunity-index-getting-away-with-murder-killed-justice.php Turkey does not feature in this list.	Country	
Carleton University: Country Indicators for Foreign Policy: the Failed and Fragile States project of Carleton University examines state fragility using a combination of structural data and current event monitoring.	http://www4.carleton.ca/cifp/app/ffs_ranking.php Turkey scores 'medium' for 10 out of 11 indicators and 'low' on 1 indicator on the State fragility map 2012 (latest available year).	Country	
Human Rights Watch: http://www.hrw.org	https://www.hrw.org/world-report/2016 World Report 2016 "Some 4 million Syrian refugees initially fled to neighboring countries, including more than 2 million to Turkey (...)" Chapter on Turkey (pages 578-585) "The environment for human rights in Turkey deteriorated in 2015 with the breakdown of the Kurdish peace process, a sharp escalation of violence in the southeast, and a crackdown on media and political opponents of the ruling Justice and Development Party (AKP). Turkey continued to host large number of refugees, asylum seekers, and migrants, primarily from Syria but also from Afghanistan, Iraq, and other countries. The number from Syria surged in 2015, bringing the total to 2.2 million. Conditions and rights protections for refugees, asylum seekers and migrants remain uneven at best, including in relation to education and employment. " Renewed Violence in the Southeast "The breakdown in 2015 of the government-initiated peace process with Abdullah Öcalan, the imprisoned leader of the armed Kurdistan Workers' Party (PKK), was accompanied by an increase in violent attacks, armed clashes, and human rights abuses in the second half of the year. The latter included violations of the right to life, arrests of non-violent protesters and activists on terrorism charges, and ill-treatment of detainees. Hundreds of attacks on HDP offices took place in the run-up to both elections, and two of its offices were bombed in the run-up to the June election. A bomb attack on a Diyarbakır HDP election rally on June 5 killed four. A former ISIS fighter is under investigation for the Diyarbakır bombing."	Country	

	<p>Freedom of Expression, Association, and Assembly</p> <p>“Government-led restrictions on media freedom and freedom of expression in Turkey in 2015 went hand-in-hand with efforts to discredit the political opposition and prevent scrutiny of government policies in the run-up to the two general elections.</p> <p>(..)</p> <p>Journalists continued to be fired from mainstream press outlets in 2015 for critical reporting, commentary, and tweets. Social media postings critical of the president and politicians by ordinary people also led to criminal defamation charges and convictions. A new trend in 2015 saw courts in several cases order pretrial detention of people for several months for allegedly insulting Erdoğan via social media or during demonstrations. Three foreign journalists were deported in 2015 for their news reporting activities in the southeast, and a fourth, Mohammed Rasool, was in pretrial detention facing investigation on terrorism charges at time of writing.</p> <p>In the first six months of 2015, Turkish authorities were responsible for almost three quarters of requests to Twitter worldwide for removal of tweets and blocking of accounts. In March, parliament passed new legislation allowing ministers to request the Communications Directorate (TİB) to block online content or remove it within four hours to “protect life and property, national security, the public order, [or] to prevent crime and to protect general health.” A court must approve the decision within 48 hours.</p> <p>The authorities frequently impose arbitrary bans on public assemblies and violently disperse peaceful demonstrations, in some cases using powers conferred by a new domestic security law passed in March. For the first time ever, the Istanbul governor’s office banned the annual Istanbul Gay Pride march in June 2015, citing vague concerns about counter-demonstrations. Police dispersed groups who had assembled peacefully using tear gas and water cannons. “</p> <p>Judicial Independence</p> <p>“Long-standing defects in Turkey’s justice system include threats to judicial independence, a pattern of ineffective investigation into abuses by security forces and other state actors, excessively long proceedings, and politically motivated prosecutions.</p> <p>The AKP government in 2015 continued efforts to purge the police and judiciary of alleged supporters of the Gülen movement. During 2015, prosecutors, judges, and police officers with perceived links to the Gülen movement were jailed and charged with plotting against the government and membership of a terrorist organization. The main evidence being cited against judges and prosecutors at time of writing was decisions taken in the course of their professional duties rather than any evidence of criminal activity.”</p>		
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	<p>Refugees and Migrants</p> <p>“As of October 2015, according to official estimates, Turkey hosted 2.2 million refugees from Syria, 250,000 of them in camps, as well as more than 80,000 asylum seekers and refugees from other countries, notably Afghanistan and Iraq.</p> <p>While Turkey has been generous in hosting large numbers of Syrian refugees, the government only grants Syrians temporary protection rather than refugee status, while other nationalities of asylum seekers do not receive that. Turkish government schools are officially available to all Syrian primary and secondary school-age students registered for “temporary protection,” but at time of writing more than 400,000 children—over two-thirds of all Syrian children in Turkey—were receiving no form of education. Child labor is rampant among the Syrian refugee population as well as among other refugee groups in Turkey. Syrians and other refugees and asylum seekers are not legally allowed to work.”</p> <p>https://www.hrw.org/report/2016/12/15/silencing-turkeys-media/governments-deepening-assault-critical-journalism</p> <p>DECEMBER 15, 2016 <i>Silencing Turkey’s Media</i> <i>The Government’s Deepening Assault on Critical Journalism</i></p> <p>“Summary</p> <p>On the night of July 15, 2016, elements of the Turkish military staged an attempt to overthrow the democratically elected government. According to official figures, at least 241 citizens and security personnel were killed, and over 2,000 more injured during the clashes in the capital Ankara and Istanbul.</p> <p>On July 21, President Recep Tayyip Erdoğan declared a three-month state of emergency that has since been extended until January 2017 and might be prolonged again. It gives the president and government the power to rule by decree, bypassing parliament and the potential to challenge decrees via Turkey’s Constitutional Court. In one such emergency decree, issued on July 27, 2016, the government ordered the closure of 131 media outlets, including 45 newspapers, 16 TV channels, three news agencies, 23 radio stations, 15 magazines and 29 publishing houses with alleged ties to the movement of US-based Islamic cleric Fethullah Gülen whom the government accuses of masterminding the failed coup attempt.</p> <p>On September 28, 2016, Turkish authorities used the same emergency decree to order the shut-down of 23 TV and radio stations popular among Kurds, Alevi and supporters of opposition parties; and on October 31, 2016, police detained 12 journalists and managers from one of the last remaining independent newspapers, Cumhuriyet. Ten were later formally arrested.</p>	Country	
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	<p>By December 2016, 140 media outlets and 29 publishing houses had been shut down via emergency decree, leaving more than 2,500 media workers and journalists unemployed. Hundreds of government-issued press accreditations have been cancelled and without accreditation journalistic activity in Turkey can be impeded. An unknown number of journalists had their passports revoked, thus banning them from all foreign travel.</p> <p>Arrest warrants have been issued for more than 100 journalists, and, according to P24, an independent journalism platform, 149 journalists and media workers now languish in Turkish jails – all but 18 of them in pretrial detention pending trial – making Turkey once again the world leader in locking up journalists. Among these are several well-known writers and columnists, including Şahin Alpay, Nazlı Ilıcak, Ahmet and Mehmet Altan, Ali Bulaç, Aslı Erdoğan, Kadri Gürsel, Necmiye Alpay and the editor-in-chief of the opposition daily Cumhuriyet, Murat Sabuncu.</p> <p>The attacks on independent media after the attempted coup was defeated in July marked an intensification of a crackdown on media freedom that had already been going on for over a year. Censorship of journalism has been going on for much longer. The authorities use ever more creative ways to silence serious reporting and news coverage that President Recep Tayyip Erdoğan and the Justice and Development Party government disagree with.</p> <p>Five trends stand out: first the use of the criminal justice system to prosecute journalists for terrorism, insulting public officials, or crimes against the state; second, threats and physical attacks on journalists and media outlets; third, government interference with editorial independence and pressure on media organizations to fire critical journalists; fourth, the government takeover or closure of private media companies; and fifth, fines, restrictions on distribution and closure of critical television stations. A sixth trend, the blocking of online news websites or internet access in general, is not discussed in this report. The large number of restrictions Turkey places on internet freedom constitutes an area of study in its own right.”</p>		
<p>US AID: www.usaid.gov Search on website for [country] + ‘human rights’</p>	<p>https://www.usaid.gov/gsearch/Turkey%2Bhuman%2Brights?page=1</p> <p>Website contains information on refugees similar to Human Rights Watch and Amnesty International.</p>	Country	
<p>Global Witness: www.globalwitness.org Search on website for [country] + ‘human rights’</p>	<p>https://www.globalwitness.org/en/archive/illegal-logs-liberia-found-french-port-sweeping-criminal-sanctions-kick-across-eu/ Press Release / March 3, 2013 ILLEGAL LOGS FROM LIBERIA FOUND IN FRENCH PORT AS SWEEPING CRIMINAL SANCTIONS KICK IN ACROSS EU “Illegal Liberian timber worth thousands of Euros was sitting in a French port less than 3 weeks before a new EU law prohibiting the import of illegal timber</p>	Country	

	<p>came into force, Global Witness revealed today. Under the EU Timber Regulation, which took effect yesterday, the import of illegal timber is prohibited and could land the importer with up to two years imprisonment or a 50,000 Euro fine.”</p> <p>“Global Witness has documented the trail of illegal Private Use Permit timber from Liberia to China, India, Turkey, Russia and United Arab Emirates, in addition to France. Under the new law, any company importing timber into the EU is now required to carry out thorough background checks to ensure that the timber was logged according to the producer country’s laws. In high-risk countries where the rule of law is weak, which is the case in most tropical forested countries, companies will need to be aware of the details of each logging licence under which timber is cut and take measures to verify that all relevant laws are being followed.”</p>		
<p>WWF http://wwf.panda.org/about_our_earth/about_forests/deforestation/forest_illegal_logging/</p>	<p>http://wwf.panda.org/about_our_earth/about_freshwater/rivers/euphrates/index.cfm (Viewed in November 2016)</p> <p><i>Euphrates</i> Current threats “As with the Tigris there is much controversy over rights and use of the river. This has resulted in a struggle between the governments of Turkey, Syria, and Iraq to use as much water as possible. This issue has the potential to ingite a military conflict.</p> <p>Although dams can now divert all of the flow of these rivers, 20 more dams are under construction. In the meantime, the Mesopotamian Marshes — which once covered an area nearly half the size of Switzerland and were central to the livelihoods of the half a million Ma'dan or Marsh Arab people — have been all but destroyed. Conserving freshwater ecosystems through better management would not only help maintain the amount of water available, but also its quality.”</p>	The watersheds of Euphrates and Tigris in Eastern and Southeastern Turkey	
<p>Chatham House Illegal Logging Indicators Country Report Card http://indicators.chathamhouse.org/explore-the-data</p>	No information on illegal logging in Turkey found.	Country	
<p>Transparency International Corruption Perceptions Index</p>	<p>https://www.transparency.org/news/feature/corruption_perceptions_index_2016 Turkey scores 41 points on the Corruption Perceptions Index 2016 on a scale</p>	Country	

	<p>from 0 (highly corrupt) to 100 (very clean). Turkey ranks 75 out of 176 with rank no. 1 being the cleanest country.</p>		
<p>Amnesty International Annual Report: The state of the world's human rights -information on key human rights issues, including: freedom of expression; international justice; corporate accountability; the death penalty; and reproductive rights</p>	<p>https://www.amnesty.org/en/latest/research/2016/02/annual-report-201516/ <i>State of the Human Rights Report 2015/16</i></p> <p>EUROPE AND CENTRAL ASIA REGIONAL OVERVIEW (page 41) “2015 was a turbulent year in the Europe and Central Asia region, and a bad one for human rights. It opened with fierce fighting in eastern Ukraine and ended with heavy clashes in eastern Turkey. (...) Against this backdrop, respect for human rights regressed across the region. In Turkey and across the former Soviet Union, leaders increasingly abandoned respect of human rights altogether, as they strengthened their control of the media and further targeted their critics and opponents.”</p> <p><i>Chapter on Turkey (pages 369-373)</i> <i>(Summarizing introduction)</i> “The human rights situation deteriorated markedly following parliamentary elections in June and the outbreak of violence between the Kurdistan Workers’ Party (PKK) and the Turkish armed forces in July. The media faced unprecedented pressure from the government; free expression online and offline suffered significantly. The right to freedom of peaceful assembly continued to be violated. Cases of excessive use of force by police and ill-treatment in detention increased. Impunity for human rights abuses persisted. The independence of the judiciary was further eroded. Separate suicide bombings attributed to the armed group Islamic State (IS) targeting left-wing and pro-Kurdish activists and demonstrators killed 139 people. An estimated 2.5 million refugees and asylum-seekers were accommodated in Turkey but individuals increasingly faced arbitrary detention and deportation as the government negotiated a migration deal with the EU.”</p> <p>FREEDOM OF EXPRESSION “Respect for freedom of expression deteriorated. Countless unfair criminal prosecutions, including under criminal defamation and anti-terrorism laws, targeted political activists, journalists and others critical of public officials or government policy. Ordinary citizens were frequently brought before the courts for social media posts. The government exerted immense pressure on the media, targeting media companies and digital distribution networks, and singling out critical journalists, who were then threatened and physically attacked by often unidentified assailants. Mainstream journalists were fired after criticizing the government. News websites, including large swathes of the Kurdish press, were blocked on unclear grounds by administrative orders aided by a compliant judiciary. Journalists were harassed and assaulted by police while covering stories in the predominantly Kurdish southeast. “</p>	<p>Country</p>	

FREEDOM OF ASSEMBLY

“The right to peaceful assembly continued to be limited in law and denied in practice, depending on the issue being protested and participants’ profiles. The practice of arbitrary detentions at assemblies was given legal basis by legislative amendments in March in the Domestic Security Package, providing police with powers to detain without judicial supervision. Peaceful demonstrators continued to be prosecuted and convicted. “

TORTURE AND OTHER ILL-TREATMENT

“Reported cases of ill-treatment in detention and other inhuman or degrading treatment in the context of police or military operations against the PKK increased. Four men accused of murdering two policemen in the southeastern city of Ceylanpınar said they had been severely beaten in police custody in July and August, first when they were being transferred to Osmaniye No. 1 T-type prison in Adana province and then at the prison itself. They remained in pre-trial detention at the end of the year. Images circulated on the internet, apparently taken by special operations police officers, appearing to show the naked and disfigured body of female PKK member Kevser Eltürk (Ekin Wan) being paraded in the streets of Varto in the eastern province of Muş, after clashes with state forces in August. Another photograph showed the body of Hacı Lokman Birlik being dragged behind an armoured police vehicle in the southeastern province of Şırnak in October. The reported autopsy indicated that the man had been shot 28 times. The authorities said that investigations into both incidents were continuing”

IMPUNITY

“Impunity persisted for human rights abuses committed by public officials. Investigations were hampered by police withholding crucial evidence, such as lists of officers on duty and CCTV footage, and the passivity of prosecutors faced with this obstructiveness. Without a long-promised Independent Police Complaints Commission, there was little prospect of improvement. Where they took place, prosecutions were often flawed. There was a resounding failure to secure accountability for police abuses during the 2013 Gezi Park protests. In January, police officers and civilians were convicted for their part in the beating to death of protester Ali İsmail Korkmaz in the city of Eskişehir. “

REFUGEES AND ASYLUM-SEEKERS

“Around 2.3 million registered Syrian refugees and 250,000 refugees and asylum-seekers from other countries including Afghanistan and Iraq were accommodated in Turkey. Some 260,000 Syrian refugees were accommodated in well-resourced, government-run camps, but most refugees and asylum-seekers outside camps received little or no assistance and were

	not granted the right to work. In many cases they struggled to survive, getting by through exploitative and underpaid irregular work and the charity of neighbours. Asylum applications for non-Syrians were rarely processed in practice. The government signed an agreement with the EU in October, aimed at preventing irregular migration from Turkey to the EU. In September, at least 200 refugees – mostly Syrian – attempting to travel irregularly to Greece were kept in incommunicado or even secret detention at various locations in Turkey. Many were pressured into agreeing to “voluntarily” return to Syria and Iraq, in a flagrant breach of international law.”		
Freedom House http://www.freedomhouse.org/	http://www.freedomhouse.org/report-types/freedom-world#.U-3g5fl_sVc The status of Turkey on the Freedom in the World index 2016 is 'Partly free'. https://freedomhouse.org/report/freedom-net/freedom-net-2016 The status of Turkey on the Freedom on the Net 2016 is 'Not free'. https://freedomhouse.org/report/freedom-press/freedom-press-2016 The status of Turkey on the Freedom of the Press 2016 is 'Not free' and Turkey is one of the countries with the biggest decline with only two countries showing a bigger decline.	Country	
Reporters without Borders: Press Freedom Index https://rsf.org/ranking	https://rsf.org/ranking <i>2016 World Press Freedom Index</i> In 2016, Turkey ranked 151 out of 180 countries on World Press Freedom Index (No. 1 being the most free country).	Country	
Fund for Peace - Fragile States Index - the Fund for Peace is a US-based non-profit research and educational organization that works to prevent violent conflict and promote security. The Fragile States Index is an annual ranking, first published in 2005 with the name Failed States Index, of 177 nations based on their levels of stability and capacity http://fsi.fundforpeace.org/	<i>Fragile States Index 2016</i> http://fsi.fundforpeace.org/ Turkey is ranked 79 out of 178 countries on the Fragile States Index 2016. (No. 1 being the most failed state). This ranks Turkey in the category 'Elevated Warning'.	Country	
The Global Peace Index. Published by the Institute for Economics & Peace, This index is the world's leading measure of national peacefulness. It ranks 162 nations according to their absence of violence. It's made up of 23 indicators, ranging from a nation's level of military expenditure to its relations with neighbouring countries and the level of respect for human rights.	http://visionofhumanity.org/indexes/global-peace-index/ <i>2016 Global Peace Index</i> The State of Peace in Turkey is labeled 'Low' with Turkey ranking number 145 out of 163 countries (no. 1 being the most peaceful country) with a score of 2.710.	Country	
Additional sources of information (These sources were partly found by Googling the terms '[country]', 'timber', or 'conflict', 'illegal logging')	Evidence	Scale of risk assessment	Risk indication
The Independent	http://www.independent.co.uk/news/world/europe/turkey-coup-attempt-human-rights-president-erdogan-purge-turkish-military-a7148166.html <i>Press Release / July 21, 2016</i>	Country	

	<p><i>Turkey suspends European Convention on Human Rights in wake of attempted coup</i></p> <p>"Turkey will temporarily suspend the European Convention on Human Rights after announcing a state of emergency following the attempted coup.</p> <p>Deputy prime minister Numan Kurtulmus said on Thursday that Turkey would follow the example set by France when it did so following last November's attacks by Isis militants in Paris."</p>		
Aljazeera	<p>http://www.aljazeera.com/indepth/opinion/2016/08/turkey-coup-attempt-human-rights-responsibilities-160826132041778.html</p> <p><i>Press Release / August 26, 2016</i></p> <p><i>Turkey coup attempt: Human rights v responsibilities</i></p> <p>The unique case of Turkey</p> <p>"Turkey in this sense, has a distinctive place through its ability of reconciling both. Under the rule of the Justice and Development party (AK party), Turkey concomitantly put central emphasis on empowering civil society and responsible governance.</p> <p>Freedom without duty can destroy the freedom itself. Therefore, Turkey's latest successful policies rest upon a political vision that consolidates responsible governance in political society and wide spheres of freedom in civil society.</p> <p>In this sense, the Turkish nation's historic response to the putschists on July 15 is an indubitable manifestation of the harmony of state and society."</p>	Country	
The Huffington Post	<p>http://www.huffingtonpost.com/melissa-hooper/6-ways-human-rights-is-at-b_11116346.html</p> <p><i>Press Release / July 22, 2016</i></p> <p><i>6 Ways Human Rights Is At Risk In Turkey After The Coup Attempt</i></p> <p>"First, Turkey is curtailing free speech and free media by blocking dozens of websites since Saturday, alleging that they endanger national security or the public order. On Tuesday, the country's media regulation body also revoked the licenses of 24 radio and TV stations and the press credentials of 34 journalists allegedly tied to Gulen. Reporters Without Borders reported that many of the websites that are blocked simply mentioned that there was a coup attempt, and did not advocate any illegal activity.</p> <p>(..)</p> <p>Second, the Turkish government is violating the rights of freedom of association and (again) free speech by firing and arresting 2745 judges, including ten members of the Judges and Prosecutors High Council, who were alleged Gulenists. Hundreds of prosecutors and about 9000 police officers were also dismissed. Educational professionals were also targeted, with more than 15,200 teachers and educators suspended from work, 1577 deans ordered to resign, and the licenses of 21,000 teachers working at private institutions revoked.</p> <p>(..)</p>	Country	

	<p>Third, the right to life and right to proportional sentencing is at risk in Turkey because Erdogan has stated that he will reinstate the death penalty if parliament agrees. Parliament is scheduled to meet this week to discuss the issue. Turkey abolished the death penalty in 2004 as part of its bid to join the European Union. If it is reinstated, Turkey's membership in NATO may be suspended, its path toward E.U. membership would be threatened, and it would buck a worldwide trend toward abolition that has been gaining momentum over the past few years.</p> <p>(..)</p> <p>Fourth, the rights of refugees to safe passage and safe harbor are put at risk by threats to Turkey's deal with the European Union. Processing times for refugees transiting out will likely slow. In Turkey it is the government, rather than the U.N. refugee agency that manages the estimated 2.7 refugees in the country.</p> <p>(..)</p> <p>Fifth, the fundamental right to fair trial is threatened by the extreme street violence that began in the wake of the coup, including acts of torture. Since Saturday, journalists have documented incidents of torture and violence in the streets against soldiers that were involved in the attempt, many of whom were young conscripts. They have been stripped, beaten, and in one case possibly beheaded by mobs. Photographs document some of the violence, and demonstrate that police are standing by and allowing extreme violence to occur. Amnesty International is also investigating reports that those involved in the coup attempt are being mistreated in custody and denied access to counsel.</p> <p>Sixth, in declaring a three-month state of emergency today, Erdogan has put rule of law and due process at risk. The state of emergency makes it possible for Erdogan and his cabinet to bypass parliament when creating new legislation, prevents the constitutional court from reviewing new policies, broadens police power to arrest, and suspends application of the European Convention on Human Rights and the individual protections (free speech, liberty rights, etc.) it provides."</p>		
Inquiries Journal	<p>http://www.inquiriesjournal.com/articles/862/the-turkish-kurdish-conflict-in-theory-and-practice 2014, VOL. 6 NO. 03 PG. 1/3 <i>The Turkish-Kurdish Conflict in Theory and Practice</i> A Brief History of the Kurdish Conflict "Generally agreed by scholars of all fields is that the "Kurdish question is the main source of political instability in Turkey today" (Ozcelik, 2006, pg. 1). As of 2009, the death toll in Turkey, related to the conflict, had reached 30,000 and the cost estimate was \$6-8 billion per year (James and Ozdamar, pg. 25). The Kurdish conflict transcends borders because the ethnic Kurdish people do. The Kurdish people, who researchers believe are descended from the Medes, are</p>	Country	

	<p>primarily Sunni Muslim, however there are representative Christian and Jewish minorities as well (Ozcelik, pg.1-2). Of the 25 million Kurds today, about 14 million live in Turkey. The nations with the next largest Kurdish populations are Iran, Iraq and Syria (with around 2-3 million), but Turkey and Syria, as unfriendly neighbors, have experienced the most conflict (James/Ozdamar, pg. 24).”</p>		
<p>http://www.slideshare.net/musagenc1961/turkeys-forests</p>	<p><i>Presentation developed by Katip, Izmir from Celebi University in the course supported by Mevlana Exchange Programme, presented at the Tourism Department of Economy Faculty of Tetova State University, Macedonia in May 11-15, 2015</i></p> <p>The picture below shows where in Turkey forested areas exist. The legend of this sources explains that:</p> <ul style="list-style-type: none"> - Dark green = Productive forest - Medium light green = Degraded forests - Light green = Agriculture <div style="text-align: center;">  <p>Turkey forests in 2014</p> </div>	Country	
From national CW RA: Info on illegal logging	Not available	-	-
Conclusion on country context:		Country	

<p>Turkey scores medium on most indicators reviewed in this context section and medium-low on some indicators. The score of 9.52 on the World Bank's indicator for Political Stability and Absence of Violence/Terrorism is very low indicating political instability and violence in the country. On the other hand, the corruption level is above the world's average. Many indicators for the freedom of Turkey's citizens score lower than average. The press freedom has been low and has further sharply decreased in the past months to a level that there is hardly press freedom remaining. There is limited overlap of forested areas (mostly in Northwest and Southwest) and areas in conflicts, (mostly in East, South or Southeast). Illegal logging does not seem to be an important issue in Turkey.</p>			
<p>Indicator 2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.</p>			
<p>Guidance</p> <ul style="list-style-type: none"> • Is the country covered by a UN security ban on exporting timber? • Is the country covered by any other international ban on timber export? • Are there individuals or entities involved in the forest sector that are facing UN sanctions? 			
<p>Compendium of United Nations Security Council Sanctions Lists: www.un.org</p>	<p>https://scsanctions.un.org/fop/fop?xml=htdocs/resources/xml/en/consolidated.xml&xslt=htdocs/resources/xsl/en/consolidated.xsl</p>	Country	Low risk
<p>US AID: www.usaid.gov</p>	<p>There is no UN Security Council ban on timber exports from Turkey.</p> <p>Turkey is not covered by any other international ban on timber export.</p> <p>There are no individuals or entities involved in the forest sector in Turkey that are facing UN sanctions.</p>		
<p>Global Witness: www.globalwitness.org</p>			
<p>From national CW RA</p>	<p>Not available</p>	-	-
<p>Guidance</p> <ul style="list-style-type: none"> • Is the country a source of conflict timber? If so, is it at the country level or only an issue in specific regions? If so – which regions? • Is the conflict timber related to specific entities? If so, which entities or types of entities? 			
<p>www.usaid.gov</p> <p>Conflict Timber is defined by US AID as: - conflict financed or sustained through the harvest and sale of timber (Type 1), - conflict emerging as a result of competition over timber or other forest resources (Type 2) Also check overlap with indicator 2.3</p>	<p>No information on conflict timber in Turkey found.</p>	Country	Low risk
<p>www.globalwitness.org/campaigns/environment/forests</p>	<p>No information on conflict timber in Turkey found.</p>	Country	Low risk
<p>Human Rights Watch: http://www.hrw.org/</p>	<p>No information on conflict timber in Turkey found.</p> <p>https://www.hrw.org/world-report/2016</p> <p>No information found on conflict timber in Turkey in the World Report 2016.</p>	Country	Low risk

World Resources Institute: Governance of Forests Initiative Indicator Framework (Version 1) http://pdf.wri.org/working_papers/gfi_tenure_indicators_sep09.pdf Now: PROFOR http://www.profor.info/node/1998	No information found on conflict timber in Turkey.	Country	Low risk
Amnesty International Annual Report: The state of the world's human rights -information on key human rights issues, including: freedom of expression; international justice; corporate accountability; the death penalty; and reproductive rights http://www.amnesty.org	No information in the Amnesty International Report 2015-16 on conflict timber in Turkey found.	Country	Low risk
World Bank: Worldwide Governance Indicators - the WGI report aggregate and individual governance indicators for 213 economies (most recently for 1996–2014), for six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption http://info.worldbank.org/governance/wgi/index.aspx#home Use indicator 'Political stability and Absence of violence' specific for indicator 2.1	http://info.worldbank.org/governance/wgi/index.aspx#reports In 2014 (latest available year) Turkey scores on the indicator <i>Political Stability and Absence of Violence/Terrorism</i> score 9.52 on the percentile rank among all countries (ranges from 0 (lowest) to 100 (highest rank) with higher values corresponding to better outcomes. No evidence found that this rank has a relationship with conflict timber.	Country	Low risk
fzGreenpeace: www.greenpeace.org Search for 'conflict timber [country]'	No information on conflict timber or illegal logging in Turkey found.	Country	Low risk
CIFOR: http://www.cifor.org/ http://www.cifor.org/publications/Corporate/FactSheet/forests_conflict.htm	No information on conflict timber or illegal logging in Turkey found.	Country	Low risk
Google the terms '[country]' and one of following terms or in combination 'conflict timber', 'illegal logging'	No information on conflict timber or illegal logging in Turkey found.	Country	Low risk
From national CW RA	Not available	-	-
Conclusion on indicator 2.1: No information was found on Turkey as a source of conflict timber and the forest sector is not associated with any violent armed conflict. There is no UN security ban, other ban or UN sanction. The following low risk thresholds apply: (1) The area under assessment is not a source of conflict timber ³ ; AND (2) The country is not covered by a UN security ban on exporting timber; AND		Country	Low risk

³ “Conflict timber” limited to include “timber that has been traded at some point in the chain of custody by armed groups, be they rebel factions or regular soldiers, or by a civilian administration involved in armed conflict or its representatives, either to perpetuate conflict or take advantage of conflict situations for personal gain - conflict timber is not necessarily illegal. Please refer to FSC-PRO-60-002a V1-0.

<p>(3) The country is not covered by any other international ban on timber export; AND (4) Operators in the area under assessment are not involved in conflict timber supply/trade; AND (5) Other available evidence does not challenge 'low risk' designation.</p>			
<p>Indicator 2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.</p> <p>Guidance</p> <ul style="list-style-type: none"> • Are the social rights covered by the relevant legislation and enforced in the country or area concerned? (refer to category 1) • Are rights like freedom of association and collective bargaining upheld? • Is there evidence confirming absence of compulsory and/or forced labour? • Is there evidence confirming absence of discrimination in respect of employment and/or occupation, and/or gender? • Is there evidence confirming absence of child labour? • Is the country signatory to the relevant ILO Conventions? • Is there evidence that any groups (including women) feel adequately protected related to the rights mentioned above? • Are any violations of labour rights limited to specific sectors? 			
<p>general sources from FSC-PRO-60-002a V1-0 EN</p>		<p>information found and specific sources</p>	
<p>Status of ratification of fundamental ILO conventions: http://www.ilo.org/dyn/normlex/en/f?p=1000:11001:0::NO:: or use: ILO Core Conventions Database: http://www.ilo.org/ilolex/english/docs/declworld.htm C29 Forced Labour Convention, 1930 C87 Freedom of Association and Protection of the Right to Organise Convention, 1948 C98 Right to Organise and Collective Bargaining Convention, 1949 C100 Equal Remuneration Convention, 1951 C105 Abolition of Forced Labour Convention, 1957 C111 Discrimination (Employment and Occupation) Convention, 1958 C138 Minimum Age Convention, 1973 C182 Worst Forms of Child Labour Convention, 1999</p> <p>Ratification as such should be checked under Category 1. In Cat. 2 we take that outcome into consideration. Refer to it.</p>		<p>http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102893 Turkey has ratified all 8 ILO core conventions. The status of all 8 conventions is "in force".</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3172701:NO <i>Observation (CEACR) - adopted 2014, published 104th ILC session (2015) Forced Labour Convention, 1930 (No. 29) - Turkey</i> "Articles 1(1), 2(1) and 25 of the Convention. Trafficking in persons. (a) Law enforcement measures. The Committee previously noted the information from the International Trade Union Confederation (ITUC) that trafficking in persons occurs in the country, with most of the trafficking cases relating to prostitution of women from Eastern Europe and forced labour of persons from Central Asia. The Committee notes the statement in the communication of the TISK that Turkey is a destination and transit country for trafficked women, men and children. The TISK indicates that the Government has devoted serious attention to trafficking in persons, and that noteworthy progress has been achieved with regard to bringing traffickers to court and reducing the acquittal rate in cases involving defendants charged with the offence. (..) The Committee notes that the UN Human Rights Committee, in its concluding observations of 13 November 2012, expressed concern at the number of cases of trafficking in persons, and at the fact that only a few cases have resulted in</p>	
		<p>Country</p>	<p>Low risk</p>
		<p>Country</p>	<p>Specified risk on forced labour</p>
		<p>Country</p>	<p>Low risk on forced labour</p>
		<p>Country</p>	<p>Specified risk on</p>

	<p>investigations, prosecution and sentences (CCPR/C/TUR/CO/1, paragraph 15). <i>Noting the significant number of cases brought to justice regarding trafficking in persons, the Committee encourages the Government to strengthen its efforts to ensure that all persons who engage in trafficking are subject to prosecution and that in practice, sufficiently effective and dissuasive penalties of imprisonment are imposed. It requests the Government to provide information on measures taken in this regard, including training and capacity building of law enforcement authorities, as well as on the results achieved. Please also provide information on the number of prosecutions, convictions and specific penalties applied pursuant to sections 80 and 227(3) of the Penal Code.</i></p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3172698:NO</p> <p><i>Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Forced Labour Convention, 1930 (No. 29) – Turkey</i></p> <p>“Article 2(2)(c). Work of prisoners for private entities. In previous comments, the Committee noted that section 20 of the Regulation on the Administration and Bidding of Penitentiaries and Work Centres of Detention Institutions of 2005 states that detainees may be asked to work, but shall not be obliged to do so. It noted that, pursuant to this Regulation and the Regulation on Administration of Penitentiaries and Execution of Sentences of 2006, prisoners’ conditions of work may be considered as approximating those of a free labour relationship. The Committee nonetheless observed that the legislation did not appear to require the free, informed and formal consent of prisoners to work for private enterprises. In response, the Government indicated that it was not possible to employ prisoners without their consent or without a request from the prisoner. The Government indicated that the Circular on Implementation of Work Centres No. 137/3 (published by the Supreme Council of Work Centres) determines the conditions of work of prisoners, both within and outside of prisons and that this Circular included a standard contract regulating a prisoner’s employment.</p> <p>The Committee notes the copy of the Circular No. 137/3, submitted with the Government’s report, but observes that this Circular does not provide that a contract regulating a prisoner’s employment must be signed between the prisoner and the employer. <i>Noting the Government’s previous indication that it is not possible to employ prisoners without their consent, the Committee requests the Government to indicate the measures taken to ensure that a prisoner’s consent to work for private enterprises, either within or outside of prisons, is provided formally, and that such consent is informed, free from the menace of any penalty. In this regard, the Committee once again requests the Government to provide examples of signed contracts concluded between prisoners and employers.</i></p>	Country	<p>forced labour</p> <p>No assessment regarding the risk on forced labour (work of prisoners for private entities)</p>
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	<p>Article 2(2)(d). Powers to call up labour in cases of emergency. In its previous comments, the Committee noted that, under article 18 of the Constitution of Turkey, the term “forced labour” does not include services required from citizens during a state of emergency, which may be declared, under article 119 of the Constitution, in the event, among other things, of a “serious economic crisis”. It also noted that under the State of Emergency Act (No. 2935 of 1983), the Council of Ministers may issue decrees to determine obligations and measures to be taken in the event of serious economic crises, which may concern, inter alia, labour issues. In this regard, the Committee noted the Government’s indication that Turkey has experienced economic crises in the past but that no state of emergency was called. The states of emergency referred to in article 119 of the Constitution relate to conditions obstructing life in the country and, even under these conditions, this does not allow for the exaction of forced labour, as article 18 of the Constitution explicitly prohibits forced labour.</p> <p>While noting the Government’s previous indications regarding the application of these provisions in practice, the Committee recalls that the notion of “serious economic crises” does not appear to satisfy the criteria for the exception of “emergency situations” in the strict sense of the term, described in Article 2(2)(d) (that is, to the events of war or of a calamity or threatened calamity). The Committee therefore hopes that the Government will take the necessary measures in order to limit the exaction of compulsory work or service in cases of emergency to the strict minimum allowed by the Convention, in line with the current practice. Pending the adoption of such measures, the Committee requests the Government to continue to provide information on the application of the State of Emergency Act (No. 2935 of 1983) and article 119 of the Constitution in practice.</p> <p>Articles 2(2)(b) and (e). Minor communal services. The Committee previously noted that sections 12 and 13 of the Village Affairs Act, No. 442, of 18 March 1924, provided for “mandatory works for villagers”, and that failure to perform this work shall be penalized. It noted that some of the work listed in section 13 as “mandatory for villagers” (including building and repairing roads leading from the village to the government centre or neighbouring villages, or building bridges over such roads, etc.) did not seem to meet the criteria of “minor services” or “communal services”, and that there was no provision for consultation regarding these works or services. In this regard, the Committee noted the Government’s indication that the task of village administration has changed significantly since the enactment of the Village Affairs Act in 1924 and that a new draft Village Affairs Bill had been developed, taking into consideration the views of concerned parties.</p> <p>Noting an absence of information on this point in the Government’s report, the Committee recalls that minor communal services may be excluded from the scope of the Convention only if certain criteria are met: (i) the services must be “minor services”, i.e. relating primarily to maintenance work and, in exceptional</p>	Country	Specified risk on forced labour
		Country	Specified risk on forced labour

	<p>cases, to the erection of certain buildings intended to improve the social conditions of the population of the community itself; (ii) the services must be performed in the direct interest of the community and not relate to the execution of works intended to benefit a wider group; and (iii) the members of the community itself, i.e. the community which has to perform the services, or their “direct” representative (e.g. the village council) must have the right to be consulted in regard to the need for such services (General Survey of 2012, paragraph 281). <i>The Committee accordingly requests the Government to take the necessary measures to ensure that the Village Affairs Bill only permits minor communal services performed in the direct interest of the community, following consultation with the said community, in conformity with Article 2(2)(e) of the Convention. It requests the Government to provide a copy of the Village Affairs Bill, once it has been adopted.</i>”</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3255738:NO</p> <p><i>Observation (CEACR) - adopted 2015, published 105th ILC session (2016) Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) – Turkey</i></p> <p>“Civil liberties. The Committee recalls that for a number of years it has been commenting upon the situation of civil liberties in Turkey. The Committee notes from the ITUC observations that five leaders of trade unions representing a wide range of workers, charged with inciting the public to illegally assemble and demonstrate, were acquitted by the Criminal Court of First Instance No. 28, in Istanbul on 24 March 2015.</p> <p>The Committee further notes, from the latest observations of the KESK, serious allegations of numerous dismissals, harassment, retaliatory action, arrests and police assaults against the KESK and its members for the exercise of legitimate trade union activity. <i>The Committee requests the Government once again to provide information on the measures taken to ensure a climate free from violence, pressure or threats of any kind so that workers and employers can fully and freely exercise their rights under the Convention. The Committee requests the Government to provide detailed comments to the KESK observations in this regard.</i>”</p> <p>(..)</p> <p>“Article 3. Right of workers’ organizations to organize their activities and formulate their programmes. The Committee recalls that, along with the Committee on Freedom of Association, it has been requesting the Government to ensure that section 63 of Act No. 6356 was not applied in a manner so as to infringe on the right of workers’ organizations to organize their activities free from government interference. The Committee notes with interest the information provided by the Government on a Constitutional Court judgment rendered on 2 July 2015 which found that the Council of Ministers’ Decree under section 63 of Act No. 6356, suspending a strike in a glass-making</p>	Country	Specified risk for the right to organize
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	<p>company for 60 days on the grounds that it was disruptive to public health and national security, was in breach of the trade union rights guaranteed by article 51 of the Turkish Constitution. <i>The Committee requests the Government to continue to provide information on the use of section 63 following the judgment of the Constitutional Court and any relevant court judgments.</i></p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3255742:NO</p> <p><i>Direct Request (CEACR) - adopted 2015, published 105th ILC session (2016) Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) – Turkey</i></p> <p>“Article 2 of the Convention. Right of workers to establish and join organizations. The Committee recalls that its previous observation concerned section 7(d) of Act No. 6289 on public servants’ unions and collective agreements, amending Act No. 4688, which requires that trade union statutes provide the place of residence of the founders of an organization to the office of the Governor of the province in order to be incorporated; and section 10(8) which provides for the removal of union executive bodies upon application that can be made by the Ministry of Labour and Social Security in case of non-respect of requirements concerning meetings and decisions of general assemblies, set out in the law.</p> <p>The Committee duly notes the Government’s indication that incomplete information does not affect the establishment of the union or the acquisition of legal personality. <i>As the Government has not supplied the practical information previously requested, the Committee once again requests the Government to provide information on the manner in which section 7(d) of Act No. 6289 is applied and whether this has given rise to any claims or complaints with respect to delays, difficulties in registration or harassment, and what, if any, steps the Government has taken in this regard.</i></p> <p>As regards the removal of union executive bodies in case of non-respect of requirements concerning meetings and decisions of general assemblies upon application that can be made by the Ministry of Labour and Social Security, the Committee requested the Government to review this provision in consultation with the social partners with a view to its amendment. The Committee notes the Government’s indication that such decisions can only be taken after due process of law by the competent courts and are aimed at ensuring the democratic functioning of such meetings. <i>The Committee once again requests the Government to review section 10(8) of Act No. 6289 in consultation with the social partners, and to provide information on its application in practice.</i></p> <p>Article 3. Right of workers’ organizations to elect their representatives in full freedom and to organize their activities. In its previous comments, the Committee had noted the concerns raised by the Confederation of Progressive Trade Unions of Turkey (DİSK) and the International Trade Union Confederation (ITUC) that section 9 of Act No. 6356 on trade unions and</p>	Country	Specified risk for the right to organize
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	<p>collective labour agreements limits the number of board members for branch trade unions to five, reduced from nine in the previous law. The Committee notes the Government's indication that while this limitation is aimed at preventing abuse of special protections afforded to trade union executives and was agreed to by consensus of the social partners, under subparagraph 2, the parties may set up other organs as they need.</p> <p>As regards section 58 of Act No. 6356, the Committee had observed, in its previous comments, that this provision restricted lawful strikes to disputes during collective bargaining negotiations and had requested the Government to indicate the manner in which protest action, sympathy strikes and other means of legitimate industrial action are protected in line with the 2010 constitutional amendment. <i>As the Government refers generally to the practical application of this section, the Committee once again requests it to indicate specifically the manner in which the above forms of action are protected.</i>" (..)</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3255724:NO</p> <p>Observation (CEACR) - adopted 2015, published 105th ILC session (2016) Right to Organise and Collective Bargaining Convention, 1949 (No. 98) – Turkey</p> <p>“Articles 1 and 3 of the Convention. Protection against acts of anti-union discrimination. The Committee once again recalls that the June 2013 Conference Committee on the Application of Standards had requested the Government to establish a system for collecting data on anti-union discrimination in the private sector and to provide information on the functioning of national complaints mechanisms and all statistical data related to anti-union discrimination in the private and public sectors. The Committee notes the Government's indication that no system exists for collecting such data. The Committee also notes however the serious allegations of anti-union harassment raised by the KESK in relation to the Government's use of the Basic National Education Act and the Regulations on the appointment of the directors of institutes of education, to discriminate against its members. The Committee requests the Government to reply specifically to the most recent observations of the KESK in this regard. In the light of the continuing concerns raised, the Committee once again requests the Government to establish a system for collecting data on anti-union discrimination (in both private and public sectors) and to provide information on the concrete steps taken in this respect. The Committee reminds the Government that it may avail itself of the technical assistance of the Office in this regard.</p> <p>The Committee notes with interest the clarification brought by the Constitutional Court in a judgment handed down on 22 October 2014 which raises the fine that shall be payable for unjustified dismissal and further grants the right for workers to initiate legal proceedings for reinstatement should they consider that they were dismissed on anti-union grounds.</p>	Country	Specified risk for the right to organize
		Country	Specified risk for the right to organize and collective bargaining (several regulations posing some risk)

Article 4. **Collective bargaining.** In its previous comments, the Committee noted that section 34 of Act No. 6356 provided that a collective work agreement may cover one or more than one workplace in the same branch of activity, which, it considered, appeared to limit the right of workers' and employers' organizations to freely determine how and at what level to carry out collective bargaining. The Committee notes the Government's indication that the Act has also introduced the possibility of concluding a "framework agreement" at the branch of activity level alongside enterprise level collective labour agreements. The Government adds that the use of this new means of bargaining and the experience to be gained will show the direction that the Turkish collective bargaining system might take in the future. *The Committee therefore requests the Government to review the impact of section 34 of the Act and to consider, in consultation with the social partners, its amendment in a manner so as to ensure that it does not restrict the possibility of the parties to engage in cross-sector regional or national agreements. It requests the Government to provide information on the steps taken in this regard.*

The Committee recalls its previous comments in relation to section 35(2) of Act No. 6356 which states that the parties cannot extend or reduce the validity of a collective agreement once signed. In this regard, the Committee takes due note of the Government's indication that this provision does not restrict the right of the parties to a collective agreement to agree to make changes to its provisions, but rather restricts only the possibility of changing the agreement's duration with a view to recognizing rival trade unions' right to collective bargaining by imposing time limits to the duration of the agreement.

The Committee recalls that section 41(1) of Act No. 6356 sets out the following requirement for becoming a collective bargaining agent: the union should represent at least one per cent (progressively, 3 per cent) of the workers engaged in a given branch of activities and more than 50 per cent of workers employed in the workplace and 40 per cent of workers of the enterprise to be covered by the collective agreement. Reiterating its long-standing concerns related to the double threshold for collective bargaining which requires on the one hand representation at the branch level and on the other hand majority representation at the workplace, the Committee expressed the firm hope that the thresholds would be revised and lowered in consultation with the social partners. The Committee notes with *interest* the Government's indication that Act No. 6356 was amended by Act No. 6645 of 4 April 2015 to provide the right to bargain collectively without meeting the abovementioned branch threshold for the following categories of trade unions: (i) trade unions which could not complete the transitional period; (ii) trade unions which fulfilled the 10 per cent threshold according to the statistics published in July 2009; and (iii) the abovementioned categories of trade unions which conclude labour agreements in other workplaces of the same branch of activity where they have a majority within one year after the entry into force of this provision. According to the statistics published by the Ministry of Labour and Social Security, the rate of

	<p>unionization in the private sector rose from 9.21 per cent in January 2013 to 10.65 per cent in January 2015 and to 11.21 per cent in July 2015. According to the Government, this attests to the positive effects of the e-State gate. <i>Recalling the concerns that had been expressed by several workers' organizations in relation to the perpetuation of the double threshold, accompanied by new methods of data collection on representativity, the Committee trusts that the Government will continue to review this matter with the social partners concerned, including as regards the impact of the thresholds on collective bargaining coverage. The Committee requests the Government to provide information on the steps taken in this regard and statistics related to collective bargaining coverage in the country.</i></p> <p><i>In its previous comments, the Committee had noted that sections 46(2), 47(2), 49(1), 51(1), 60(1) and (4), 61(3) and 63(3) provided for a variety of situations in which the certificate of competence to bargain may be withdrawn by the authorities (the failure to call on the other party to start negotiations within 15 days of receiving the certificate of competence; the failure to attend the first collective bargaining meeting or failure to begin collective bargaining within 30 days from the date of the call; failure to notify a dispute to the relevant authority within six working days; failure to apply to the High Arbitration Board; failure to take a strike decision or to begin a strike in accordance with the legislative requirements; and failure to reach an agreement at the end of the term of strike postponement). The Committee requested the Government to take the necessary measures to amend these provisions to avoid interference in the bargaining process. The Committee notes the Government's indication that these measures are designed to ensure the bargaining process is completed in 120 days and that there is no restriction on the continuation of the negotiations between parties during strike action. The Committee requests the Government to provide information on any use of these sections and to continue to review their application with the social partners concerned with a view to their eventual amendment, favouring collective bargaining where the parties so desire." (..)</i></p> <p>http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:3256193</p> <p><i>Observation (CEACR) - adopted 2015, published 105th ILC session (2016) Equal Remuneration Convention, 1951 (No. 100) – Turkey</i></p> <p>“Job segregation and gender wage gap. The Committee notes that, according to TÜRK-İŞ, employers may be exonerated from applying statutory provisions in certain sectors with a high proportion of women, such as the textile industry, food sector and tourism, where workers are paid “in accordance with the work performed”. TÜRK-İŞ further indicates that, due to lack of education, women occupy unskilled low-paid jobs. The Committee also notes that KESK indicates that flexible and insecure forms of employment are widening the gender wage gap and perpetuating the gender-based division of labour within the family. The Committee also notes that, according to the</p>	Country	Specified risk on gender wage discrimination
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country profile prepared in 2013 for the use of the European Commission “The current situation of gender equality in Turkey”, the female employment rate between 2002 and 2012 increased from 22.7 per cent to 28.7 per cent. However, horizontal segregation is more pronounced than in the European countries for both sectors and occupations, even though the rate of tertiary education attainment of women in Turkey has increased from 6.6 per cent in 2002 to 10.6 per cent in 2012. According to the study, the figures show a gender-typical distribution of fields of study with most Turkish women being present in health and welfare (61.0 per cent). The Committee further notes that, according to the statistics provided by the Government the wage gap is 19.4 per cent among professionals; 7.4 per cent among technicians and subsidiary professionals; 7.4 per cent among clerks, service and sales workers; 16.6 per cent among craftsmen; and 24.1 per cent among plant and machine operators and assemblers. *The Committee requests the Government to ensure that all sectors, including those where women are most represented, apply the legislation in force with respect to wages. The Committee further requests the Government to continue to take proactive measures to address gender job segregation, including through the promotion of women’s studies and vocational training in sectors where men are predominantly occupied in order to increase women’s participation in the labour market. Please provide statistics on men and women’s occupation by sector and occupation disaggregated by sex.*

Articles 1 and 4 of the Convention. **Equal remuneration for men and women workers for work of equal value. Training and awareness raising with the cooperation of the workers’ and employers’ organizations.** *In its previous comments, the Committee urged the Government to carry out specific activities to improve understanding and raise awareness of the principle of the Convention. The Committee notes that the Government refers to the establishment of the Platform for Equality at work established in 2013 with the aim of reducing the gender equality gap, with the participation of enterprises. In April 2013, 78 companies became members of the Platform and signed a Declaration of Equality at Work, one of its objectives being “equal pay for equal work”. The Government also refers to the Gender Equality in Working Life Award which has the objective of rewarding enterprises that implement equal pay. The Government also indicates that between 2009 and 2013, 26 training sessions were held. The Committee recalls in this respect that according to section 5(4) of the Labour Act “Differential remuneration for similar jobs or for work of equal value is not permissible” and that is in conformity with the Convention that provides for “equal remuneration for men and women workers for work of equal value”. The Committee recalls that the concept of “work of equal value” which is provided for in section 5(4) of the Labour Act lies at the heart of the fundamental right of equal remuneration for men and women for work of equal value, and the promotion of equality and that it goes beyond equal remuneration for “equal”, “the same” or “similar” work and also*

	<p>encompasses work that is of an entirely different nature, which is nevertheless of equal value. <i>The Committee once again urges the Government to carry out, in consultation with workers' and employers' organizations, specific activities, to improve understanding and raise awareness of the principle of the Convention. Please ensure that these are not restricted to equal pay for equal work but refer to "work of equal value", and to provide information thereon.</i></p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3256197:NO</p> <p><i>Direct Request (CEACR) - adopted 2015, published 105th ILC session (2016) Equal Remuneration Convention, 1951 (No. 100) – Turkey</i></p> <p><i>"Article 1 of the Convention. Equal remuneration for men and women for work of equal value. In its previous comment, the Committee requested the Government to confirm that the equal pay provisions of the Labour Act (section 5(4)) applied to agricultural and forestry workers and to indicate the manner in which the principle of the Convention applied in practice in these sectors. It further requested the Government to ensure that the equal pay provisions in the draft Civil Aviation Act fully reflected the principle of the Convention. With respect to the agriculture and forestry sectors, the Committee notes the Government's indication that establishments and enterprises operating in the forestry and agriculture sectors and employing a minimum of 50 employees are subject to the provisions of the Labour Act. Otherwise, the Code of Obligations applies. Section 411 of this Code provides that employers are obliged to pay workers the wage specified in the contract or collective bargaining agreements, or if not provided for, the wage should be the equivalent to the wage paid to their peers, on the condition that it is not less than the minimum wage. The Committee notes, however, that section 111 of the Labour Act provides that "Working conditions, employment contracts, wages and organization work of those employed in activities deemed as agricultural and forestry work shall be indicated in a regulation to be issued by the Ministry of Labour and Social Security". The Committee requests the Government to provide information on the regulations adopted by the Ministry of Labour and Social Security concerning working conditions and wages in the agricultural and forestry sectors and how it is ensured that section 5(4) of the Labour Act is effectively applied to these sectors. Noting that the Government provides no information on the adoption of the Civil Aviation Act, the Committee requests the Government once again to indicate if the principle of the Convention has been fully taken into account in the Act.</i></p> <p>Civil service. In its previous comments the Committee noted that section 203 of the Civil Servants Act – which provides that family allowances are paid to the father if both parents are civil servants – was being examined. The Committee notes that no further information was provided by the Government. <i>The Committee requests the Government to ensure that the new provision will adequately take the Convention into consideration and that the decision</i></p>	Country	Specified risk on gender wage discrimination in forestry sector
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	<p>concerning which of the two parents will receive the family allowances is left to the parents in each case.”</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3172712:NO <i>Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015)</i> <i>Abolition of Forced Labour Convention, 1957 (No. 105) – Turkey</i> (..) “Article 1(b). Use of conscripts for purposes of economic development. The Committee previously noted that section 10 of the Military Service Act, No. 1111, as amended by Act No. 3358, as well as section 5 of Council of Ministers Resolution No. 87/11945 of 1987, adopted pursuant to section 10 of Act No. 1111, lay down procedures relating to the surplus reserves, including procedures concerning persons liable to perform military service who are assigned duties in public bodies and institutions. In this regard, it noted the Government’s statement that Act No. 3358 had not been applied after 1991 and that a new draft Military Service Bill had been drawn up to embody a policy of protecting persons conscripted into military service from being assigned duties in public bodies or undertakings without their consent. The Committee notes the Government’s statement that the amendments made to the Military Service Act, No. 1111 take into consideration international obligations, current conditions, as well as the needs of the country. In this regard, the Committee notes that, according to the most recent version of the Military Service Act, No. 1111, available on the Government’s website, this Act has been amended 12 times between the period 2009–14. However, the Committee notes that these amendments do not appear to relate to the procedures regarding assigning conscripts in the surplus reserve to work for public bodies and institutions. <i>Recalling that the Committee has been raising this issue for a number of years, the Committee requests the Government to take measures to ensure the amendment of the Military Service Act, No. 1111, to bring it into conformity with the Convention.</i>”</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3256204:NO <i>Direct Request (CEACR) - adopted 2015, published 105th ILC session (2016)</i> <i>Discrimination (Employment and Occupation) Convention, 1958 (No. 111) – Turkey</i> (..) “Articles 1 and 2. Equality of opportunity and treatment in employment and occupation irrespective of race, colour and national extraction. The Committee notes with regret that, once again, the Government provides no information on the situation in employment and occupation of non-Muslim minorities, as well as Turkish citizens of Kurdish and Roma origin. The Committee referred previously in this respect to the absence of a broad legislative framework for the recognition of all minorities and the protection of their rights. The Committee notes, however, that in its report to the CERD, the</p>	Country	Specified risk on forced labour
		Country	Specified risk on discrimination of minorities

	<p>Government provided information on several activities, meetings and projects aimed at increasing Roma inclusion in society carried out in the country. For example, in June 2012, the Ministry of Labour and Social Security launched the “Improving Social Inclusion and Access to the Labour Market for Disadvantaged Groups”, within which Roma are specifically targeted (CERD/TUR/4-6, of 17 April 2014, paragraphs 62–63). <i>The Committee requests the Government to take measures to ensure that the existing legal framework covers all minorities, particularly non-Muslims and Turkish citizens of Kurdish and Roma origin, against discrimination in employment and occupation. The Committee also requests the Government to provide concrete information on any measures or activities undertaken to address the situation of these minorities, including awareness-raising campaigns. Please provide information on the impact of these measures on the inclusion of these minorities in the labour market.</i></p> <p>Sexual harassment. In its previous comment, the Committee requested the Government to provide information on the manner in which sexual harassment is defined and interpreted at the national level, taking into account that neither sections 24 or 25 of the Labour Code, nor section 105 of the Penal Code, provide a definition of that term. The Committee notes the Government's indication that the Supreme Court has issued several decisions on sexual harassment. TISK also refers to these decisions. <i>The Committee requests the Government to provide concrete information on the different decisions adopted by the Supreme Court, in particular, on the definition of sexual harassment at work, the persons responsible, the sanctions imposed and the remedies granted. Please also provide information on any measures taken to prevent and address sexual harassment in employment and occupation.”</i> (..)</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3256200:NO <i>Observation (CEACR) - adopted 2015, published 105th ILC session (2016) Discrimination (Employment and Occupation) Convention, 1958 (No. 111) – Turkey</i> “Articles 1 and 2 of the Convention. Discrimination based on political opinion. For many years, the Committee has been requesting the Government to provide information on the practical application of the Anti-Terrorism Act and the Penal Code in cases involving journalists, writers and publishers expressing their political opinions. In this regard, the Committee notes that TÜRK-İŞ reiterates that hundreds of journalists have been arrested or convicted because of their views and that they also face lawsuits due to their political opinions. The Committee notes with deep regret that once again the Government has not provided any information on this issue. <i>The Committee requests the Government to take all the necessary measures without delay to ensure that no journalist, writer or publisher is restricted in the exercise of their</i></p>	Country	Specified risk for rights of journalists and publishers
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	<p><i>employment and occupation because of their political opinions. The Committee once again requests the Government to provide information on the practical application of the Anti terrorism Act and the Penal Code in cases involving journalists, writers and publishers, as well as on all the cases brought before the courts against them, indicating the charges brought and the outcome.</i></p> <p>Discrimination in recruitment and selection. For a number of years, the Committee has been referring to the fact that section 5(1) of the Labour Code, which prohibits any discrimination based on language, race, sex, political opinion, philosophical belief, religion and sect, or similar reasons in the employment relationship, does not prohibit discrimination at the recruitment stage. In this regard, the Committee also noted that section 122 of the Penal Code provides for penal sanctions for those responsible for discrimination, but that, according to TISK's observations, victims could not claim compensation. The Committee notes that the Government only indicates that, following the adoption of a decree in February 2014, disability has been included as one of the grounds of discrimination protected under section 5(1) of the Labour Code. <i>The Committee once again requests the Government to take the necessary measures to ensure that victims of discrimination in recruitment and selection have access to adequate procedures and remedies, and to provide information thereon. The Government is also requested to provide information on the number, nature and outcome of criminal proceedings under section 122 of the Penal Code.</i></p> <p>Article 2. Equality of opportunity and treatment for men and women. <i>The Committee has been referring to the need to promote gender equality and to increase women's participation in the labour market, including in those jobs and occupations mainly carried out by men. The Committee notes the information provided by the Government on the adoption of legal provisions establishing various incentives for the employment of women and for the inclusion of rural women workers in the social insurance scheme.</i> The Government also refers to various projects and programmes, including vocational training programmes aimed at the inclusion of women in the labour market, and to the National Employment Strategy which has the objective, among others, of raising the labour force participation rate of women to 41 per cent by 2023. Furthermore, the Government refers to the adoption of Act. No. 6356 of 2012 on trade unions and collective bargaining under which trade unions have to consider gender equality in their activities. <i>The Committee notes TISK's indication that, as a result of the support provided to employers in those sectors employing women, their employment rate rose from 26.2 per cent in 2008 to 30.8 per cent in 2013. However, according to TISK, this rate is still very low due to: (i) the lack of adequate levels of education and vocational training for women, who are mainly trained in occupations that are socially accepted as being specific to women; (ii) women are limited to childcare and housework due to gender stereotypes; and (iii) the absence of adequate childcare facilities.</i> The Committee also notes that HAK-IS, TÜRK-İŞ and</p>	Country	Specified risk for discrimination
		Country	Specified risk on gender discrimination

	<p>KESK refer to the impact of gender stereotypes on the labour market participation of women and the lack of adequate work-life balance and childcare facilities. TÜRK-İŞ and HAK-IS also indicate that the low rate of unionization of women hinders the effective enforcement of their rights. TÜRK İŞ further indicates that new forms of flexible employment, such as homework, part-time work and temporary work, do not contribute to increasing women's labour market participation, as they perpetuate gender stereotypes and deprive women of social security. The Committee notes, from the statistics provided by the Government, the significant gender segregation persisting in the country, with women more represented in sectors such as education and care. The Committee notes that the impact of some of these training programmes is low with only 914 women employed out of 9,856 women trained. The Committee recalls that providing vocational guidance and taking active measures to promote access to education and training, free from considerations based on stereotypes or prejudices, is essential in broadening the range of occupations which men and women are able to choose. <i>The Committee requests the Government to continue taking measures, including in the framework of the National Employment Strategy, to promote the access of women to adequate education and vocational training, and to a wider range of jobs and occupations, and to provide information on specific improvements in this regard. The Committee further requests the Government to take measures for the provision of childcare facilities to facilitate the participation of women in the labour market, and to carry out awareness-raising activities to combat gender stereotypes. Please provide information in this regard. With respect to Act No. 6356, the Committee requests the Government to provide information on its implementation and, in particular, copies of collective agreements that refer to the above issues.</i></p> <p>(..)</p> <p>Civil service. In its previous comments, the Committee requested the Government to take proactive measures to: encourage women's participation in the civil service; address any allegations of gender discrimination in the civil service; ensure that men and women can effectively participate on an equal footing in examinations for positions in the civil service; and provide statistics disaggregated by sex on participants in these examinations. The Committee notes the Government's indication that the number of women working in the civil service is 991,817, while the number of men is 1,670,562. It further indicates that the number of women in management posts has increased from 480 in 2008 to 595 in 2014. However, the Committee notes that KESK refers to different situations of discrimination of civil servants (the recording in personnel files of inappropriate data, discriminatory use of promotion and appointments, and of the rewards system) and to the lack of adequate sanctions in the event of discrimination. The Committee notes in this regard that no concrete information has been provided by the Government on these issues. <i>Noting the low participation of women in the civil service, the Committee once again</i></p>	Country	Specified risk on gender discrimination
		Country	Specified risk on gender discrimination

	<p>requests the Government to take proactive measures to encourage women's participation in the civil service, to ensure that both men and women can participate in examinations for positions in the civil service on an equal footing and to address any allegations of gender discrimination. The Committee requests the Government to provide concrete information on any developments in this regard.</p> <p>Noting KESK's allegations concerning discrimination against Kurdish or Muslim Alevi civil servants on the basis of their ethnic origin or religion through, among others, the recording of inappropriate data in their personnel files, the Committee requests the Government to provide its comments in this respect. It also requests the Government to provide information on the measures taken concerning the Committee's previous comment related to security investigations into candidates for the civil service.</p> <p>Enforcement. Noting that the Government provides no information in this respect, the Committee once again requests the Government to provide information on the complaints dealt with by the labour inspectorate related to the implementation of section 5 of the Labour Code, as well as the cases brought before the judicial authorities, the outcome of such cases, the remedies granted and sanctions imposed."</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3172498:NO</p> <p>Observation (CEACR) - adopted 2014, published 104th ILC session (2015) Minimum Age Convention, 1973 (No. 138) – Turkey</p> <p>"Article 1 of the Convention. National policy designed to ensure the effective abolition of child labour and the application in practice of the Convention. The Committee notes the indication of the TÜRK-İŞ that child labour in Turkey is found in the urban informal sector, in the domestic service, and in seasonal agricultural work.</p> <p>The Committee notes the Government's statement that the Ministry of Labour and Social Security has launched a project on the Activation of Local Sources on Preventing Child Labour, targeting children engaged in hazardous occupations in small and medium enterprises, on the street and in seasonal agricultural work. The Government also indicates that child labour monitoring units in five pilot provinces have carried out studies to establish an effective monitoring system through coordination and cooperation with other agencies in the provinces. It is planned to extend these units and institutionalize them, with a view to establish sustainable child labour monitoring systems at local levels. The Government also provides information on the numerous measures it is taking to strengthen the functioning of the education system, including measures to improve the quality of education, to raise awareness concerning the importance of education, to increase the school enrolment rates of girls and to decrease the number of drop-outs.</p>	<p>Country</p> <p>Country</p>	<p>Specified risk on child labour in agriculture (including forestry?)</p> <p>Low risk on child labour</p>
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	<p>The Committee notes the Government’s indication that a child labour force survey was conducted by the Turkish Statistical Institute in 2012. This survey revealed an increase in the number of children aged 6 to 14 years who are in child labour, and indicated that 2.5 per cent of children between 6 and 14 years of age were found to be engaged in work. The Committee also notes that the Committee on the Rights of the Child, in its concluding observations of 20 July 2012, took note of the substantial progress made by the Government in developing policies, programmes and action plans to prevent child labour, but noted that the large number of children still employed constituted a significant challenge to the rights of the child, including the right to education (CRC/C/TUR/CO/2-3, paragraph 62).</p> <p>While taking note of the measures taken by the Government, the Committee notes with concern the rise, in recent years, of the number of children below the minimum age of 15 years engaged in child labour in the country. The Committee therefore urges the Government to strengthen its efforts to ensure the elimination of child labour. It requests the Government to continue to provide information on the measures taken in this regard, including measures to establish child labour monitoring systems, as well as the results achieved. It also requests the Government to continue to provide statistical information on the number of children under the minimum age engaged in child labour in the country.”</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3172502:NO Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Minimum Age Convention, 1973 (No. 138) – Turkey This report contains no information that indicates a ‘specified risk’.</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3172652:NO Observation (CEACR) - adopted 2014, published 104th ILC session (2015) Worst Forms of Child Labour Convention, 1999 (No. 182) – Turkey “Article 7(2) of the Convention. Effective and time-bound measures. Clause (b). Necessary and appropriate direct assistance for the removal of children from the worst forms of child labour and for their rehabilitation and social integration. Children working in the agricultural sector. In its previous comments, the Committee noted the statement by TÜRK-İŞ that one of the most important sectors in which children are engaged in hazardous work is seasonal agricultural work. However, it noted that the Government was implementing a project which included measures to reduce child labour in seasonal agricultural work and promote access to education. The Committee notes the statement of TÜRK-İŞ that children are involved in hazelnut harvesting in very poor conditions. It notes the Government’s statement that children working in agriculture are one of the target groups of</p>	Country	Specified risk on child labour
	Country	Specified risk on child labour	
	Country	Specified risk on child labour in agriculture (including forestry?)	

	<p>the Time Bound Programme for the Prevention of Child Labour and that it is implementing the Action Plan to keep children out of plantations in nut growing provinces. It also notes the Government's collaboration with ILO-IPEC on a project to reduce child labour in seasonal commercial agriculture in hazelnut production in Ordu. The Committee further notes that the Committee on the Rights of the Child (CRC), in its concluding observations of 20 July 2012, noted that there remained a large number of children still employed, particularly in seasonal agriculture (CRC/C/TUR/CO/2-3, paragraph 62). <i>The Committee urges the Government to pursue and strengthen its efforts to ensure that children under 18 years of age are not engaged in hazardous work in the agricultural sector, particularly in seasonal agricultural work and the nut harvest. It requests the Government to continue to provide information on the measures taken in this regard, as well as the results achieved.</i>"</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3172649:NO</p> <p><i>Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Worst Forms of Child Labour Convention, 1999 (No. 182) - Turkey</i></p> <p>"Article 3 of the Convention. Worst forms of child labour. Clause (a). All forms of slavery or practices similar to slavery. Sale and trafficking of children. In its previous comments, the Committee noted that, according to the indications of the International Trade Union Confederation (ITUC), Turkey is a country of transit and destination for trafficked children, who are forced into prostitution and debt bondage. The Committee noted the information from the Office of the Attorney-General that in 2010 there was between 50–90 child victims of trafficking. Sixteen persons responsible for trafficking involving victims under 18 years of age were found guilty and convicted in 2009, and five in 2010. The Committee notes the Government's statement in its report that between 1 June 2011 and 31 January 2013, 97 foreign nationals were identified as victims of human trafficking, but that none of the recorded victims were children. The Government also indicates that it is taking measures to combat trafficking within the framework of the Second National Action Plan to Combat Trafficking. <i>The Committee requests the Government to pursue its efforts to ensure that those responsible for the trafficking of children under 18 years of age, as well as complicit law enforcement officers, are prosecuted and that sufficiently effective and dissuasive sanctions are applied in practice.</i></p> <p>Articles 3(d) and 4(1). Hazardous work and excluded categories of work. In its previous comments, the Committee noted that Decree No. 25425 of April 2004 on the fundamentals and principles of the employment of children and young workers contains a list of hazardous types of work prohibited for persons under 18 years of age. It also noted that, under the terms of section 4 of the Labour Act, several categories of workers are excluded from its scope of application including workers in businesses with fewer than 50 employees or</p>	Country	Specified risk on child labour and forced labour
		Country	Low risk on child labour

	<p>carrying out agricultural and forestry work, building work in relation to agriculture within the limits of the family economy and domestic service. The Committee notes the adoption of the Occupational Health and Safety Law, and notes the Government's statement that this Law applies to all workers, including those excluded from the Labour Code. It notes that section 10 of the Law specifies that, when conducting a risk assessment of a place of work, the situation of young workers shall be considered. The Committee also notes the Government's statement that Decree No. 25425 was amended in 2013 by Decree No. 28566. The annexes of Decree No. 28566 specify the occupations in which children are allowed to be employed. The Government indicates that it is not permitted to employ young persons in work other than the types of work listed, including ten types of light work, 27 types of work permitted for young persons between the ages of 15–18, and an additional 11 types of work permitted for children between the ages of 16–18. <i>The Committee requests the Government to provide information on the application in practice of Decree No. 25425, as amended by Decree No. 28566, with regard to protecting children under 18 from engagement in hazardous work. The Committee also requests the Government to indicate whether Decree No. 25425, as amended, applies to those sectors excluded from the scope of application of the Labour Code.</i> Article 7(2). Effective and time-bound measures. Clause (b). Necessary and appropriate direct assistance for the removal of children from the worst forms of child labour and for their rehabilitation and social integration. Children working in the furniture sector and other industrial sectors. <i>The Committee previously noted the results of a survey on the worst forms of child labour indicating that children continued to be engaged in work in the furniture industry in some provinces. However, it noted the Government's indication that it had undertaken a number of inspections in the furniture industry, and that as a result, hazardous and arduous types of work were no longer performed by children and young workers in this sector. The Committee notes the statement in the communication from the Confederation of Turkish Trade Unions (TÜRK-İŞ) that the worst forms of child labour continue to exist in the furniture sector in practice.</i> The Committee notes that the annexes of Decree No. 25425, as amended by Decree No. 28566, specifying the only permissible types of work for children under 18, do not contain any work in furniture making or the furniture industry. The Committee, therefore, observes that the Decree appears to prohibit the engagement of children under 18 in work in this sector. <i>It, accordingly, requests the Government to provide information on the measures taken to enforce this prohibition in practice, including information on any specialized inspections undertaken in the furniture sector. Taking into account the results of the survey indicating that children continued to engage in hazardous work in this sector, it also requests the Government to supply information on measures taken to provide services for the rehabilitation and social reintegration for children removed from hazardous work in this sector.</i>"</p>	Country	Specified risk on child labour in furniture sector.
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<p>ILO Declaration on Fundamental Principles and Rights at Work. Country reports. http://www.ilo.org/declaration/lang--en/index.htm Source of several reports. Search for 'racial discrimination', 'child labour', 'forced labour', 'gender equality', 'freedom of association'</p>	<p>http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_375796.pdf INTERNATIONAL LABOUR OFFICE Governing Body <i>Report of the Committee on Freedom of Association</i> 375th Report of the Committee on Freedom of Association CASE NO. 3098 (Page 122) INTERIM REPORT Complaint against the Government of Turkey presented by – the Turkish Motor Workers’ Union (TÜMTIS) – the International Transport Workers’ Federation (ITF) and – the International Trade Union Confederation (ITUC) “A. The complainants’ allegations 535. In their communication dated 7 August 2014, the complainant organizations – TÜMTIS, ITF and ITUC – allege illegal arrests, detentions and prosecution of several trade union leaders for engaging in trade union activities and abusive use of criminal law to suppress independent trade unionism.”</p> <p>http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_357167.pdf INTERNATIONAL LABOUR OFFICE Governing Body <i>Report of the Committee on Freedom of Association</i> 374th Report of the Committee on Freedom of Association CASE NO. 3084 (page 207) REPORT IN WHICH THE COMMITTEE REQUESTS TO BE KEPT INFORMED OF DEVELOPMENTS Complaint against the Government of Turkey presented by the Kristal-Is (Trade Union of Glass, Cement and Soil Workers of Turkey) supported by the IndustriALL Global Union “Allegations: The complainant organization alleges that section 63 of Act No. 6356, which allows the Government to suspend a strike by way of a decree and to impose a compulsory arbitration, in general, and the Government’s Decree No. 2014/6524 of 27 June 2014, which suspended a strike in the glass industry for a period of 60 days on grounds of public health and national security, in particular, are not in conformity with Conventions Nos 87 and 98.”</p>	<p>Country</p> <p>Country</p>	<p>Specified risk for the right to freedom of association</p> <p>Specified risk for the right to freedom of association</p>
<p>ILO Child Labour Country Dashboard: http://www.ilo.org/ipec/Regionsandcountries/lang--en/index.htm</p>	<p>No additional information found.</p>	<p>-</p>	<p>-</p>
<p>Global March Against Child Labour: http://www.globalmarch.org/</p>	<p>http://www.globalmarch.org/content/starting-girls-empower-rural-communities-end-hunger-and-poverty</p>		

	<p>Starting With The Girls To Empower Rural Communities To End Hunger And Poverty</p> <p>“08 March 2012: The Global March Against Child Labour is using International Women’s Day to bring spotlight on the girls in rural communities working as child labourers and missing out on an education.</p> <p>Amina is nine years old and for the last two years she has been working picking peanuts with her parents in the north of Turkey. She has three younger brothers and an older sister who stays at home to look after their mother. Their mother is disabled and cannot walk. Their father died two years ago. Amina works from 7 in the morning until 6 in the evening. She is given one main meal and one snack a day. Amina used to go to school but now her family depends on her wage. She misses her school friends and is too tired to see them when she goes home. She was able to read and write but now she has forgotten most of what she learned.”</p> <p>No evidence found that indicates ‘specified risk’ on child labour in forestry.</p>	<p>North of Turkey</p> <p>Country</p>	<p>Specified risk on child labour in agriculture</p> <p>Low risk on child labour in forestry</p>
<p>Office of the United Nations High Commissioner for Human Rights (OHCHR), Committee on Rights of the Child: http://www.ohchr.org/EN/HRBodies/CRC/Pages/CRCIndex.aspx</p>	<p>http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRC%2fC%2fTUR%2fCO%2f2-3&Lang=en</p> <p><i>Committee on the Rights of the Child</i> 22 July 2012 <i>Consideration of reports submitted by States parties under article 44 of the Convention</i> <i>Concluding observations: Turkey</i></p> <p>III. Main areas of concern and recommendations</p> <p>“Economic exploitation, including child labour</p> <p>62. The Committee takes note of the substantial progress made by the State party in developing research, policies, programmes and action plans to prevent child labour and eliminate the worst forms of child labour, as well as the significant decline in child labour in the State party. It however notes that while the prevalence of child labour has declined, the large number of children still employed, particularly in seasonal agriculture, constitutes a significant challenge to the rights of the child, including the right to education. While noting that the minimum age for employment is 15 years and the recent changes to the Law on Education have increased the years of compulsory education to 12 years, the Committee is concerned that the minimum age of employment is lower than the age when children will normally complete compulsory education.</p> <p>63. The Committee encourages the State party to take all measures to combat child labour and eliminate the worst forms of child labour. It recommends that the State party ensure that children are protected from social and economic exploitation, including by bringing its legislation on the minimum age of employment into conformity with the age when children normally complete compulsory education as well as with the regulation on employment</p>	<p>Country</p> <p>Country</p> <p>Country</p>	<p>Low risk on child labour</p> <p>Specified risk on child labour, particularly agriculture</p> <p>Specified risk on child labour</p>

	<i>of children in hazardous conditions, in compliance with International Labour Organization (ILO) Convention No. 182 (1999) concerning the prohibition and immediate action for the elimination of the worst forms of child labour. The Committee recommends that the State party seek technical assistance from the ILO's International Programme on the Elimination of Child Labour (IPEC) in this regard. The Committee encourages the State party to ratify ILO Convention No. 189 (2011) concerning decent work for domestic workers."</i>		
Office of the United Nations High Commissioner for Human Rights (OHCHR), Committee on the Elimination of Discrimination against Women http://www.ohchr.org/en/hrbodies/cedaw/pages/cedawindex.aspx (Use the link to 'Key documents' on the left hand side. Go to "observations' and search for country.)	http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CEDAW%2fC%2fTUR%2fCO%2f7&Lang=en <i>Committee on the Elimination of Discrimination against Women</i> 25 July 2016. <i>Concluding observations on the seventh periodic report of Turkey*</i> C. Principal areas of concern and recommendations "Employment 45. The Committee notes with concern that the employment rate of women remains particularly low, and that housework is disproportionately carried out by women. It is furthermore concerned about: (a) The higher rate of unemployment among women than among men, especially among young women; (b) The persistent gender wage gap in the public sector and elsewhere; (c) The significant number of women working in low-paid jobs in the informal sector in precarious conditions and without access to health insurance or social security. 46. <i>The Committee recommends that the State party:</i> (a) <i>Implement the action plan on women's employment;</i> (b) <i>Adopt policies and specific legislative measures to eliminate employment discrimination against women and work towards ensuring equal opportunities at all levels for women in the labour market, in the formal sector and elsewhere;</i> (c) <i>Develop job evaluation systems based on gender-sensitive criteria, with the aim of closing the existing gender wage gap in line with the Committee's general recommendation No. 13 (1989) on equal remuneration for work of equal value;</i> (d) <i>Introduce statutory minimum wages applicable to all sectors of the labour market in order to raise salaries in female-dominated sectors, and take all other measures to guarantee a living wage."</i>	Country	Low risk for discrimination of women at the workplace
Human Rights Watch: http://www.hrw.org/	No information found that indicates 'specified risk' on HRW website. https://www.hrw.org/world-report/2016 <i>World Report 2016</i> No information found that indicates 'specified risk'.	Country	Low risk
		Country	Low risk

<p>Child Labour Index 2014 produced by Maplecroft. http://maplecroft.com/portfolio/new-analysis/2013/10/15/child-labour-risks-increase-china-and-russia-most-progress-shown-south-america-maplecroft-index/</p>	<p>Turkey is categorized as 'high risk' on the Child Labour Index 2014 (latest available year). The index has four categories: low, medium, high and extreme risk.</p>	<p>Country</p>	<p>Specified risk on child labour</p>
<p>http://www.verite.org/Commodities/Timber (useful, specific on timber)</p>	<p>This specific site is not active anymore. http://knowledge.verite.org/#/map Turkey is included in this search function of this website and is included in commodity reports on <i>nuts</i> and <i>citrus</i>.</p>	<p>- Country</p>	<p>- Low risk on forced labour in forest sector</p>
<p>The 2015 ITUC Global Rights Index ranks 141 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. The Survey provides information on violations of the rights to freedom of association, collective bargaining and strike as defined by ILO Conventions, in particular ILO Convention Nos. 87 and 98 as well as jurisprudence developed by the ILO supervisory mechanisms. There are 5 ratings with 1 being the best rating and 5 being the worst rating a country could get. http://www.ituc-csi.org/new-ituc-global-rights-index-the?lang=en</p>	<p>Turkey is classified in the category 5: "No guarantee of rights" "• Countries with the rating of 5 are the worst countries in the world to work in. While the legislation may spell out certain rights workers have effectively no access to these rights and are therefore exposed to autocratic regimes and unfair labour practices." http://survey.ituc-csi.org/Turkey.html#tabs-2 This site publishes a legal analysis. It lists 22 regulations in Turkey that limit either (i) the <i>Freedom of association / Right to organize</i> such as "Anti-Union discrimination" and "Barriers to the establishment of organisations", (ii) the <i>Right to collective bargaining</i>, such as "Barriers to the recognition of collective bargaining agents" or (iii) the <i>Right to strike</i>. http://survey.ituc-csi.org/Turkey.html#tabs-3 This site reports an almost countless number of cases since 2010, each presenting a violation of a certain aspect of workers' rights. For example: "The General Directorate of Mineral Research and Exploration (MTA) prevented the Energy, Industry and Mining public sector union ESM from displaying posters condemning the 10 October massacre in Ankara and from handing out of leaflets about it." (10-10-2015) "On 3 August 2015 Mr. Sinan Ok, a representative of the office workers' union (BES), was arrested when police attacked a march organised by KESK about collective bargaining negotiations in front of the Ministry of Labour and Social Security in Ankara. Mr. İlhan Yiğit, the KESK Secretary for Training, Organisation and Media was also arrested." (19-05-2015) "Hugo Boss fired Meryem Bicakci in March 2016 because she supported the Teksif trade union organising at her factory. It was another sacking in a long-running union-busting campaign by the luxury fashion label at its largest production facility in Izmir, Turkey. Management also increased pressure on</p>	<p>Country Country Country Country Country</p>	<p>Specified risk for violation of workers' rights Specified risk for violation of workers' rights Specified risk for violation of workers' rights Specified risk for violation of workers' rights Specified risk for violation of</p>


	<p>two other leading union members, Fikri Mutlu and Murat Akgün. They had already seen other colleagues facing threats, intimidation and ultimately dismissal for their union activities.” (26-03-2016)</p> <p>“Mehmet Kaplan, a sanitation worker employed by the Cizre Municipality and a member of DiSK/Genel-İş Union, and father of three, was shot in front of his house on 17 January 2016 by Turkish security forces deployed to surround towns in the south of the country. His family could not remove his body from the street because of the curfew imposed.” (06-01-2016)</p> <p>“On 8 April 2015 the management of TÜVTÜRK, a consortium which operates over 200 vehicle inspection centres and employs 3,000 workers nationwide dismissed 51 members of the TÜMTİS union. The grounds for dismissal were supposedly that their performance levels had ‘decreased’ or that they ‘had refused overtime’, although there was little to substantiate these claims. The real explanation appeared to be that they were all active members of the union that had gained recognition as the representative union at the two new plants where the workers were dismissed TEM Kocaeli and Osmaniye, and that wanted to negotiate a collective agreement. Management brought in workers from other plants to replace the dismissed workers, and began intimidating other workers to persuade them to leave the union.” (18-04-2015)</p>	Country	workers’ rights
		Country	Specified risk for violation of workers’ rights
		Country	Specified risk for violation of workers’ rights
Gender wage gap (in OECD countries) http://www.oecd.org/gender/data/genderwagegap.htm	Turkey’s gender wage gap in 2014 (latest available year) was 20.06 per cent. The OECD average was 15.46 per cent.	Country	Specified risk on gender wage discrimination
World Economic Forum: Global Gender Gap Index 2016 http://reports.weforum.org/global-gender-gap-report-2016/the-global-gender-gap-report-2016/ Search for country profiles.	http://reports.weforum.org/global-gender-gap-report-2016/economies/#economy=TUR Turkey ranks no. 130 out of 144 countries for the overall Gender Gap Index 2016 with a score of 0.623. Turkey ranks no. 129 for the more specific sub-index on Economic participation and opportunity out of the 144 countries that were included. Within that index, the most specific and most relevant indicator is the Wage equality for similar work . Here, Turkey ranks no. 98 out 144 countries the with a score of 0.59.	Country	Specified risk on gender wage discrimination
use, if applicable: http://www.ilo.org/global/publications/books/WCMS_324678/lang-en/index.htm <i>Global Wage Report 2014/15</i>	Turkey does not feature in this section of this report.	-	-

<p>"The Global Wage Report 2014/15 analyses the evolution of real wages around the world, giving a unique picture of wage trends and relative purchasing power globally and by region."</p>			
<p>Google the terms '[country]' and one of following terms 'violation of labour rights', 'child labour', 'forced labour', 'slave labour', 'discrimination', 'gender pay/wage gap, 'violation of labour union rights' 'violation of freedom of association and collective bargaining'</p>	<p>http://www.truth-out.org/news/item/17084-turkey-needs-a-labor-rights-spring Truthout <i>Turkey Needs a "Labor Rights Spring"</i> 19 June 2013 By John Logan, Truthout News Analysis</p> <p>"The anti-government protests in Istanbul, Ankara and Izmir, and the brutal response of Turkish riot police, have brought global attention to the authoritarian tendencies of Prime Minister Erdoğan's Justice and Development Party (AKP) government. Since first winning power in 2002, the Erdoğan government has also exercised significant repression in the area of workers' rights. It has limited the rights to organize and strike, and allowed companies, including European multinationals, to violate workers' rights with virtual impunity.</p> <p><i>Union repression has been the norm in modern Turkey</i> Turkey has repeatedly restricted labor rights in recent times. Indeed, with the exception of brief periods in the 1960s and 1970s, the systematic repression of independent unions has been a constant theme in the 100-year history of the Turkish Republic. Repression of unions and strikes followed the military coups of 1960, 1971, and 1980, and even after the return to civilian rule, the government placed severe restrictions on workers' right to organize. Under 1983 labor legislation - a product of the 1980 coup that stayed in place until late 2012 - unions were required to win majority support at the workplace and demonstrate that they represented at least 10 percent of all the workers in their respective economic sector.</p> <p>As a result of these repressive policies and practices, union membership has fallen more in Turkey in the past decade than in any other Organization for Economic Co-operation and Development (OECD) country. At below 6 percent - and approximately 3.5 percent in the private sector - union membership is now lower in Turkey than in any other OECD country.</p> <p>The AKP has also intensified the neoliberal employment policies of previous governments. Precarious and flexible work arrangements are now the norm for millions of Turks. Employers frequently use subcontracting, which now affects over 1 million jobs, as a tactic to undermine unionization campaigns. In its quest to promote growth, the AKP government has stressed the country's low wages and has willingly sacrificed labor rights in its quest for more foreign direct investment. As a result of the AKP's economic policies, about half the working population earns close to the minimum wage, now 978 Turkish Lira (about \$521) per month, which is considered significantly below an adequate living wage."</p>	<p>Country</p>	<p>Specified risk for violation of workers' rights</p>
		<p>Country</p>	<p>Specified risk for violation of workers' rights</p>

	<p><i>Employer anti-unionism is endemic</i></p> <p>“In the private sector, the current situation for unions is dire. Employer violations of workers’ rights are endemic. Employers routinely harass and intimidate workers who try to form unions. They fire union activists, retaliate against union members in the workplace, pressure workers to resign from the union and interfere with the free choice of non-union-members. While these tactics are unlawful, they usually go completely unpunished.</p> <p>Some anti-union tactics adopted by Turkish employers will sound familiar to observers of American labor relations. First, union activists are frequently sacked or threatened with dismissal for their union activities. Second, the penalties against unfair dismissals are weak and do not act as a deterrent against unlawful behavior - employers are ordered to reinstate workers but can choose to avoid reinstatement by paying a minimal amount of compensation. Third, union members often experience discrimination within the workplace - they are denied promotions and pay raises and are transferred to less desirable positions which limit their contact with other employees. Fourth, non-union employees are exposed to aggressive anti-union propaganda, including mandatory captive audience speeches and one-on-one meetings between employees and their supervisors.</p> <p>The termination of workers for union activities is a widespread problem in Turkey. The International Trade Union Confederation has found that more workers are fired for union activities in Turkey than in any other country in Europe, while one of Turkey’s leading union officials explains that “to be a union activist in Turkey is the same thing as being unemployed. And being unemployed is the same as being poor.” As economic insecurity has increased for many workers, so too has their fear of getting fired for union activities.”</p> <p>http://article.sapub.org/10.5923.j.sociology.20160602.01.html</p> <p>Scientific and Academic Publishing <i>American Journal of Sociological Research</i> p-ISSN: 2166-5443 e-ISSN: 2166-5451 2016; 6(2): 43-48 doi:10.5923/j.sociology.20160602.01</p> <p><i>Violations of Trade Union Rights: Case Studies from Turkey in 2000s</i></p> <p>“Abstract</p> <p>This study examines the violations of trade union rights that occurred in Turkey from 2000 to 2015 with respect to the principle of indivisibility of trade union rights. This principle is based on the idea that trade union rights should encompass collective action rights, i.e., the rights to collective bargaining and to strike to increase the effectiveness and functionality of unions seeking protection and also improvement in the economical and social rights of their members. Every year, trade union rights are violated in different ways. Even in the early 21th century, we witness a significant increase in violations in the form of human rights abuse. Furthermore, these violations are not only</p>	Country	Specified risk for violation of workers’ rights
		Country	Specified risk for violation of

	<p>physical but also psychological and thus demonstrate the inefficiency of relevant legal regulations. Trade union rights constitute a crucial part of international labor law. Therefore, in this study, violations of trade union rights in Turkey will be examined in light of the reports of Annual Survey of Trade Union Rights published by the International Trade Union Confederation.”</p> <p>http://www.bbc.com/news/business-37716463 BBC News <i>Child refugees in Turkey making clothes for UK shops</i> 24 October 2016 “Syrian refugee children have been making clothes for British shoppers, an undercover BBC investigation has found. Panorama investigated factories in Turkey and found children had been working on clothes for Marks and Spencer and the online retailer Asos. Adult refugees were also found working illegally on Zara and Mango jeans. All the brands say they carefully monitor their supply chains and do not tolerate the exploitation of refugees or children.”</p> <p>http://www.cbsnews.com/news/refugee-children-forced-into-labor-in-turkey/ CBS Evening News 22 September 2015 <i>Refugee children forced into labor in Turkey</i> “The European Union on Tuesday approved a quota system for relocating 120,000 refugees across the continent. It's just a fraction of those who have surged into Europe to escape war and poverty -- many from Syria. In a basement in Istanbul, a textile factory hums with activity -- staffed almost entirely with Syrian children. Filming with a hidden camera, CBS News found workshop after workshop in Turkey's biggest city -- all using Syrian refugees -- some as young as 10. One boy said he came from war torn Aleppo. He's now safe from barrel bombs and terrorists -- but not from exploitation. Syria's nightmarish civil war has driven millions of people from their homes -- including more than 2 million who fled across the border to Turkey. But poverty has compelled many refugee families to send their children to work -- turning their sons and daughters into breadwinners.”</p> <p>http://www.economics-ejournal.org/economics/discussionpapers/2015-56/file Economics; The open-access, open-assessment E-Journal <i>Discussion Paper</i> No. 2015-56 August 13, 2015 <i>Male-female Labor Market Participation and the Extent of Gender-based Wage Discrimination in Turkey</i> <i>Conclusions</i></p>	<p>Country</p> <p>Country</p>	<p>workers' rights</p> <p>Specified risk on child labour</p> <p>Specified risk on child labour</p>
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	<p>“The OB decompositions show that a significant portion of the gender pay gap in Turkey is indeed attributable to pay discrimination. Alternative methods and estimations display that between 57.28 and 64.97 percents of the gender earnings gap is due to discrimination against women. The JMP decompositions, on the other hand, reveal that pay discrimination is more evident among the upper income groups. However, women in the upper end of the earnings distribution have generally higher levels of education. Thus, despite suffering from discrimination, women in the upper income quantiles can mitigate the effects of discrimination to some extent via their unobserved skills and pecuniary market returns to these skills. Along these lines, one can argue that Blau and Kahn (1997)’s idea of “swimming upstream against rising income inequality” holds in Turkey to some extent.</p> <p>The JMP decomposition of the changes in the male-female earnings differentials between 2003 and 2010 reveals that differentials in wage-determining characteristics have lessened over time in favor of women, but that rate of returns to wage-determining endowments of men have risen which may have increased the gender gap between the two years. The finding that pay discrimination has increased over time is consistent with the results of the OB decompositions of 2003 and 2010 earnings regressions.</p> <p>The results of our study are in general aligned with the previous research on pay discrimination in Turkey. Even though pay discrimination based on gender is banned by laws in Turkey, our study and other reveal that enforcement seems to be insufficient.”</p> <p>http://www.sciencedirect.com/science/article/pii/S016517651200211X Science Direct <i>Economics Letters</i> <i>Volume 117, Issue 1, October 2012, Pages 32–34</i> <i>New evidence on pay gap between men and women in Turkey</i> “Abstract This paper studies gender wage differentials between men and women in Turkey. I find that the estimated wage gap between men and women in Turkey is almost entirely explained by labor market discrimination toward women.”</p>	Country	Specified risk on gender wage discrimination
Additional general sources	Additional specific sources		
US Department of Labour Bureau Of International Labor Affairs	<p>https://www.dol.gov/agencies/ilab/resources/reports/child-labor/turkey Child Labor and Forced Labor Reports: Turkey “Moderate advancement In 2015, Turkey made a moderate advancement in efforts to eliminate the worst forms of child labor. The Government implemented a project in cooperation with the ILO that provided services to more than 1,000 children working in commercial hazelnut production and amended the Labor Law to provide protections for children working in the arts and commercial advertising. However, children in Turkey are engaged in child labor in street work and mobile seasonal work in agriculture. The Government does not have laws that</p>	Country	Specified risk on child labour

	<p>protect children working in agricultural enterprises employing fewer than 50 workers. Although the Government took important steps to increase Syrian refugee children's access to education and other services nationwide, many Syrian refugee children in urban areas of Turkey had low or no access to education and other social services, leaving significant numbers at increased risk of exploitation in the worst forms of child labor."</p> 	Country	Low risk on forced labour
From national CW RA	Not available	Country	Low risk on child labour in forest sector
<p>Conclusion on Indicator 2.2:</p> <ul style="list-style-type: none"> While Turkey has signed all 8 Core Conventions of the ILO, not all social rights are covered by the relevant legislation. This goes especially for trade union rights like freedom of association and collective bargaining are not upheld in Turkey. Advancements have been made in many legislative areas. There is evidence that laws and regulations are not always strongly enforced although there seems to be advancement on most aspects. Workers' rights and trade union rights like freedom of association and collective bargaining are not upheld in Turkey. The ITUC classifies Turkey in the category "No guarantee of rights" and presents an analysis of legal short-comings as well as a list with a very high number of violations of workers' rights in the recent years. There is evidence that Turkey is a destination and transit country for trafficked women, men and children but there is no evidence, direct or indirect, of compulsory or forced labour in the forest sector. There is evidence confirming the abuse of child labour in many economic sectors. This practice appears to continue despite positive changes in policies and practices by the Turkish government. While there is evidence pointing to child labour in certain, specific sectors, there is no evidence, direct or indirect, of child labour in the forest sector. There is some evidence of discrimination of religious and ethnic minorities in Turkey but there is no evidence of this discrimination in respect of employment and/or occupation. There is, however, evidence of discrimination of women at the workplace leading to a gender pay gap (gender wage discrimination). This discrimination is structural in Turkey and it therefore includes the forest sector. <p>With regard to freedom of association and right to collective bargaining and gender wage discrimination 'Specified risk' threshold 15 applies:</p>		Country	<p>Specified risk for rights to freedom of association and to collective bargaining and on gender wage discrimination</p> <p>Low risk on child labour, forced labour and other forms of discrimination</p>

(15) There is substantial evidence of widespread violation of key provisions of the ILO Fundamental Principles and Rights at work.

With regard to child labour, forced labour and all other forms of discrimination 'Low risk' threshold 10 applies:
 (10) Applicable legislation for the area under assessment covers the key principles recognized in the ILO Fundamental Principles and Rights at work (which are recognized as: freedom of association and right to collective bargaining; elimination of forced and compulsory labour; eliminations of discrimination in respect of employment and occupation; and effective abolition of child labour), AND the risk assessment for relevant indicators of Category 1 confirms enforcement of applicable legislation.

Indicator 2.3. The rights of Indigenous and Traditional Peoples are upheld.

Guidance:

- Are there Indigenous Peoples (IP), and/or Traditional Peoples (TP) present in the area under assessment?
- Are the regulations included in the ILO Convention 169 and is UNDRIP enforced in the area concerned? (refer to category 1)
- Is there evidence of violations of legal and customary rights of IP/TP?
- Are there any conflicts of substantial magnitude [footnote 6] pertaining to the rights of Indigenous and/or Traditional Peoples and/or local communities with traditional rights?
- Are there any recognized laws and/or regulations and/or processes in place to resolve conflicts of substantial magnitude pertaining to TP or IP rights and/or communities with traditional rights?
- What evidence can demonstrate the enforcement of the laws and regulations identified above? (refer to category 1)
- Is the conflict resolution broadly accepted by affected stakeholders as being fair and equitable?

general sources from FSC-PRO-60-002a V1-0 EN	information found and specific sources	scale of risk assessment	risk indication
ILO Core Conventions Database http://www.ilo.org/dyn/normlex/en/f?p=1000:11001::NO - ILO Convention 169	http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102893 Turkey has not ratified ILO Convention 169.	Country	Specified risk
Survival International: http://www.survivalinternational.org/	No information found on IPs/TPs in Turkey.	Country	Low risk
Human Rights Watch: http://www.hrw.org/	No information found on IPs/TPs in Turkey. https://www.hrw.org/world-report/2016 World Report 2016 Does not contain information on IPs/TPs in Turkey.	Country	Low risk
Amnesty International http://amnesty.org	No information found on indigenous peoples in Turkey. https://www.amnesty.org/en/latest/research/2016/02/annual-report-201516/ State of the Human Rights Report 2015/16 Does not contain information on IPs/TPs in Turkey.	Country	Low risk
The Indigenous World http://www.iwgia.org/regions	Does not contain information on IPs/TPs in Turkey.	Country	Low risk
United Nations Special Rapporteur on the rights of indigenous peoples	No information found that the Special Rapporteur did any investigation into Turkey.	-	-

http://www.ohchr.org/en/issues/ipeoples/srindigenoupeoples/pages/sripeoplesindex.aspx			
<p>UN Human Rights Council Universal Periodic Review http://www.ohchr.org/EN/HRBodies/UPR/Pages/Documentation.aspx</p>	<p>https://documents-dds-ny.un.org/doc/UNDOC/GEN/G15/076/33/PDF/G1507633.pdf?OpenElement (or at: http://www.refworld.org/docid/557172914.html) <i>Report of the Working Group on the Universal Periodic Review: Turkey</i> 13 April 2015 This report makes no reference to indigenous peoples in Turkey.</p> <p>https://documents-dds-ny.un.org/doc/UNDOC/GEN/G14/191/56/PDF/G1419156.pdf?OpenElement <i>Summary prepared by the Office of the United Nations High Commissioner for Human Rights in accordance with paragraph 15 (c) of the annex to Human Rights Council resolution 5/1 and paragraph 5 of the annex to Council resolution 16/21: Turkey* (Summary of stakeholders information)</i> 27 October 2014</p> <p><i>Information provided by stakeholders</i> C. Implementation of international human rights obligations, taking into account applicable international humanitarian law 10. Minorities and indigenous peoples “62. HRW and ECLJ urged Turkey to end discrimination against the Alevi Muslim minority by legally recognizing their meeting houses (cemevi) as places of worship.115 ECLJ called on the Working Group to inquire about the number of churches and places of worship which have been confiscated and address religious minorities’ ability to raise their children according to their own religious and moral beliefs.116 JC, JS12 and CSW observed that despite the secularism affirmed by Turkey’s constitution, non-Muslim religious communities are severely discriminated against and denied legal status and recognition as religions.117 CSW urged Turkey to implement effective constitutional and legislative reform so as to curb discrimination of religious minorities and ensure their treatment is commensurate with international obligations to which Turkey is party. CSW recommended Turkey to proactively accommodate non-Muslim minorities and address their socioeconomic concerns; promote inter-faith harmony and understanding in order to change societal perceptions of and hostility towards non-Muslim communities.118 63. JS12 stated that Assyrian Christians are indigenous people and they have not been able to open new church since Turkey’s pre-Republic era, and denied to train clergy. They recommended removal of all bureaucratic and administrative obstacles preventing nonMuslims from freely opening places of worship.119”</p>	<p>Country</p> <p>Country</p> <p>Country</p>	<p>Low risk</p> <p>Low risk (no IP presence)</p> <p>Low risk (no IP presence: submission referring to IP identity comes from</p>

	<p>“JS12 Joint submission 12 submitted by: Assyrian Universal Alliance – Americas Chapter (AUA Americas) and the Assyrian Advocacy Group (AAG) Campbell (United States of America).”</p> <p>“64. LLG noted that accessing education in mother tongue in the public school system for Kurds and other minority groups is still prevented.120 ERT noted that Turkey accepted the recommendation on the use of languages and in September 2013, a package of democratic reforms was announced, aimed at improving the situation for the Kurdish minority. ERT recommended removing restrictions on the use of languages other than Turkish in political and public life and provide opportunities for teaching of minorities’ languages.121”</p>	Country (esp. Kurdistan)	Assyrians in America) Low risk (no IP presence)
<p>UN Human Rights Committee http://www.ohchr.org/EN/HRBodies/CCPR/Pages/CCPRIndex.aspx search for country Also check: UN Committee on the Elimination of All Forms of Racial Discrimination http://www.ohchr.org/EN/HRBodies/CERD/Pages/CERDIndex.aspx</p>	<p>http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2fTUR%2fCO%2f1&Lang=en <i>International Covenant on Civil and Political Rights</i> Human Rights Committee <i>Concluding observations on the initial report of Turkey adopted by the Committee at its 106th session (15 October - 2 November 2012)</i> 13 November 2012 This document makes no reference to indigenous peoples.</p> <p>http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CERD%2fC%2fTUR%2fCO%2f4-6&Lang=en <i>International Convention on the Elimination of All Forms of Racial Discrimination</i> Committee on the Elimination of Racial Discrimination <i>Concluding observations on the combined fourth to sixth periodic reports of Turkey*</i> 11 January 2016 This document makes no reference to indigenous peoples.</p>	Country Country	Low risk Low risk
Intercontinental Cry http://intercontinentalcry.org/	No information found on IPs/TPs in Turkey.	Country	Low risk
Forest Peoples Programme: www.forestpeoples.org FPP’s focus is on Africa, Asia/Pacific and South and Central America.	Turkey does not feature on this website.	Country	Low risk
Society for Threatened Peoples: http://www.gfbv.de/index.php?change_lang=english	No information found on IPs/TPs in Turkey.	Country	Low risk
Regional human rights courts and commissions: - Inter-American Court of Human Rights http://www.corteidh.or.cr/index.php/en - Inter-American Commission on Human Rights http://www.oas.org/en/iachr/ http://www.oas.org/en/iachr/indigenous/ - African Commission on Human and Peoples’ Rights - African Court on Human and Peoples’ Rights - European Court of Human Rights	- http://www.echr.coe.int/Pages/home.aspx?p=home European Court of Human Rights A large number of references to Turkey could be found in the Court’s case-law but no references to human rights issues with indigenous peoples could be found. This does not mean, however, that there is no information because a complete search is not possible within this assessment and outsiders have limited access to the search engine. See for example: http://www.echr.coe.int/Documents/CLIN_INDEX_2016_ENG.pdf	-	-

Data provided by National Indigenous Peoples', Traditional Peoples organizations;	No additional information found (see below)	-	-
Data provided by Governmental institutions in charge of Indigenous Peoples affairs;	No information found	-	-
Data provided by National NGOs; NGO documentation of cases of IP and TP conflicts (historic or ongoing);	No information found	-	-
National land bureau tenure records, maps, titles and registration (Google)	No additional information found (see below)	-	-
Relevant census data	No additional information found (see below)	-	-
- Evidence of participation in decision making: (See info on implementing ILO 169 and protests against new laws) - Evidence of IPs refusing to participate (e.g. on the basis of an unfair process, etc.); (See info on implementing ILO 169 and protests against new laws)	No additional information found (see below)	-	-
National/regional records of claims on lands, negotiations in progress or concluded etc.	No additional information found (see below)	-	-
Cases of IP and TP conflicts (historic or ongoing).) Data about land use conflicts, and disputes (historical / outstanding grievances and legal disputes)	No additional information found (see below)	-	-
Social Responsibility Contracts (<i>Cahier des Charges</i>) established according to FPIC (Free Prior Informed Consent) principles where available	Not applicable	-	-
Google the terms '[country]' and one of following terms 'indigenous peoples organizations', 'traditional peoples organizations', 'land registration office', 'land office', 'indigenous peoples', 'traditional peoples', '[name of IPs]', 'indigenous peoples+conflict', 'indigenous peoples+land rights'	http://www.refworld.org/docid/4954ce3fc.html <i>World Directory of Minorities and Indigenous Peoples - Turkey</i> <i>Publisher: Minority Rights Group International</i> <i>Publication Date November 2011</i> History "Turkey within its present border was established in 1923, following the Ottoman defeat in 1918, and from 1919 until 1922, and bitter wars against mainly Greek, French and Armenian attempts to implement Allied plans to dismember Anatolia. Nationalist Turks successfully appealed to Kurds to assist them in the name of the Muslim fatherland, a cause which had great appeal in view of the Armenian Christian threat in eastern Anatolia. The Treaty of Sèvres, 1920, which the Allies had failed to impose on Turkey, had allowed for the creation of a Kurdish state, but at a time when Muslim Anatolia was under threat few Kurds were interested in independence under Allied (Christian) auspices. However, in 1923 Turkey began to formulate its position on minorities. It agreed a population exchange whereby almost all Orthodox Christians in Turkey were transferred to Greece in return for Greece's (non-Albanian)		

	<p>Europe, this aim has only partially been fulfilled. Among conservative citizens of the republic, the status of women is still determined by traditional social values. The state also made items of Western dress compulsory and replaced Ottoman Arabic with a variant of Latin script for written Turkish.</p> <p>The state saw religious sentiment as one of the greatest threats to its aims. It therefore took direct control of formal Islamic institutions and also proscribed the populist Sufi brotherhood (tarikats) networks, executing religious leaders who defied state will, but were unable to destroy the tarikats once they had gone underground.</p> <p>Well over 150,000 Bulgarian Turks arrived mainly during the mass expulsion 1950-1. They were deliberately scattered over western and central Turkey to integrate them into the Turkish population but they remained readily identifiable. Another estimated 300,000 arrived in 1989, escaping a forced assimilation campaign in Bulgaria, of whom half subsequently returned.</p> <p>Peoples Turkey's key minority groups include ethnic, linguistic and religious minorities. The number of people in each group is unknown since the state does not ask citizens to declare their ethnic, religious or other origin in censuses. There is no scientific research on minorities in Turkey. The list below is non-exhaustive; it includes the main minority groups, irrespective of whether they self-identify as 'minorities', and non-conclusive information about each. The quantitative estimates below should be read with caution.</p> <p>Main ethnicities: Caucasians, (Y) Ezidis, Kurds, Laz, Roma, Turks</p> <p>Main languages: Arabic, Kirmanji and Zaza Kurdish, Laz and Turkish - the only official language.</p> <p>Main religions: Alevism, Armenian, Assyrian and Greek (Rum) Christianity, (Sunni) Islam and Judaism.</p> <p>Officially, the government still only recognizes Armenians, Jews and Rum Christians as minorities (see below), but as used in Turkey, this term denotes clear second-class status.”</p> <p>http://www.refworld.org/docid/49749c9837.html World Directory of Minorities and Indigenous Peoples - Turkey : Assyrians Publication Date: 2008 (Although this publication date is outdated for this assessment it gives a rare historical overview.) “Also called Syrian Orthodox Christians or Syriacs, the language and practices of Assyrians originated in early Christianity.</p>	<p>Country</p> <p>Country</p> <p>South-East Turkey (provinces Mardin and Hakkari)</p>	<p>No assessment (context information)</p> <p>No assessment (context information)</p> <p>Low risk (no IP presence)</p>
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	<p>Their historical homeland in Turkey is in the provinces of Mardin and Hakkari in the south-east. Around 95 per cent of Assyrians in this region have left Turkey because of persecution and displacement. A 1995 study estimates the number of remaining Assyrians to be around 15 000, the majority of whom live in Istanbul and around 2000-3000 of whom live in the south-east.</p> <p>Assyrians belong to the same ethnicity and speak the same language (Assyrian). They are divided into four main groups based on differences of theological interpretation and denomination. The Assyrian Orthodox community in Turkey has four metropolits: Turabdin, Mardin, Adiyaman and Istanbul. Their patriarchate is in Damascus, Syria. The Deputy Patriarch of Assyrian Catholics is also in Istanbul; their patriarchate is in Lebanon.</p> <p>The Unrepresented Nations and Peoples Organisation (UNPO) estimates that from 1915-1918, around 750,000 Assyrians Christians were killed after a fatwa was declared against them, and this impacted directly on the dispersal of the community across the Middle East, especially to Iraq where a strong Assyrian community already existed. Further dispersal has continued as the community has experienced waves of persecution.”</p> <p>http://www.refworld.org/docid/49749c9623.html <i>World Directory of Minorities and Indigenous Peoples - Turkey : Kurds</i> <i>Publication Date: 2008</i></p> <p>“Kurds are the largest ethnic and linguistic minority in Turkey. The estimated numbers claimed by various sources range from 10 to 23 per cent of the population. According to the 1965 national census, those who declared Kurdish as their mother tongue or second language constituted around 7.5 per cent of the population. However, for reasons indicated above, it is possible that this figure was under-inclusive at the time. Kurds speak Kurdish, which is divided into Kurmanci, Zaza and other dialects. The majority are Sunni Muslims, while a significant number are Alevis. Historically concentrated in eastern and south-eastern region of the country, where they constitute the overwhelming majority, large numbers have immigrated to urban areas in western Turkey. Kurdish tribes enjoyed virtual autonomy until the last years of the Ottoman Empire.</p> <p>Fearful of the Armenian threat during the First World War, they cooperated in Turkey's genocide of one million Armenians, only to find themselves the target of forcible assimilation in the 1920s and 1930s.</p> <p>From the late 1950s, Kurdish immigration was initially voluntary and economic. But repeated Kurdish rebellions were suppressed with ruthlessness, bordering on genocide. All Kurdish expression was outlawed.</p> <p>A few Kurds began to call for recognition in the 1960s, and a growing number identified with the Turkish left in the 1970s. In 1984 Kurdish nationalism found violent expression in the PKK (Kurdistan Workers Party), which embarked on a guerrilla war against the state.</p> <p>(..)</p>	<p>Eastern and south-eastern region</p>	<p>Low risk (no IP presence)</p>
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	<p>With the outbreak of armed conflict in 1984 between the Turkish army and the Kurdistan Workers' Party (Partiya Karkerên Kurdistan, PKK), more than 1 million Kurds were forcibly evicted from rural and urban areas in eastern and south-eastern Turkey. The displaced settled in urban centres in the region as well as towns in western and southern Turkey, and many fled to Europe. By 1996 the state only retained control of south-east Turkey through the forced evacuation of over 3,000 Kurdish villages, consequently causing the destitution of 3 million people, with widespread and routine arrests and arbitrary torture common.</p> <p>The Kurdish struggle for cultural and political rights is complicated by social and religious factors. Many rural Kurds are primarily motivated by clan or tribal loyalty, with long-standing local conflicts reflected in support for rival political parties at national level. Inter-tribal politics can determine whether support will be given to the PKK or government forces. Loyalties are also determined by religious sentiment. Possibly up to 25 per cent of Kurds in the southeast are still primarily motivated by religious affiliation. Many still accept tarikat guidance (voluntary Islamic social welfare organisations that provide guidance and aid for Muslims. They have ancient mystic and traditional roots in Turkey,) when it comes to voting. This has benefited religious parties and parties of the right. The southeast remains underdeveloped compared with the western half of the country.</p> <p>The use of minority languages in people's names was prohibited until recent years, which was particularly detrimental for Muslim minorities. (..)</p> <p>As a large, unrecognized minority, Kurds continue to face systematic marginalization. Around 30,000 people have been killed in fighting between the Turkish military and the Kurdish Workers Party (PKK) since 1984, and over one million people remain displaced in heavily Kurdish south-eastern Turkey. The government continues to conflate any effort to promote Kurdish rights with support for 'PKK terrorists'."</p> <p>http://www.refworld.org/docid/49749c98c.html <i>World Directory of Minorities and Indigenous Peoples - Turkey : Caferis</i> <i>Publication Date: 2008</i></p> <p>"According to Caferis themselves, the Caferi presence in Turkey is a result of the fact that their historical homeland in the province of Igadir was transferred from Russia to Turkey when the borders of the latter were drawn. Most Caferis are ethnically Azerbaijani Turks. However, they define themselves primarily as a religious group belonging to Shi'a Islam. According to the information provided by a former Minister of Culture in Turkey, the number of Caferis is around 3 million. Caferider, the national organization of Caferis, endorses this figure. As a result of economic immigration since the 1980s, the highest number of Caferis - around 500,000 - live in Istanbul. The lack of a vibrant economy and the resulting hardships in Igadir has also led to waves of international migration to Europe.</p>	Territories in which Caferis live	Low risk (no IP presence)
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	<p>As with Alevis and other non Sunni Muslims in Turkey, Caferis are subject to the restrictions of the Treaty of Lausanne. This ignores different denominations of Islam and amounts to lack of formal recognition of the Caferi's (and other minorities') distinct religious identity. While the state allocates substantial funds to provide religious services for Sunni Muslims: to pay the salaries of imams, construct mosques and oversee pilgrimage, it does not provide any funding to non-Sunni Muslims. Furthermore, the religious affairs of all Muslims are subjugated to state control through the Diyanet (see above Alevi section). Alevis and Caferis are not permitted to have representation in this institution.”</p> <p>http://www.refworld.org/docid/49749c9950.html <i>World Directory of Minorities and Indigenous Peoples - Turkey : Alevis</i> <i>Publication Date: 2008</i> “Alevi is the term used for a large number of heterodox Muslim Shi'a communities with different characteristics. Thus, Alevis constitute the largest religious minority in Turkey. Technically they fall under the Shi'a denomination of Islam, yet they follow a fundamentally different interpretation than the Shi'a communities in other countries. They also differ considerably from the Sunni Muslim majority in their practice and interpretation of Islam.”</p> <p>“The number of Alevis is a matter of contention. Estimates range from around 10 per cent to as much as 40 per cent of the total population.”</p> <p>“The vast majority of Alevis are probably of Kizilbash or Bektashi origin, two groups subscribing to virtually the same system of beliefs but separately organized. The Alevis (Kizilbash) are traditionally predominantly rural and acquire identity by parentage. Bektashis, however, are predominantly urban, and formally claim that membership is open to any Muslim.”</p> <p>“Linguistically, they consist of four groups: Azerbaijani Turkish, Arabic, Turkish and Kurdish (both Kurmanci and Zaza). The last two categories constitute the largest Alevi groups. Politically, Kurdish Alevis have faced the dilemma of whether their prior loyalty should be to their ethnic or religious community. Some care more about religious solidarity with Turkish Alevis than ethnic solidarity with Kurds, particularly since many Sunni Kurds deplore them. Some fear such tensions may lead to new ethno-religious conflict.”</p> <p>“Alevi and Bektashi beliefs are presumed to have their origins in Central Asian Turkmen culture. However, they are likely to have absorbed Christian beliefs when Byzantine peasantry moved into the Alevi faith during the Turkic conquest of Anatolia during the tenth and eleventh centuries, and Iranian pre-</p>	Country	Low risk (no IP presence)
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	<p>Islamic ideas, since kizilbash beliefs derived from the founders of the Iranian Safavid dynasty.”</p> <p>“Isolated within what became Sunni Ottoman territory, Alevis have always been reviled as non-Muslims of dubious loyalty, victims of scurrilous libels. To avoid persecution, Alevis practice taqiyya (dissimulation). Many Alevis celebrate the life of the sixteenth-century saint, Pir Sultan Abdal, a symbol for community cooperation and opposition to injustice.”</p> <p>“Until the present century Alevis survived by living in remote areas. Hopes of faring better under a secular republic failed to take account of popular prejudice. With conscription and the drift to towns in search of work, Alevis, especially Kurds, have increasingly been exposed to Sunni prejudice and animosity.” (..)</p> <p>http://www.refworld.org/docid/49749c99c.html <i>World Directory of Minorities and Indigenous Peoples - Turkey : Armenians</i> <i>Publication Date: 2008</i></p> <p>“Armenians are among the ancient people of Anatolia. The majority of Armenians in Turkey today belong to the Orthodox Church, while there are also a few Catholic and Protestant Armenians. Their number was around 2 million during the Ottoman Empire. Today, slightly more than 60,000 remain. Of these, around 60,000 are Orthodox, 50,000 of whom live in Istanbul, around 2,000 are Catholic and a small number are Protestant. Officially, the government recognizes Armenians as minorities but as used in Turkey, this term denotes second-class status.”</p> <p>“Catholic Armenians have an archbishop in Istanbul and their spiritual leader is the Roman Catholic Church in Rome. The Orthodox community has its own Patriarchate in Istanbul. Armenians run private schools providing primary and secondary education in their mother tongue.”</p> <p>“Many Armenians were killed in Ottoman pogroms against the Armenians in 1894-5 and the genocide of 1915. The Christian communities in Turkey have their rights guaranteed by international law under Articles 38-44 of the Lausanne Treaty of 1923, and, unlike Muslim minorities, have been officially recognized as minorities. But although the state respects their minority status, they are regarded as foreigners by most Turks even though they have inhabited the land of modern Turkey for well over 2,000 years, substantially longer than the Turks.”</p> <p>“Armenians find it hard to register their children as Armenian. However, the community successfully operates its own schools, old peoples homes and its own press, although at times there has been pressure by the authorities to</p>	Country	Low risk (no IP presence)
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	<p>Ezidis were affected in the armed conflict between the Turkish armed forces and the PKK during 1984-99, when masses of civilians were displaced from their homes in eastern and south-eastern Turkey. Consensus between NGOs, a parliamentary commission and the Hacettepe survey (commissioned by the government) is that the security forces were responsible for many of the evictions. Alongside Assyrians, Arabs and Kurds, Ezidi IDPs have suffered lack of just compensation, not granted the right to return until 1999, limited aid for reconstruction of homes, and lack of adequate education on what restitution is available to them.</p> <p>The number of Ezidis who have emigrated from Kars and Agri in eastern Turkey to large cities in the west, as well as the remaining Ezidis in central Turkey and southern provinces of Maras and Antep, is unknown. In recent years, Ezidis have been returning to their historical homelands in small numbers.”</p> <p>http://www.wca-ngo.org/heritage/287-aramians-as-indigenous-people-of-southeast-turkey</p> <p>World Council of Arameans (WCA) <i>Arameans as Indigenous People of Southeast Turkey</i> <i>“The uncompromising premise of the World Council of Arameans (Syriacs) is that the Aramean (Syriac) people and their Aramaic language are native to Southeast Turkey. Their historical presence in this region spans more than 3,000 years.</i> <i>While we respect Turkey’s territorial integrity, we do believe that this Republic ought to recognize and appreciate the Aramean people and their cultural heritage as an enrichment to its nation. And in keeping with international law, standards and values, its Government should keenly support the Aramean people in safeguarding, developing and promoting their Aramaic cultural heritage.</i> <i>There is a variety of conclusive evidence to substantiate the ancient presence of the Arameans and their language in Tur ‘Abdin, which is Aramaic for “the mountain of the servants [of God]” and an erstwhile densely populated Christian region in Southeast Turkey. A few examples from the writings of independent scholars will be cited to illustrate this undisputed fact:</i></p> <p>“In the early Byzantine period and the first centuries of Islam, Tūr ‘Abdīn was probably inhabited almost entirely by Christian Arameans. Later, more and more Muslims (mainly Kurds) settled there.” The increase of the Kurdish population in this region occurred in the previous centuries, especially in the last one.¹</p> <p>“The area around the Tūr ‘Abdīn remained a main centre of speakers of Aramaic through centuries, and it is no hazard that Nusaybin and Mardin, to</p>	<p>South-East Turkey</p> <p>Tur ‘Abdin (South-East Turkey)</p>	<p>IP presence</p> <p>IP presence</p>
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the south of the mountain, and Amida, to its north, were later important centres of the earliest Christian literature in Aramaic.”²

Regarding Beth Zamani, an Aramean city-state in the early first millennium B.C., it is widely known that “its capital city was then Amida, modern Diyarbakır.”³

“Tur ‘Abdin has a history of one and a half millennia before the conversion of its Aramean inhabitants to Christianity and is mentioned in several Assyrian records, such as Adadnari I (1305-1274) and Salmanassar I (1274-1244), in which wine regions, especially the good wine of the Mount Izala, a name still used for the southern part of Tur ‘Abdin, is mentioned.”⁴

Palmer rightly deduced from the Assyrian annals: “Not only are several of the village names still in use, even these types of farming and the same skill in metalwork are characteristic of the ancient Aramaic stock of Christians who are the hereditary inhabitants of the [Tur ‘Abdin] plateau.”⁵

“This confirms a certain continuity, if not a direct descent, between the Aramaean world, and the Syriac world, and the Church that would bear that name.” ⁶”

The World Council of Arameans (Syriacs) ("WCA")

“Established in 1983, the World Council of Arameans (Syriacs) (“WCA”), formerly known as the Syriac Universal Alliance, is a global umbrella organization representing the various Aramaic (Syriac) national federations in the continents of Europe, America, Australia and the Middle East.

The WCA is the widely acknowledged voice of the Aramean (Syriac) people whose interests and needs it aims to serve, defend and promote.

Since 1999, the WCA is the only Aramaic-speaking Non-Governmental Organization in Special Consultative Status with the Economic and the Social Council of the United Nations. This privileged position meant that the WCA could send delegates to the UN Headquarters in New York (UNHQ) and to its Offices in Vienna (UNOV) and Geneva (UNOG).

Ever since, the WCA has attended various conferences and meetings in these cities, where human rights, the rights of indigenous peoples, crime prevention, human trafficking, drugs control and more are all on the international agenda. The UNOG is the political arena where one can inform the world about the Aramean people, their precarious situation and lack of socio-political and cultural rights in the homeland. Hence the WCA's main focus for activities are especially in Geneva and New York. One of the noteworthy achievements at

UNOG was the presentation of The Hidden Pearl (23 July 2003) in one of the conference rooms. It was successfully organized by Arameans from the USA, Australia and five European countries.

Another big project of the WCA and its Member Federations is Suryoyo Sat (www.suryoyosat.com). This satellite channel exists since 2006. (..)"

"These two basic qualifications, in addition to its multifarious activities, place the WCA in a leading role with the global Aramean (Syriac) community. Among others, the WCA seeks close cooperation with national governments, the United Nations, the European Union and the Council of Europe.

The WCA is dedicated to answer the call to protect and secure the rights, liberty and equality of the Aramean people, safeguard and promote the cultural heritage of its ancestors, ensuring justice, and uniting all its people as a self-determined and internationally recognized Aramean nation.

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<http://www.wca-ngo.org/heritage/247-the-indigenous-origins-of-the-aramians-of-upper-mesopotamia>

The Indigenous Origins of the Arameans of Upper Mesopotamia

"[...]With regard to the false description of "camel nomads," there exists no evidence and perhaps it was projected upon the Arameans with the ancient and modern Arabs (and Bedouins) in mind.¹⁰ "In point of fact," Schniedewind noted, "the characterization of the early Arameans as 'nomads' is dubious. Rather, the early Arameans were semi-nomadic pastoralists."¹¹ [...] Thus, the alleged Aramean intrusion into these lands is built upon a faulty assumption and it is far more likely that "they were the West Semitic-speaking peoples who had lived in that area throughout the second millennium [B.C.], some as pastoralists and some in villages, towns, and cities."¹⁵

	<p>Concerning the area that largely corresponds to modern-day northeast Syria, Sader concluded: "The pastoralist Aramaeans cannot be seen anymore as 'invaders' bursting out of the Syro- Arabian 'desert', but rather as the pastoral element, an inherent part of Late Bronze Age [circa 1550-1200 B.C.] Syrian society."¹⁶ McClellan, although disagreeing with Sader on a few minor issues, also concurs that "there is little evidence for [an] outside invasion."¹⁷</p> <p>The Arameans of old, who were ubiquitous in the northern regions of Upper Mesopotamia, can thus be regarded as the indigenous inhabitants of Upper Mesopotamia and northeast Syria. From north to south, the major Aramean polities in northern Mesopotamia were Beth-Zamani, Beth-Bahiani, Beth-Halupe and Laqu.¹⁸</p> <p>To the best of my knowledge, there is no specialist who will deny the Aramean descent of the present-day Aramaic-speaking Christians of these areas. As a matter of fact, in his book on Tur-'Abdin,¹⁹ the Aramaic name of a Christian enclave in Southeast-Turkey, Palmer rightly deduced from the Neo-Assyrian annals: "Not only are several of the village names still in use, even these types of farming and the same skill in metalwork are characteristic of the ancient Aramaic stock of Christians who are the hereditary inhabitants of the plateau."²⁰ "This confirms," corroborated another scholar, "a certain continuity, if not a direct descent, between the Aramaean world, and the Syriac world, and the Church that would bear that name."²¹</p> <p>These past decades have witnessed another reality, namely, that of a state-sponsored policy which intends to Turkify all the antique Aramaic names of the towns and the villages.²² Consequently, in the near future this process will have obliterated an essential part of the ancient-old Aramean civilization in Upper Mesopotamia and thus end its continuity."</p> <p>http://www.americanthinker.com/articles/2012/05/the_rights_of_indigenous_people_and_the_rest_of_us.html</p> <p>American Thinker <i>May 11, 2012</i> <i>By Shoshana Bryen</i> <i>The Rights of Indigenous People and the Rest of Us</i> "The Kurds form a tribal/national grouping that spans Iraq, Iran, Turkey, and Syria. They are unquestionably an "indigenous people" with a distinct language and culture. Is the United States prepared to support border changes to allow them the right of self-determination? American lives were expended in the quest for a unitary Iraq, and we supported Turkey's determination not to allow Kurds to secede during the PKK war. But how can we deny the Kurds while supporting a Palestinian "right to self determination"?"</p>	<p>Upper Mesopotamia (South-East Turkey)</p> <p>Upper Mesopotamia (South-East Turkey)</p> <p>Kurdish territory</p>	<p>Presence of IPs (Arameans)</p> <p>Specified risk for rights of IPs</p> <p>Low risk (regardless this claim, Kurds are no IPs following the FSC definition (see above))</p>
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Additional general sources for 2.3	Additional specific sources	scale of risk assessment	risk indication
<p>FSC® Glossary of Terms</p>	<p>https://ca.fsc.org/preview.fsc-glossary-of-terms-fsc-std-01-002.a-833.pdf FSC® Glossary of Terms - FSC-STD-01-002 - Updated: 07 April 2016</p> <p>Indigenous Peoples: People and groups of people that can be identified or characterized as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The key characteristic or criterion is self-identification as Indigenous Peoples at the individual level and acceptance by the community as their member <input type="checkbox"/> Historical continuity with pre-colonial and/or pre-settler societies <input type="checkbox"/> Strong link to territories and surrounding natural resources <input type="checkbox"/> Distinct social, economic or political systems <input type="checkbox"/> Distinct language, culture and beliefs <input type="checkbox"/> Form non-dominant groups of society <input type="checkbox"/> Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities. <p>(Source: Adapted from United Nations Permanent Forum on Indigenous Issues, Factsheet 'Who are Indigenous Peoples' October 2007; United Nations Development Group, 'Guidelines on Indigenous Peoples' Issues' United Nations 2009, United Nations Declaration on the Rights of Indigenous Peoples, 13 September 2007). Source: FSC-STD-01-001 V5-2</p>		
From national CW RA	Not available	-	-
<p>Conclusion on Indicator 2.3:</p> <p>The Aramean people can be considered as indigenous peoples in Turkey. There are several other minorities in Turkey but none of them fits the FSC definitions for IPs or TPs. The Arameans are the only group that self-identifies as "indigenous" through the World Council of Arameans which is hosted in the Netherlands and Sweden, but claims to represent the various Aramaic (Syriac) national federations in the continents of Europe, America, Australia and the Middle East. From the information, they present about their history and culture it can be concluded that they fulfil the definition of FSC on indigenous peoples and that the precautionary principle should be applied.</p> <p>No legislation was found that protects the rights of indigenous peoples in Turkey.</p> <p>Therefore, the following 'specified risk' threshold applies:</p> <p>(23) The presence of IP and/or TP is confirmed or likely within the area. The applicable legislation for the area under assessment contradicts indicator requirement(s).</p>		South-East Turkey	Specified risk

Controlled wood category 3: Wood from forests in which high conservation values are threatened by management activities

Overview

Forest Cover and Forest Types in Turkey

About 4,000 years ago, the temperate forests of Turkey covered 50 million hectares, corresponding to 60-70% of the land area. Due to over-grazing, over-cutting, and clearance for agriculture, forest areas have decreased to 22.3 million hectares, corresponding to 28.6 % of the total land area of Turkey as of 2015. This, combined with the low regeneration capacity of forests due to low precipitation and dry climatic conditions, has in certain parts of Turkey, especially the central and eastern Anatolian regions, left the land as steppe. Today, more than 90% of the remaining forests in Turkey are natural in origin (Davis, 1965-1988; Çolak and Rotherham, 2006). Turkey's forests consist of 54% coniferous, 35% broad-leaved and 11% mixed forests (Figure 1).

Turkish forest classification is based on the primary floristic regions dependent on the main climatic conditions (Zohary, 1973; Atalay, 1994). Extending throughout the northern part of Turkey is the Euro-Siberian floristic region. Humid-temperate broad-leaved forests exist in the northern aspects at low altitudes, and humid/sub-humid and winter-tolerating coniferous forests at higher altitudes. In Thrace, oak and beech forests dominate. In the central part, fir, black pine, scots pine and beech make up the main part of the forests. In the eastern region, the main forest trees are spruce, fir, scots pine and beech. The Mediterranean floristic region, defined by the Mediterranean climate, stretches throughout the western and southern coastal regions of Turkey, extending towards inner parts through mountain ranges. Turkish pine and maquis vegetation covers coastal parts up to 1,200 metres in elevation. Mostly coniferous forests, composed of cedar, black pine and juniper, dominate the higher altitudes with oaks. The Irano-Turanian floristic region covers central, eastern and south-eastern Turkey, characterised by low precipitation and considerable temperature differences between summer and winter. Forests composed mainly of oak, black pine and juniper are scarce, and are found at the edge of the plains and in tectonic depressions (GDF, 2014a; Kaya and Raynal, 2001).

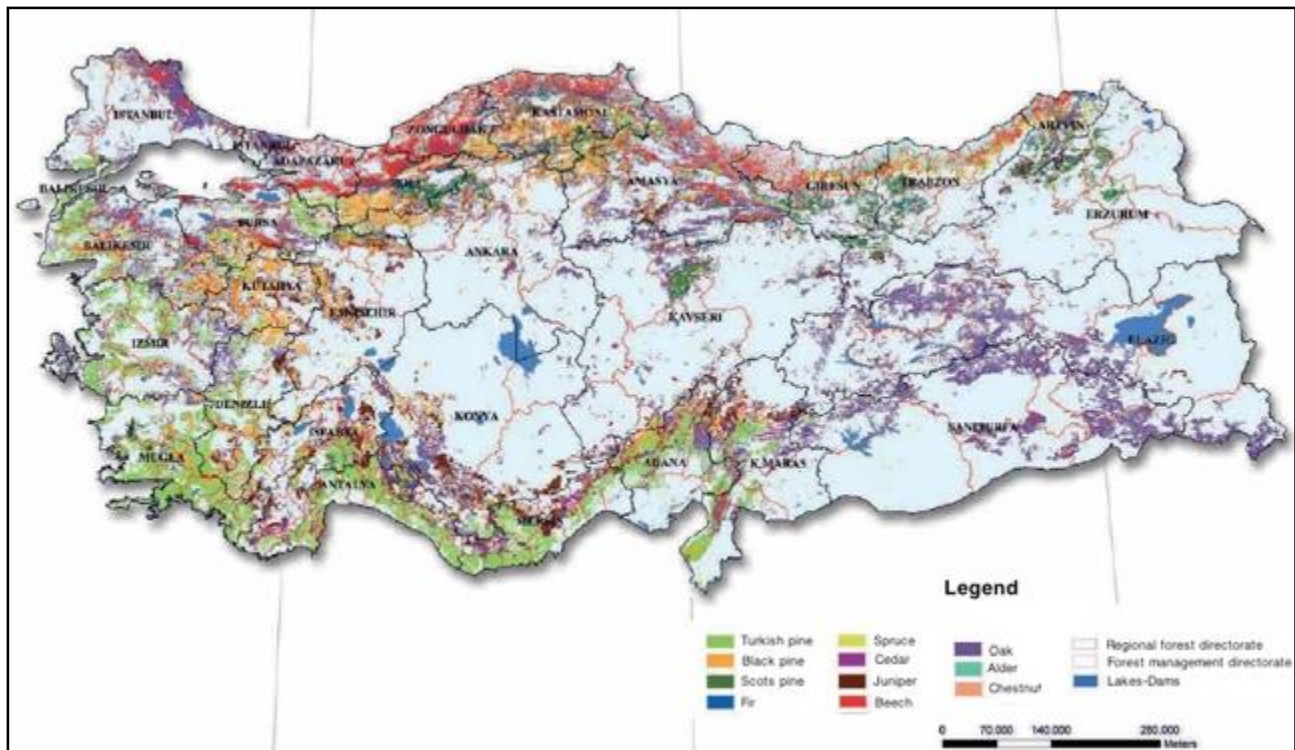


Figure 1. Distribution of major forest trees in Turkey (GDF, 2013)

Ownership, Management and Planning of Forests

In Turkey, 99% of forests are owned and managed by the state, and the remaining area (22,000 hectares) is owned privately (GDF, 2012). The governmental body responsible for management of forests is the General Directorate of Forestry (referred to hereafter as the GDF), which is a division of the Ministry of Forestry and Water Affairs. Before the new forest regulation passed in 2008, forest management plans used to focus almost entirely on timber production. New forest management plans now designate three main functions to forests: economic, ecological, and socio-cultural. The GDF has been conducting collaborative projects with national and international forest agencies, universities and NGOs to develop approaches and methodologies for assigning functions to forests and to perform relevant management schemes. Management of forests has been undertaken according to forest management plans, which are renewed every 10-20 years. These plans are made for each Forest Management Unit separately, and there are currently 1,403 Forest Management Units in Turkey. These units are grouped geographically into 243 forest management directorates, which are themselves organised into 28 Regional Forest Directorates (GDF, 2015a).

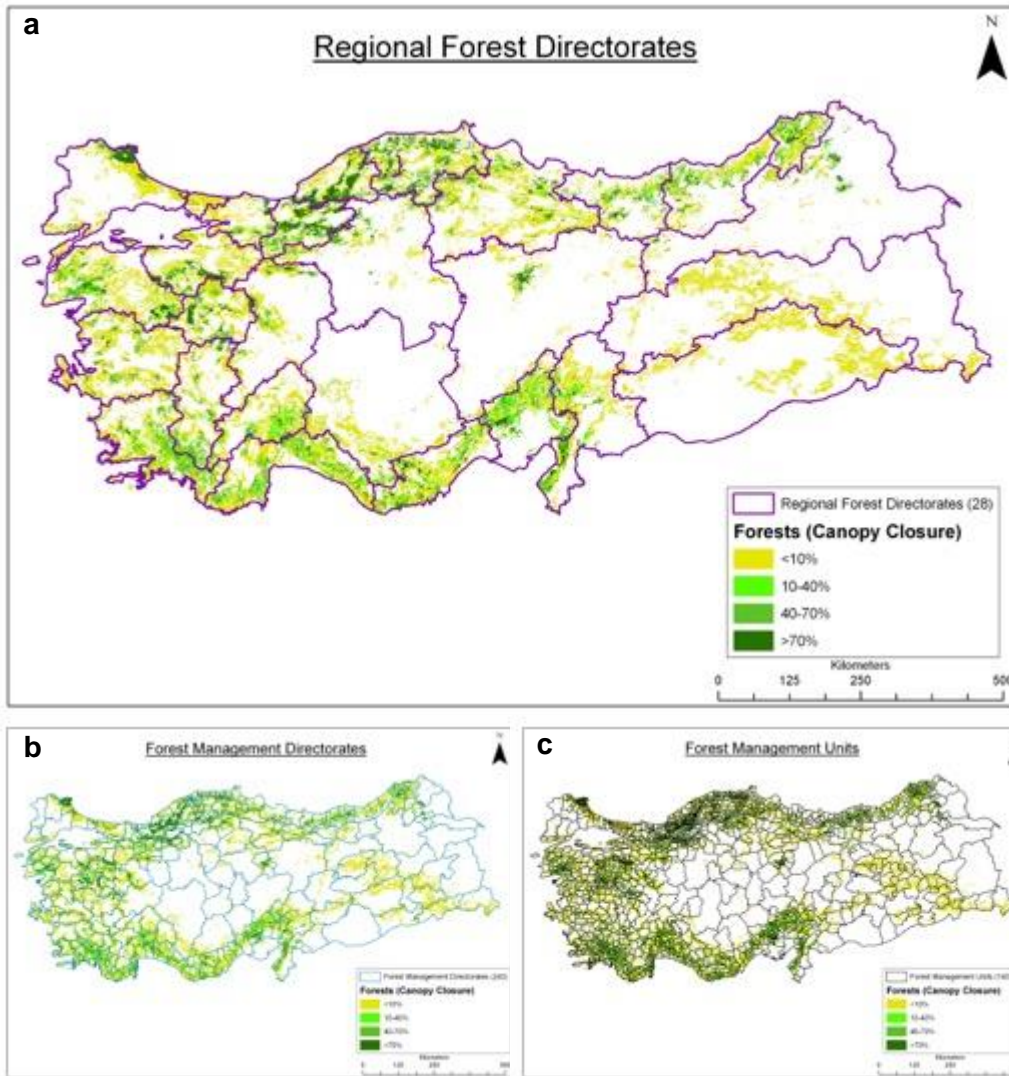


Figure 2. Distribution of Turkish forests and the regional administrative structure of the General Directorate of Forestry: a) 28 Regional Forest Directorates, b) 243 Forest Management Directorates, and c) 1,403 Forest Management Units (data from GDF, 2015a).

As of 2015, 11.2 million hectares of forest area are designated as production forests under economic function, 9.3 million hectares as limited or no production forests under ecological function, and 1.8 million hectares as limited or no production forests under socio-cultural function.

Besides timber production, planning and management of non-timber forest products (NTFP) is also done by the GDF. Within the GDF is a Department of Non-Timber Forest Products and Services, which is responsible for the inventory, planning and management of NTFPs. The NTFP Department works in collaboration with the Department of Forest Management and Planning. The documented production of NTFPs in Turkey has increased from 120,000 tonnes in 2011 to 350,000 tonnes in 2015. Almost half of this production is honey and chestnuts (GDF, 2015c). Other NTFP products/species include laurel, thyme, rosemary, sage, linden, sweetgum, pine nuts, carob, blueberries, Galanthus spp., Geranium spp., rose hip, resin, erica, moss, Buxus spp., etc. Statistics on all of the products produced, production amounts and locations are available for the period 1998-2015 (GDF, 2015b). Starting in 2013, the GDF has begun to make management plans for each species. Every year more species are included in their programmes. The GDF believes that there is great potential in NTFPs, and that managing their production sustainably will benefit local people.

The GDF classifies Turkish forests into two main categories: canopy closure and origin. Forests with a canopy closure of more than 10% are regarded as productive or 'normal' forests, and forest areas with less than 10% canopy closure as 'degraded' forests (the classified areas are forest stands, which are 10 hectares on average, within management plans). Within the second category, origin, forest planners recognise high forests and coppice forests. These categories play an important role in management decisions. For instance, 'degraded' forests are regarded as such due to their low timber production, and plans are made to 'rehabilitate' these forest areas to increase forest cover. Among such areas are tall Mediterranean maquis forests with less than 70% closure or glades and larger forest openings, which provide important habitat for species (Table 1.) (Traditionally, maquis have been regarded as 'secondary vegetation' by foresters, who assume Turkish pine (*Pinus brutia*) to be the original vegetation. In the recent forest planning regulations document, No: 299 (GDF, 2014b) maquis shall be classified as a forest type, but this classification has not yet been widely applied in forest planning).

Table 1. Distribution of forests according to the two main classification schemes of the GDF (GDF, 2015a)

	Productive (ha.)	Degraded (ha.)	Total
High Forest (ha.)	11,900,000	7,700,000	19,600,000
Coppices (ha.)	800,000	1,900,000	2,700,000
Total	12,700,000	9,600,000	22,300,000

Three methods of timber harvest planning are used in Turkish forestry: even-aged forest management, selective cutting, and coppices. Selective cutting management can be applied only in forests of shade tolerant tree species such as beech, fir and spruce. In such forests, foresters aim to reach an 'optimal' mix of age classes, which provides a sustainable harvest. In even-aged forestry, rotation periods are determined by the dominant forest tree (i.e. ~40 years for Turkish pine) of the forest stand and a natural or artificial regeneration is performed at the end of this period. Coppice forests are mainly of oak and beech, which are cut/pruned periodically to obtain firewood.

Natural forests are those found in National Parks, Nature Conservation Areas, Nature Monuments, Nature Parks, Wildlife Conservation Areas, Special Environmental Protection Areas and Natural Sites. These different types of protected areas are governed by different governmental institutions. National Parks, Nature Conservation Areas, Nature Monuments, Nature Parks and Wildlife Conservation Areas are protected areas planned and managed by the Directorate of Nature Protection and National Parks (DNP). Natural Sites and Special Environmental Protection Areas are protected areas under the responsibility of the Ministry of Environment and Urbanisation (MEU). Protection Forests, Gene Conservation Forests and Seed Stands are managed by the General Directorate of Forestry (GDF); no timber or NTFP production takes place in these areas. (The regulation on Protection Forests, Gene Conservation Forests and Seed Stands allows for some timber production through tending or regeneration, establishment of roads, recreation areas etc. However, such operations are either not being done, or are performed to a very limited extent in practice (See table 2) (DNP, 2013, 2015; CBD, 2014))

Table 2. Terrestrial protected areas (excluding wetland areas) in Turkey: Types, numbers and responsible agencies (DNP, 2013, 2015; CBD, 2014)

Status	Number	Total Area (ha.)	Forest Area (ha.)	Timber Production	Responsible Agency
National Parks	40	828,614	333,103	No*	DNP
Nature Conservation Areas	31	64,224	18,918	No	DNP
Nature Monuments	112	6,993	550	No	DNP
Nature Parks	204	99,394	35,893	No*	DNP
Wildlife Conservation Areas	80	1,191,340	566,236	No*	DNP
Special Environmental Protection Areas	15	1,336,000	135,638	No*	MEU
Natural Sites	1273	1,517,000	341,383	No	MEU
Protection Forests	55	250,033	173,179	No	GDF
Gene Conservation Forests	283	38,828	38,828	No	GDF
Seed Stands	337	44,664	44,664	No	GDF
TOTAL		5,377,090	1,688,392		

* According to regulations, no timber production is allowed in these areas, however under specific circumstances and by written allowance of the responsible agency, some timber/NTFP production can be undertaken. This can be allowed during renewal of the forest management plans, or through an official application for permission made by the forest chief, to the relevant protected area unit. The forest chief may want to cut forest patches infected with beetles within the protected area or to open a new road which passes through the protected area, etc.

GDF: General Directorate of Forestry; DNP: Department of Nature Protection and National Parks; MEU: Ministry of Environment and Urbanisation

Regarding the spatial scale of the risk assessment, two approaches are at the fore: administrative and ecological. The regional administrative structure of forestry in Turkey comprises three hierarchically clustered bodies: Forest Management Units, forest management directorates and Regional Forest Directorates. In Turkey, Forest Management Units (FMU) are the regional administrative units, where forest management plans are made. Since December 2014 the renewed management plans for these units also incorporate tables on the presence and area sizes of high conservation value forests within the units (59), although these are often not thoroughly prepared (See more under each applicable HCV). Field inventories, which are made to prepare the forest management plans, are focused on tree species used for timber and some plant species used as non-timber forest products. These data are used to determine the place, amount and methods of production. The information for forest areas, which are going to be designated as ecological functioning areas, are obtained from literature-base review (from other institutions, digital elevation models of the area, books, etc.).

Three broad regional forest areas (Mediterranean forests, Black Sea Region forests, and Central and Eastern Anatolian) are used as the main units of analysis, and specific forest types within each of these as the subunits of analysis for the risk assessment. However, the risk conclusions do not differ substantially while the risk conclusions are made at the national level.

There are two types of plantations in Turkey, one is afforestation studies made with a primary purpose of establishing forest areas to combat desertification and these areas are not subject to timber production. The other one is industrial plantations. The industrial plantation areas do not contain HCV areas since such areas are intensive production areas.

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Material Source Identification

Step 3: Material Source Identification					
Area under Assessment		Material Source Characteristics			
Region/Area (potential geographical subdivision where major differences are relevant)	Forest type (type of forest found in the country. E.g. natural forest, Semi-natural forest, plantations etc)	Legal Land Classification (the classification of the land such as permanent forest reserve, farm land, protected area classes etc.)	Ownership (e.g. public, private, corporate, indigenous, individual, farmer, community forests etc.) & scale of operations - (i.e., small, medium & large management operations).	Management regime (indication of different types of forest or tree management rights such as, private, communal, state, provincial government etc.)	Description of the material source type (based on an evaluation of the different attributes evaluated, assign a suitable name for different types of timber/NTFP material sources with similar risks)
Turkey	Natural Forest*	National Parks	State (DNP)	State	Protected natural forest stands* - No timber/NTFP production
		Nature Conservation Areas	State (DNP)	State	
		Nature Monuments	State (DNP)	State	
		Nature Parks	State (DNP)	State	

Step 3: Material Source Identification					
Area under Assessment		Material Source Characteristics			
		Wildlife Conservation Areas	State (DNP)	State	(According to regulations no timber production is allowed in these areas, however under specific circumstances, and by written permission from the responsible agency, some production is allowed.)
		Special Environmental Protection Areas	State (MEU)	State	
		Natural Sites	State (MEU)	State	
	Natural Forest	Protection Forests	State (GDF)	State	Protected natural forest stands - No timber/NTFP production
		Gene Conservation Forests	State (GDF)	State	
		Seed Stands	State (GDF)	State	Natural forest stands - No timber production
	Natural Forests	'Ecological Function' Designated Forests	State (GDF)	State	Natural production forest stands - Limited timber/NTFP production permitted
		'Socio-Cultural Function' Designated Forests	State (GDF)	State	
		'Economic Function' Designated Forests	State (GDF)	State	Natural production forest stands - Production permitted

Step 3: Material Source Identification					
Area under Assessment		Material Source Characteristics			
	Plantation Forests	'Economic Function' Designated Forests	State (GDF)	State	Plantations - Production permitted
		Private Plantations / Farmland	Private	Private	

DNP: Directorate of Nature Protection and National Parks under the Ministry of Forestry and Water Affairs; **GDF:** General Directorate of Forestry under the Ministry of Forestry and Water Affairs; **MEU:** Ministry of Environment and Urbanisation.

Experts consulted

	Name	Organization	Area of expertise (category/sub-category)
1.	Uğur Zeydanlı	Nature Conservation Centre – Turkey	Forest biodiversity – All HCVs
2.	Yıldıray Lise	Nature Conservation Centre – Turkey	Forest biodiversity – HCVs 1-4
3.	Mahir Küçük	UNDP-Turkey	Forest planning and forest biodiversity – All HCVs
4.	Nuri Özbağdatlı	UNDP-Turkey	Innovative program development for forestry – All HCVs
5.	Ali Özel	General Directorate of Forestry	Forest planning – All HCVs
6.	Mehmet Demir	General Directorate of Forestry	Forest planning and forest biodiversity – All HCVs
7.	Mehmet Ehlil	General Directorate of Forestry	Non-timber forest products and forest biodiversity – All HCVs
8.	Kına Arcak	Ministry of Culture and Tourism	Archaeologist – HCV 6
9.	Sedat Akın	Department of Forest Management and Planning under GDF	HCV 6, FM in UNESCO sites
10.	Mehmet Kılıç	Department of Forest Management and Planning under GDF	HCV 6, FM in UNESCO sites
11.	Burhan Aydoğan	Department of Forest Management and Planning under GDF	HCV 6, FM in UNESCO sites
12.	Personal communication with Environmental NGO	Name and organization are known to FSC IC.	HCV6

Risk assessment

Indicator	Sources of Information	HCV occurrence and threat assessment	Functional scale	Risk designation and determination
3.0	1, - 89.	<p>The IUCN Red List details the distribution of threatened species in Turkey (2). The Red List of Plants in Turkey (3) and the Red Book of Butterflies in Turkey (4) list and evaluate the nationally threatened plant and butterfly species. A national Turkish biodiversity database called the Noah's Ark Database contains records on around 500,000 species (5, 6). This database is currently under maintenance, and the information is not accessible. In 2014, the Department of National Parks and Nature Protection (DNP) initiated a country-wide biodiversity inventory study on major species groups at the scale of the provinces. The completion of this study is expected to take several more years, and all of the data gathered will be transferred to the Noah's Ark Database.</p> <p>Non-governmental organisations, using various approaches, have made important studies in determining the priority biodiversity areas, their status and the threats they face in Turkey. The Nature Society of Turkey has determined the country's Key Biodiversity Areas (KBAs). The results are compiled in two large volumes (7). Maps, habitat descriptions, presence of rare, threatened or endemic species, and the specific threats are summarised for 305 KBAs, of which around 35% are forest areas. Three other studies by the Society compiled the existing information on plant, bird and butterfly diversity and distribution to determine the priority areas in which rare, threatened and endemic species of these species groups are found, and areas in which species diversity is high. These studies are published as Important Plant Areas of Turkey (8), Important Bird Areas of Turkey (9), and Conservation Strategy for Butterflies in Turkey (10). The Nature Conservation Centre and the Biodiversity Monitoring Unit of the DNP have conducted 'systematic conservation planning' studies in the Aegean, Mediterranean, Southeast Anatolian, and Black Sea Regions, and along the Anatolian Diagonal Region of Turkey (11, 12, 13). In these studies, priority biodiversity areas of 10 km² were determined in each region so as to cover the present diversity of species and ecosystems, representing areas that are outside the current protected area network and in need of conservation to ensure the continuation of biodiversity in the larger area. All of these studies give substantial information on the distribution of rare, threatened and endemic species, and on areas of high species diversity in Turkey.</p> <p>Another list that can be used to identify forest-dependent rare, threatened endemic and nationally important species is the Biodiversity Integration Scheme. The study was compiled using the IUCN Red List (2), the Red List of Plants in Turkey (3), the Red Book of Butterflies in Turkey (94), books on mammals in Turkey (90, 91) and a guide and checklist of reptiles and amphibians of Turkey (95), and their distribution has been determined at the scale of the Forest Management Directorate through the work of species experts on existing data on the distribution of species obtained from previous studies (1). This was a collaborative study by the General Directorate of Forestry (GDF) and the Nature Conservation Centre, a Turkish NGO. This study was conducted in the 2009-2013 period and involved forest managers from the GDF, and species experts from several Turkish universities and foreign experts. Target forest species were categorised by the species experts using a scoring scheme, which prioritised the IUCN</p>	Country	<p>Low risk. Threshold (1) and (2) is met. Data available are sufficient for determining HCV presence within the area under assessment; AND Data available are sufficient for assessing threats to HCVs caused by forest management activities.</p>

	<p>threat category, dependency on forest ecosystems, ease of inventorying, and ability to represent species diversity (i.e. keystone and umbrella species were prioritised). The eventual list of target forest species for conservation is given in Appendix 1. The distribution of these target species was also determined and mapped. Lastly, the species experts produced a list of rare, threatened, endemic or nationally important forest species for each Forest Management Directive (FMD) using the most recent known distributions of those species (given in Appendix 2). A total of 114 target forest species were selected. More species are added to this list during integration studies being done in specific Forest Management Units.</p> <p>Besides these target species, special forest areas representing ecological processes/characteristics were also included. These are: old-growth forests, stands with high tree diversity, stands with unusual tree composition, large forest blocks and forest corridors, marginal tree species populations, stands with special micro-climates, relict forest ecosystems, aquatic habitats, and peat bogs within forests. The integration approach used the FMDs as the unit of analysis and utilised five main steps for each FMD, whose forest management plans are being renewed: i) finalising the target species and ecological processes to be used in integration, ii) determining the distribution of biodiversity targets by modelling of presence records, iii) creating a conservation zone map of the planning units using the distribution models and conservation goals for each biodiversity target, iv) evaluation and finalisation of the conservation zones with the foresters in the FMD, and v) preparing silvicultural prescriptions for conservation zones (on the forest stand scale).</p> <p>The studies described above provide valuable information regarding HCV 1-3 and are also used for assessing the threats in terms of management practices and location in the field.</p> <p>For HCV 1, the species lists for major terrestrial groups such as birds, mammals, reptiles, amphibians, butterflies and some other invertebrate groups and plants are well studied, but there are still large gaps in the knowledge of invertebrates and other groups such as mosses, lichens and fungi in Turkey. Although the IUCN status of a number of species is data deficient (DD), many rare, endangered and endemic species are known and their general distributions documented. The Biodiversity Integration Scheme explained above deals mainly with determining which rare, threatened and endemic forest and forest-related species are to be focused on to determine their distribution in Forest Management Units, to designate these areas as nature conservation forests, and to establish a management scheme which does not harm their populations. There are studies, too, which bring together information on species distributions to determine the diversity of species and the concentration of endemic species in Turkey (7, 8, 9, 10). However, further studies are needed, using known distributions and information on the RTE species found in the literature, to determine which RTE species are present in a specific Forest Management Unit, and further field studies are also needed to determine the localities of their populations within the relevant unit more precisely, and to prepare new forest plans accordingly.</p> <p>There are known forest areas with enough data to designate them as qualifying as HCV 2 and HCV 3 areas. However, there is not enough data to delineate their exact boundaries, or their state, composition or characteristics. Additionally, there could be forest areas that qualify as HCV2 or HCV 3 which are yet unknown, and the identification of which will require local field studies.</p>		
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	<p>KBA and the Biodiversity Integration Scheme has been used for this assessment to give an overview of the main threats or potential benefits to the HCV1-3 areas, and scientific papers, popular articles and stakeholder interviews have been used to flag out concerns for damage of HCV values.</p> <p>For HCV 4 areas, the General Directorate of Forestry classifies the land and land use of the planned forest areas to determine water catchments and areas vulnerable to erosion. The applicable forest categories that provide ecosystem services are identified in GDF Regulatory Document No: 299. The areas are well mapped in forest management plans. In areas with high erosion risk, afforestation works take place, and these safeguards measures are well documented by the Ministry of Forestry and Water Affairs (i.e. 41, 87).</p> <p>For HCV 5 areas, certain information on the use by local forest villagers of forest resources can be found, such as the data on the amount of fuel-wood and industrial wood provided, areas where grazing of livestock is allowed etc. This information can be obtained from the records of each Forest Management Unit. However, apart from a small number of local studies, which generally produce questionnaire-based data, and country-wide data on national assessments, no data on the actual amount of necessities and uses of forest resources by local forest villagers and trends on these matters, was found. This type of data can be most easily obtained through local fieldwork in villages within the boundaries of specific Forest Management Units. Threats to the HCV5 were identified through stakeholder consultation as well as NGO studies.</p> <p>Archaeological, cultural and historical sites of national and international concern, which qualify as HCV 6 areas, are well documented, mapped and catalogued by the Ministry of Culture and Tourism, or in forest management plans. Interview with Ministry of Culture and Tourism and foresters were conducted during CNRA development, and experience were drawn from dialogue with villagers (previous experience).</p> <p>Although the new forest management plans allocate forest areas for nature conservation, the selection of these areas and the limitations on forest operations are not determined specifically according to the HCV of the given forest area –safeguards in legislation are usually generic and in addition, on-the-ground application of these safeguards remains incomplete.</p> <p>To substantiate and support the conclusions drawn from literature, findings have been based also on general field observation, corroborated by expert review of this HCV CNRA. Please see the full list of sources in the “Information Sources” table.</p> <p>Risk specification Low risk. Threshold (1) and (2) is met. Data available are sufficient for determining HCV presence within the area under assessment; AND Data available are sufficient for assessing threats to HCVs caused by forest management activities.</p>		
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<p>3.1 HCV 1</p>	<p>1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 59, 90, 91, 92, 93, 94, 95, 100, 101, 102, 104, 105, 106, 107,108, 109.</p>	<p>Occurrence</p> <p>a) Species that are listed as rare or threatened in the IUCN or National lists. b) Known centres of endemism for plants and amphibians in certain managed forest areas. c) Forest areas that host migratory bird species during the migration season d) Forest areas with high species diversity. e) Forest areas that contain refugia or relict forest areas for plant communities and associated species, belonging to a different biogeographical region.</p> <p>Rare, threatened, endangered and endemic species or keystone or umbrella species are found in almost all of Turkey's forested areas, and are mostly concentrated in the Mediterranean and Black Sea Regions.</p> <p>RTE species can be identified in the international and national red lists, which provide information on the distribution of threatened species in Turkey (2). The Red List of Plants in Turkey (3) and the Red Book of Butterflies in Turkey (4) list and evaluate the nationally threatened plant and butterfly species respectively. A national Turkish biodiversity database called the Noah's Ark Database contains records of around 500,000 species (5, 6).</p> <p>The Biodiversity Integration Scheme. provides an eventual list of target forest species in Appendix 1. The distribution of these target species was also determined and mapped, as well as a list of rare, threatened, endemic or nationally important forest species for each FMD using the most recent known distributions of those species (given in Appendix 2). A total of 114 target forest species were selected. More species are added to this list during integration studies being done in specific Forest Management Units.</p> <p>As a result of this approach, its adoption, and the increased number of pilot studies held in different forest areas in Turkey, it is possible to conclude that there is HCV 1 in at least some part of every Forest Management Directorate in Turkey.</p> <p>In order to determine the exact locations and boundaries of the RTE sites within the FMDs and to integrate these areas into forest management plans, field studies should be conducted, however, this has not been done for the majority of the forest management plans. Many RTE sites at the regional scale are outlined in major studies made on the diversity of species in Turkey, namely the Key Biodiversity Areas and Systematic Conservation Planning studies (7, 8, 9, 10, 11, 12, 13).</p> <p>a) All of the areas under assessment contain species that are listed as rare, threatened or endangered. The work of the Nature Conservation Centre in collaboration with the General Directorate of Forestry determined 114 forest-dependent rare, threatened, endemic or nationally important forest species found within each Forest Management Directorate (FMD) in Turkey (1). These 114 priority species, grouped into woody and non-woody plants, butterflies, reptiles, amphibians, birds, and mammals, are determined by experts on each group. The list of target forest species, determined by the collaborative study of the GDF and the NCS, as explained above, is given in Appendix 1, and their distribution within FMDs is given in Appendix 2. According to this list, each</p>	<p>Natural forest</p> <p>Plantation forest</p>	<p>Specified risk Natural forests Threshold (8) is met: HCV 1 is identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities.</p> <p>Low risk Plantation Threshold (5) is met: There is no HCV 1 identified in the area under assessment and its occurrence is unlikely.</p>
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		<p>forest management units with biodiversity integrated forest management plans, Nature Conservation Centre, 2015)</p> <ul style="list-style-type: none"> • Forest openings are sometimes afforested by forest managers. This practice creates a homogeneously closed forest and disturbs the habitats of species dependent on forest openings. There are silvicultural regulations, which dictate that forest openings less than 3 hectares be left as openings and not forested. However, forest managers do not always apply these rules <p>As a result of the opening of new forest roads, habitat fragmentation and habitat disturbance occur in forests. Many important species diversity areas are under protection, but the majority of the biodiversity, including rare, threatened, endangered and endemic species, exists outside protected areas on land that is designated managed forest. Through amendments to conventions signed by Turkey, such as the Bern Convention on the Conservation of European Wildlife and Natural Habitats and the Convention on Biological Diversity, legislation in Turkey requires that RTE species be protected. The Turkish definition of RTE corresponds to the IUCN Redlist, and also takes other international conventions into account. According to the new forest management planning regulation, No. 299 (59), in effect since 2014, the Regulatory Document No: 299 (59) states that inventorying of biodiversity – including RTE species – and integration of the outcomes into forest management plans is required for new forest plans. Forest management plans (FMPs) act as regulatory documents for the given forest unit for the following 10-20 years. Within each Forest Management Unit, and by integrating relevant information into the new forest management plan, areas with RTE species will be mapped and designated as having a nature conservation function, limiting or totally restricting forestry operations in these areas.</p> <p>The regulatory documents of GDF on forest planning and management (i.e. sources 59 and 102) provide safeguards for the conservation of HCV 1 areas. The technical regulatory document (59), which explains the general methodology of making forest management plans has a specific section on determination of ecologically functioning areas and biodiversity inventories, giving a general guideline and definitions. These sections refer to the ‘Biodiversity Integration Scheme’. The regulatory document on silvicultural management (102) also gives general guidelines, which serve in conservation of species in the production forests, such as leaving the wild fruit trees untouched or using the same skidways to carry logs out of the forest to minimize the effect on soil or leaving 1-3 snags and logs per ha. untouched in the forest to benefit dependent species etc. Forest areas where values for soil, water and conservation are identified will be designated as ecological function. Connectedness of forest and natural composition of forests should be protected; rare and threatened species should be conserved; no forestry operations be done in belts of highest forest and all snags, logs and deadwood should be left in the forest.</p> <p>However, as the legislation was recently introduced the location of HCV1 values are unknown for the majority of forest management units which is posing a risk for damaging these values. Furthermore, there is a risk that the responsible foresters lack the knowledge on how to identify rare, threatened and endangered species within the forest.</p>		
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		<p>(104). According to these plans, the protected area is divided into zones. No activity is allowed in the “absolute protection zone” (105). However, timber/NTFP production can occur in other zones. There is also an official agreement between the GDF and DNP on the granting of permission to make forest inventories and plans for National Parks, which leads to some timber production occurring in National Parks, too (106). Natural forests found in the Special Environmental Protection Areas and Natural Sites are protected areas governed by the Ministry of Environment and Urbanisation. Some of the Special Environmental Protection Areas cover large territories, which include forests, and foresters perform afforestation, timber and NTFP production in these territories, too. Natural Sites, on the other hand, are being re-evaluated at the time of writing, and many of them may lose their protection status in the near future. Natural Sites have been founded by Local Protection Boards. Government officials think that many of these areas may have been evaluated wrongly and that they do not really contain areas of high conservation value. For this reason, since 2012 these sites have been under re-assessment (107). Once these assessments are complete, the protection status of many Natural Sites may be lowered or annulled, and this would mainly lead to the conversion of the use of these areas from natural habitats to residential or other kinds of construction, which can pose a threat to the HCV1 values in the areas. However, this threat should be met with proper identification of HCV values in the Forest Management plan.</p> <p>As of December 2016, there are Forest Management Directorates (FMDs), where FSC certification is already in place or the ones with new forest management plans in which ‘integration of biodiversity conservation’ is completed. Figure 3 shows those FMDs with an FSC certification (blue) and those with biodiversity integration (green). The red FMDs are those with a recently renewed forest management plan in which no FSC scheme is present or in which biodiversity integration is complete. The next renewal of plans in the red FMDs will have begun by 2022. For the rest of the FMDs (non-coloured), there is a possibility that ‘biodiversity integration’ studies shall be undertaken during the renewal of forest management plans starting from 2017, though it is not clear yet in which of these FMDs a biodiversity integration study will be done.</p>		
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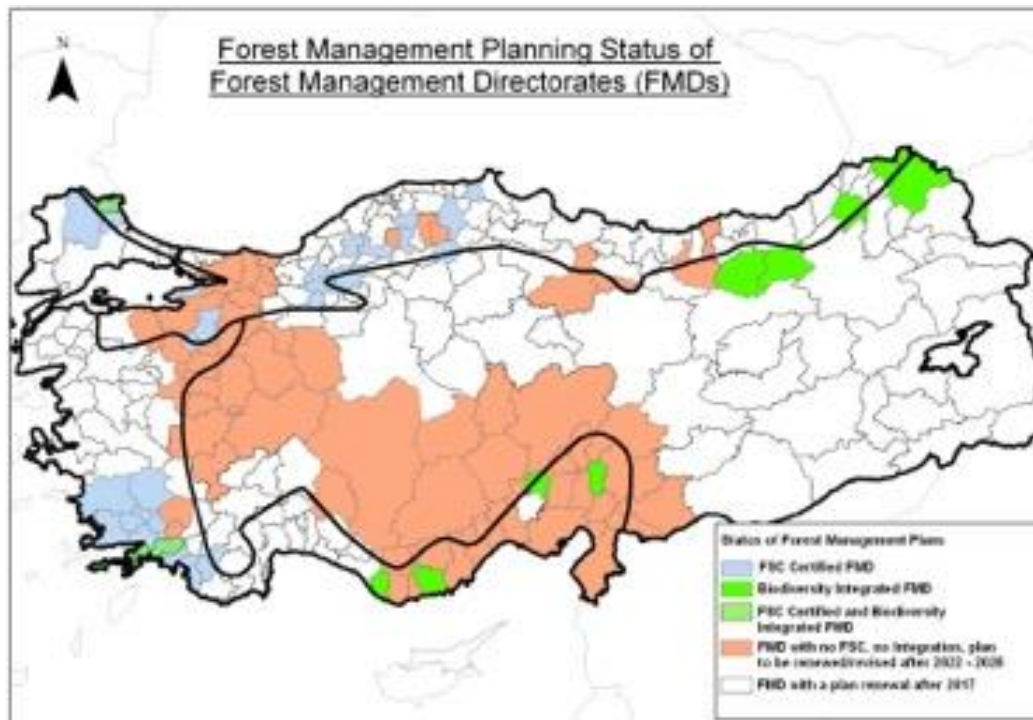


Figure 3. The status of forest management plans of Forest Management Directorates (black line shows boundary between geographic regions).

Risk is considered specified based on lack of identification of HCV 1, and/or lack of protection due to a protection regime only recently having been established in forest management plans. Data has not been able to show sufficient implementation.

Risk Specification

Natural forest:

Specified riskThreshold (8) is met: HCV 1 is identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities.

Plantation:

Low risk. Threshold (5) is met: There is no HCV 1 identified in the area under assessment and its occurrence is unlikely.

3.2 HCV 2	1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 27, 28, 59, 98, 102, 114.	<p>Occurrence</p> <p>a) No part of Turkey is covered by Intact Forest Landscapes (IFL) (98)</p> <p>b) There are large forest areas that have experienced less human disturbance and forest management</p> <p>c) There are regionally significant forest areas that are representative of the original natural forest cover found in the given region. There are also forest areas that comprise landscape-scale biodiversity due to the presence of different types of ecosystems intertwined within a given large forest area.</p> <p>d) All of the buffer zones of National Parks and other protected areas are recognised as transition zones between protected forests and management forests.</p> <p>There are no specific formal studies on the presence and distribution of large, landscape-level forest ecosystems, which can be considered HCV 2 areas. However, there are large and intact forest areas in the Black Sea and Mediterranean Regions. The forests of the Eastern Black Sea Region, especially, contain large and connected forest areas with few settlements in or around them. There are fewer but similar large and intact forest areas in the Western Black Sea Region, too. The Mediterranean Region has a higher human population density, and has been utilised more intensively by local migratory livestock. Still, there are large and intact forest areas, such as those in the Amanos Mountains in the Eastern Mediterranean or Dilek Peninsula, and in the Kaz Mountains in the Northern Aegean Region. In general, these forest areas have been subject to forest management, but they still substantially retain their original composition and species diversity. For instance, the İbradı-Akseki-Gündoğmuş Forests, the Tahtalı Mountains and Baba Mountain are the most species diverse forest areas in the Mediterranean Region of Turkey. Mediterranean maquis vegetation extends throughout the country's Mediterranean and Aegean coasts and comprises a high diversity of species. Mediterranean maquis vegetation extends throughout the Mediterranean and Aegean coastal parts of Turkey, and the large, connected parts of these maquis forests can be considered HCV 2 areas. For instance, the Key Biodiversity Areas which extend, west to east, unbroken along the south-western Mediterranean coast, namely Baba Mountain (54,940 ha.), Patara (11,872 ha.), the Kaş-Kalkan Coasts (9,512 ha.), Kekova (27,867 ha.), and Kale (4,725 ha.), which cover a total of 108,916 hectares, the majority of which is maquis-dominated forest (7).</p> <p>All of the buffer zones of the National Parks and other protected areas, which are situated mainly within forest ecosystems, should be recognised as HCV 2 areas. Within these areas moderate forest management prioritizing forest conservation can be done. For instance, Küre Mountains National Park, which is found in the Western Black Sea Region, has a buffer zone recognised as a transition zone between protected forests and management forests; some of these areas are documented in the Key Biodiversity Areas of Turkey and also in the Long Term Development Plans of Nature Protection Areas. According to the HCV 2 definition, all other buffering forest areas around protected areas can be considered HCV 2 areas. Certain large and forest-dominated National Parks have large, continuous forest cover in their core (strictly protected) zones in which no forest management is conducted and there is minimal, if any, human activity. Specifically, Hatila Valley National Park (16), Küre Mountain National Park (17, 18, 19) Kaçkar Mountain National Park (20), all located in the Eastern Black Sea Region, are some examples of National Parks of this kind. In these studies, the authors provide maps and other information on the presently intact and pristine forest areas found within, and the buffer zones of, protected areas. Similar studies</p>	Natural forest Plantation	<p>Specified risk. Natural forest Threshold (12) is met: HCV 2 is identified and/or its occurrence is likely in the area under assessment, and it is threatened by management activities.</p> <p>Low risk Plantation Threshold (9) is met. There is no HCV2 identified and its occurrence is unlikely in the area under assessment.</p>
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	<p>documenting the character of forests exist for most protected areas from which it can be deduced whether these areas contain HCV 2 forest areas.</p> <p>Several connectivity areas were determined in the Turkey-wide study on Key Biodiversity Areas (1-3) and in regional studies of Systematic Conservation Planning (5-10). In certain Key Biodiversity Areas, the extent of distribution of species diversity encompasses large, connected and predominantly natural forest areas, which can be considered HCV 2 areas. To give some examples, the Istranca Mountains in the Western Black Sea Region is a 195,986 hectares area of which 156,752 hectares are continuous forest with a majority of the naturally occurring species present (22). The Northern Black Sea Mountains represent another Key Biodiversity Area, one which contains several protected areas and other large and continuous managed forest areas. These managed forest areas can also be considered HCV 2 areas since they connect these protected areas and retain their natural species diversity, including large mammals such as the brown bear (<i>Ursus arctos</i>), wild goat (<i>Capra aegagrus</i>), chamois (<i>Rupicapra rupicapra</i>), and the wolf (<i>Canis lupus</i>), all of which require large, connected habitats. The habitats, the presence of these species, and the continuous nature of these forests have all been documented in various studies (11, 23, 24).</p> <p>There are also large and continuous forest areas in the Mediterranean Region, which have been selected as Key Biodiversity Areas (KBA) due to their species diversity. These are large contingent areas and are not legally protected. One such area is the Akseki-İbradı Forests. This KBA covers 134,921 hectares of which 78,325 hectares are forest area retaining its continuous structure and in which top predators and large mammals requiring a large range still occur (25). Another example of a Mediterranean HCV 2 area selected as a KBA is the Amanos Mountains. Here there are two wildlife conservation areas. The KBA covers 378,585 hectares, 308,287 hectares of which are forested. Various publications document the species diversity in these mountains, and describe the forest characteristics of the area (26, 27, 28). A list of Key Biodiversity Areas is given in Appendix 4, which shows the significant HCV 2 areas found within. In Appendix 5, the priority areas, designated in six regional Systematic Conservation Plans, are given as a map.</p> <p>HCV 2 areas occur in all regions and types of forests in Turkey. There are large forest blocks, some with a history of minimal forest management; forest areas with high degrees of species diversity; and forest areas formed or dominated by endemic forest trees. There are continuous forests in the North-eastern Black Sea Region that extend beyond the border of Turkey and into Georgia, the area known as the Lesser Caucasus.</p> <p>HCV2 cannot be found in plantations, because the definition of HCV2 does not correspond to plantations.</p> <p>Threats and Safeguards Identification and Evaluation</p> <p>Ensuring large connected areas are not a priority under Turkish legislation and HCV2 areas are not mapped. At the time of writing, new forest road plans are being developed for managed forests. Some of these roads may create or increase fragmentation of forests.</p>		
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		<p>In the Mediterranean Region, maquis scrubland forms large blocks of forest. However, maquis is excluded from the definition of 'forest' by current forest law (114). Due to this, many maquis areas have not been included in the forest cadastre, rendering them vulnerable to destruction. The maquis that are within the forest cadastre are usually designated as degenerate forests in forest management plans and are thus subject to afforestation with Turkish pine or to conversion into orchards through private afforestation. In the forest management directorates in which biodiversity integration studies are undertaken, representative and significant maquis areas are reserved as conservation forests in which no afforestation, timber or NTFP production is allowed (59).</p> <p>There are general statements in regulatory documents of GDF on forest planning and management (59, 102). These statements include, for instance establishing ecological buffer zones and corridors around and between nature conservation areas. For forest areas designated as ecological function, where nature, soil and water conservation is the first aim, recommendations are given to ensure the connectedness of forest to be protected; natural composition of forests should be protected.</p> <p>Local studies are required of these potential forest areas to assess their current condition and accurately determine the boundaries of these HCV 2 areas.</p> <p>In the biodiversity integration scheme fragmentation analyses are done to determine the extent of continuous forests, the locations where fragmentation occurs – sensitive forest areas, which if lost, would lead to fragmentation and other non-forested areas, which if reforested, would decrease fragmentation. Therefore, the presence of HCV 2 areas are studied under the biodiversity integration scheme (21). Forest management plans are made for each Forest Management Unit, the biodiversity integration studies are done at the level of the Forest Management Directorate, each of which comprises 5-10 Forest Management Units. Therefore, larger and connected areas can be designated, extending across neighbouring Forest Management Units. In addition to seeking large blocks of forests and assessing fragmentation, the resulting HCV 1, 2 and 3 areas as an output of biodiversity integration study, are mapped by including the connecting corridor areas between them, to form larger connected forest areas with nature conservation function. However, pilot testing of the Biodiversity Integration Scheme in 2014 and 2015 shows that even for areas in which HCV 2 areas have been identified, some lack of implementation of protection persists (Nature Conservation Center unpublished report). This can be explained by the requirement being newly introduced and the implementation being a work in progress. The implementation of biodiversity integrated plans is still not complete.</p> <p>The threat on HCV2 areas are mainly road building. Lack of identification of HCV2 areas, as well as safeguards to protect large connected areas result in a risk to HCV2.</p> <p>Risk Specification Natural forest: Specified risk. Threshold (12) is met: HCV 2 is identified and/or its occurrence is likely in the area under assessment, and it is threatened by management activities.</p>		
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		<p>Plantation: Low risk. Threshold (9) is met: There is no HCV2 identified and its occurrence is unlikely in the area under assessment.</p>		
3.3 HCV 3	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 21, 26, 27, 28, 31, 32, 33, 34, 35, 36, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 80, 102.	<p>Occurrence The forest areas in Turkey which can be considered HCV 3 are:</p> <ol style="list-style-type: none"> 1. Floodplain forests (rare ecosystem) 2. Relict forests 3. Forests dominated by endemic tree species or subspecies 4. Type 2 old-growth forests (stands that have been logged, but which retain significant late-successional/old-growth structure and functions). <p>Floodplain forests in Turkey are found near coastal areas, in the vicinity of wetlands. One of the most well-known and studied floodplain forests in the Black Sea Region is found in the İğneada forests and their environs, parts of which are protected land. Several scientific studies have documented the characteristics of these floodplains, the natural boundaries of the area, the floristic composition and the properties of the area that are a priority for conservation (31, 32, 33, 34, 35, 36). There are other floodplain forests in the Black Sea and Mediterranean Regions, some of which are totally or partly protected areas. Most of these floodplain forests are documented in the scientific literature (i.e. 14) or in the work of NGOs, as in Key Biodiversity Areas, Important Bird Areas, Important Plant Areas and Systematic Conservation Planning Studies (7, 8, 9, 10, 11, 12, 13) and from field studies (7, 9) conducted by experts hired by the Nature Society.</p> <p>There are relict/enclave forest areas (enclave forest is a type of 'forest island', a forest surrounded in a larger scale by a different forest or other ecosystem. Relict forests, are remnants of forests existed long before. If only a patch of forest is left it can be considered as enclaves; or remnants of forests, which extended their ranges during climatic changes in previous geological periods.) in Turkey, documented by scientific studies by universities and research institutions, and in the work of nature conservation NGOs. For instance, relict forests of Euro-Siberian make-up are found in the Amanos Mountains in the Eastern Mediterranean Region (26, 27, 28). Relict forests of Mediterranean origin are also found in the Euro-Siberian biogeographic region of Turkey, in the Kelkit, Çoruh, Hatila and Barhal Valleys of the Black Sea Region (7, 16, 41). Bush and tree species with origin in the Mediterranean region, and forest stands made up of these species, are found in abundance in various parts of these valleys. In the Central Anatolian Region, relict black pine forests are found, whose best known examples are Beynam forest, which is protected (42, 43), and Yozgat Pinary forest, which is a National Park (44, 45). These are smaller relict forest areas of black pine (<i>Pinus nigra</i>) of 700-1200 hectares in size.</p> <p>There are forest areas in Turkey composed predominantly of endemic tree species or which contain a large proportion of woodland made up of endemic trees. Some of these forest areas have been designated as protected areas, and no timber production takes place within them. However, there also many such forest areas that are within the managed forest regime and thus in which timber or fire-wood production takes place. A number of these</p>	Natural forest Plantation	<p>Specified risk. Natural forest Threshold (17) HCV 3 is identified and/or its occurrence is likely in the area under assessment and it is threatened by forest management activities.</p> <p>Low risk Plantation Threshold (13) is met: There is no HCV 3 identified and its occurrence is unlikely in the area under assessment.</p>

		<p>forests of endemic tree species/subspecies include oriental sweetgum (<i>Liquidambar orientalis</i>) forests, found especially around Köyceğiz Lake in the Western Mediterranean Region. Ürker (2014) provides a comprehensive account of the status, distribution and significance of these sweetgum forests (46), and the Nature Conservation Centre has conducted a landscape analysis to determine the fragmentation of these sweetgum forests in the Köyceğiz region to propose reforestation corridors in order to increase their connectivity (47). Another endemic tree species is the kasnak oak (<i>Quercus vulcanica</i>), which forms small forest areas in Central Anatolia. The distribution of kasnak oak is mostly documented in various studies by universities and forest research institutes (48, 49, 50). However, the exact boundaries of the forest areas composed of this species need to be determined. An endemic subspecies of Caucasian fir (<i>Abies nordmanniana equi-trojani</i>), makes up intact forests in the Kaz Mountains (51, 52), including an estimation of the genetic diversity of different sub-populations (53).</p> <p>There are known old-growth forest areas in Turkey, most of which can be considered type 2 – stands that have been logged, but which retain significant late-successional/old-growth structure and functions. Some of these old growth areas have been determined, and their locations and boundaries delineated, for example in the Northeast Black Sea Region, widely studied by Dr Oğuz Kurdoğlu of Trabzon Technical University (54, 55, 56, 57). In these publications, Kurdoğlu et al. document old growth forests found in the North-eastern Black Sea Region. They give information on the characteristics of these forests, which make them type 2 old-growth forests. There are also type 2 old-growth forest areas in other parts of Turkey, and these have been found using specific field studies, such as those done for the Biodiversity Integration Scheme studies in the Mediterranean Region (unpublished reports). Site-specific studies are needed to determine the locations and boundaries of such type 2 old-growth forests, which fall within areas governed by the managed forest regime. Such forests have survived mainly due to the lack of roads to certain remote and rugged forest areas. There are also old-growth forest areas that are already within protected areas, such as the Örumcek Forests in the Black Sea Region, or the old cedars in the Çiğlıkara Forest and the old black forests around Sandras Mountain in the Mediterranean Region, all of which are documented in a dedicated book on the Nature Conservation Areas of Turkey (58).</p> <p>A list of significant forest areas with HCV 3, found within Key Biodiversity Areas, by Eken et al. (2006), is given in Appendix 4. The priority conservation areas determined by Systematic Conservation Planning studies, some of which contain HCV 3 areas, are shown in the maps in Appendix 5. In addition to the summary outlined in Appendix 5, these published studies (1-10) can also be used to assess the presence of HCV 3 areas and present threats. However, local studies are required in these potential and other forest areas to assess the current conditions and to accurately determine the boundaries of these HCV 3 areas.</p> <p>Based on the knowledge and experience of the experts who developed this assessment, HCV3 is considered not applicable for plantations.</p> <p>Threats and Safeguards Identification and Evaluation</p> <p>There is a general threat of HCV 3 values being damaged through harvesting, as HCV3 are often not identified in forest management plans and therefore at risk of being logged.</p>		
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		<p>issue at national scale, due to the method of drafting the current management plans. However, there are examples of protected forests designated by forest planners, where endemic tree species form forest patches. If there is information in the literature on the presence of i.e. an endemic tree species and if the forest planner is aware of it, then such an area can be protected through forest management plan. But if no such information is present, or the forest planner is unaware of it, then such an area may go unnoticed. Therefore, specific field inventories are required to determine such areas (The Biodiversity Integration Scheme is designed to fill this gap).</p> <p>Remaining type 2 old-growth forests may be subject to timber production. In silvicultural regulation documents, forest areas which have not been regenerated within the given rotation period – specific to the forest tree species – are deemed to be prone to ‘collapse’ and should immediately be regenerated. Old growth forest areas are usually considered to be in need of such regeneration and are thus included in regeneration plans. In every region, forest managers can allow the use of snags, logs and other dead wood as firewood for the purpose of local subsistence. This practice harms the essential characteristics of old growth forests. There are safeguards present in the regulatory documents on forest planning on retention of small patches of forest and old trees (59 - Methods and Principles for Making Ecosystem Based Functional Forest Management Plans: Regulatory Document No: 299. General Directorate of Forestry), where forest planners should designate old forest area as an Old Growth Forest and allocate that area as nature conservation forest.</p> <p>Progress has been made toward achieving the Aichi biodiversity targets through the implementation of new projects. However, as stated in the Fifth National Report on CBD (2014), these projects have not yet been completed, and a revision of the National Biodiversity Strategy Action Plan is needed to assess the achievement of the Aichi biodiversity targets. As stated in the Fifth National Report on CBD (80), the total area of protected land (terrestrial) as of 2013 is 7,883,551 hectares (including wetlands), or 10.1% of the total land area of Turkey.</p> <p>There are forest areas with HCV 3 in every region of Turkey. Although there is currently no systematic mapping of HCV 3, There are safeguards in the Methods and Principles for Making Ecosystem Based Functional Forest Management Plans: Regulatory Document No: 299. (59) to protect HCV3 values, but forest management planning scheme often does not have the necessary tools to identify these areas and preform relevant conservation oriented management. The safeguards are weakly formulated and the designation of these areas will be determined by the forest manager, who might not have adequate knowledge and training to identify these areas. Furthermore, these areas will only be identified under the drafting of a new management plan.</p> <p>The methodology of the Biodiversity Integration Scheme, used to identify environmental High Conservation Values and incorporate these into forest management plans, have been used in 12 forest management directorates in Turkey since 2011 (The work was done with the General Directorate of Forestry on Integration of Biodiversity into Forestry in 2009 and first integration study was done in 2011). Under this programme HCV3 values were identified. This scheme provides a good tool for identifying relevant HCV3. In 2014 and 2015 Nature Conservation Centre made an assessment study in a sample of the FMDs, in order to evaluate the implementation of the outputs from biodiversity integration study (unpublished report). The assessment showed that there are still issues with the actual implementation of the requirement to protect HCV3 values. This is due to the requirement of protecting HCV values have only recently been applied. The issue with implementation can be considered to be a general risk at</p>		
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national level and more evidence for actual implementation in the field is required to state that HCV3 values are sufficiently protected.

As of December 2016, there are Forest Management Directorates (FMDs) in which FSC certification is already in place, and others with new forest management plans in which 'integration of biodiversity conservation' has been completed. Figure 3, below, shows those FMDs with an FSC certification (blue) and biodiversity integration (green). The red FMDs are those with a recently renewed forest management plan in which no FSC scheme is present or in which biodiversity integration is complete. The next renewal of plans in these red FMDs will have been begun by 2022. For the rest of the FMDs (non-coloured), there is an opportunity and a possibility for 'biodiversity integration' studies to be done during the renewal of forest management plans starting from 2017, though it is not clear yet in which of these FMDs a biodiversity integration study will be undertaken.

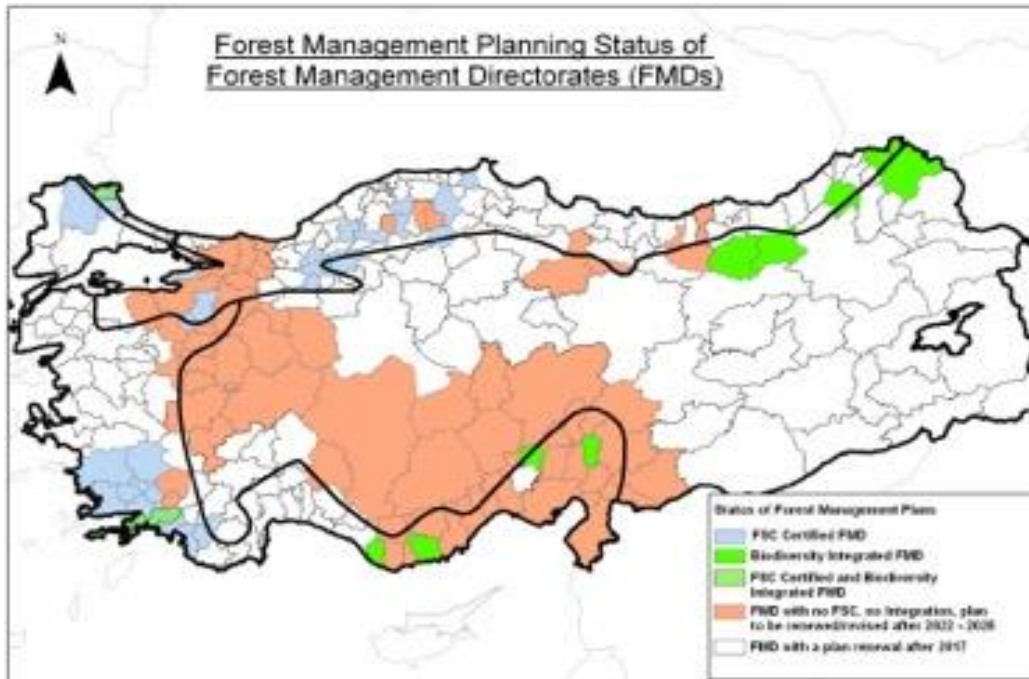


Figure 3. The status of forest management plans of Forest Management Directorates (black line shows boundary between geographic regions).

		<p>Thus, the risk is specified due to lack of identification of HCV 3 areas and/or a risk that identified HCV 3 areas are not sufficiently protected.</p> <p>Risk Specification Natural forest: Specified risk. Threshold (17) is met: HCV 3 is identified and/or its occurrence is likely in the area under assessment and it is threatened by forest management activities.</p> <p>Plantation: Low risk. Threshold (13) is met: There is no HCV 3 identified and its occurrence is unlikely in the area under assessment.</p>		
3.4 HCV 4	41, 59, 87, 102, 110, 111, 112, 113.	<p>Occurrence</p> <p>a) Forest critical to mitigating flood risk b) Forest critical to mitigating erosion risk c) Forest important to controlling fire risk d) Water protection forests.</p> <p>The following are standard methods applied by forest planners as described in the regulatory document on forest management planning (59).</p> <p>As a forest planning and management practice, foresters designate high slope and/or shallow soiled areas as 'ecologically functioning' areas (having an Erosion Prevention Function), and take them into protection without any production of timber (see Appendix 3). Whenever they are in the vicinity of a water reservoir, forest areas are designated as 'ecologically functioning' forests (having a Hydrologic Function), and relevant management prescriptions are put in place to preserve and/or improve this function.</p> <p>Forests critical for erosion control and prevention are determined by forest planners. In order to determine high-slope areas, foresters use digitised topographic maps (of military origin) at 1/25,000 scale, or SRTM maps derived from satellite images, which provide a digital elevation model of the whole country at resolutions ranging from 50-100 metres. Using these base maps, foresters determine the slope angles for each forest stand and decide whether they are to be designated as having erosion control or flood regulation functions according to the criteria given in Appendix 3. These criteria are found in the relevant regulatory document (59). In short, foresters classify forests, according to slope, into several classes: in areas where slope is >80%, no timber production or any other forestry operation is allowed; areas with slope <80% but >60% are designated as forests with an erosion control function, and all planning and forestry operations are designed and managed accordingly). Forest areas where absolute soil depth is less than 25 cm, or where physiological soil depth is less than 50 cm, are also designated as no timber production areas. Forest areas with soil composed more than 50% of stone are also designated as forests with an erosion control function, and no timber production is allowed. All such areas are classified for all of the managed</p>	<p>Production forest (Natural forest and plantation forest)</p> <p>Protected forest</p>	<p>Specified risk. Production forest (Natural forest and plantation forest) Threshold (22) is met: HCV 4 areas are identified in and/or its occurrence is likely in the area under assessment, and it is threatened by management activities.</p> <p>Low risk. Protected forest Threshold (20) is met. There is low/negligible</p>

	<p>forest areas and put into forest management plans covering all of Turkey's 1,340+ Forest Management Units. There is no exception to this. Classifying the forest areas according to slope and mapping those forest areas having slopes within specific limits is a very straightforward task done with the use of GIS programs. Stony areas are those areas in which the ground is dominated by rocks. Such areas are designated during field surveys in preparation for forest management planning. (Foresters sample locations at points 300 or 600 metres apart for all of the forested areas in the planning unit, and measure the canopy cover, forest composition and age classes at these locations, as well as the ground cover, soil depth and other parameters).</p> <p>Forests critical for water regulation and flood control are also determined by forest planners. Such areas are designated as having a hydrological function, and timber production is either not allowed or is regulated/limited in such a way as to fulfil the hydrological functioning of the area. These areas are defined as:</p> <ul style="list-style-type: none"> • Forest areas within or around areas that serve as reservoirs for drinking water • Forest areas in or around dams, ponds or water reservoirs • Forest areas surrounding rivers which feed any type of water reservoir • Other areas designated as water reservoirs by local authorities or by the General Directorate of State Water Works. <p>Forests critical for climate regulation are also determined by forest planners. These areas are those forest areas which:</p> <ul style="list-style-type: none"> • Neighbour human settlements • Neighbour farmlands and are perpendicular to the prevailing wind direction (the necessary information is obtained from local meteorological data of the area). <p>Forests are classified according to their potential for forest fire risk. The precautionary forest management schemes are explained, such as establishing mixed forest stands, performing relevant tending operations, establishing cleared fire corridors and planting corridors of fire resistant tree species etc.).</p> <p>All forest planners utilise these data during their planning process and designate relevant forest areas, which serve as HCV 4 forests. Additionally, the GDF has conducted national and international projects on the basin and sub-basin scales specifically on erosion control in the Central and Eastern Anatolian Regions (i.e. 41, 87).</p> <p>Threats and Safeguards Identification and Evaluation</p> <p>Forest management plans determine HCV4 forest areas, which serve a hydrological function and forests important for controlling fire and propose relevant management operations to support this function. In 2014, similar to the study on integration of biodiversity into forest management, a collaborative project between the General Directorate of Forestry and the United Nations Development Program was completed. This project determined the methods for the allocation and management of forest areas designated as hydrologically functioning forests. In all the forest areas with high fire risk, seasonal fire prevention and intervention teams and posts are activated with additional staff, throughout the high risk season. For 2017, the GDF has 24 helicopters, 5 planes among a total of 2372 other</p>	<p>threat to HCV 4 caused by management activities in the area under assessment.</p>
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		<p>vehicles for firefighting. 776 fire-watch towers are established. And 19.000 personnel have fire-fighting prioritized assignments.</p> <p>Legal regulations on the preparation of forest management plans include sections on the methods to determine and plan the forest areas, which are to be designated as erosion mitigation and hydrologically functioning forest areas. Legislation on protected sites is considered to be well implemented (See category 1, indicator 1.9 has been designated as specified risk based on lack mapping of valuable sites that should be under protection. However, for areas that have been protected legislation is considered to be well implemented).</p> <p>Foresters in Turkey prefer coniferous trees in afforestation for soil conservation and erosion prevention. However, some studies suggest that plantation of broad-leaved trees in 'degraded' forest areas and in erosion control areas would be more appropriate (112). Another study states the lack of long-term studies of hydrology on basin-scale as another handicap, hindering our understanding of the hydrological aspects which should direct forest management efforts (113). This study lists the wrong approaches and applications towards hydrologic management. Among them are:</p> <ul style="list-style-type: none"> - No or limited consideration of local people and local organizations: contradiction of targets of the management with the needs of local people; not including any educational activities for locals. - Instead of using natural solutions, preference of artificial ones: for instance, instead of using natural vegetation along the rivers, concretion (using concrete walls and turning the river into a canal) of the rivers. <p>Thus, it is unclear whether the long term effect of forestry can lead to damage to forest hydrology and water catchment areas which might lead to a reduction of water quality and human health. Thus, based on a precautionary approach the risk is considered specified for production forests.</p> <p>However, the amelioration practices that can take place within protected forest are low in scale, without having a great impact and risk for HCV 4. Therefore, protected forest are considered low risk.</p> <p>Risk Specification Production forest Specified risk. Threshold (22) is met: HCV 4 areas are identified and/or its occurrence is likely in the area under assessment, and it is threatened by management activities.</p> <p>Protected forest Low risk. Threshold (20) is met. There is low/negligible threat to HCV 4 caused by management activities in the area under assessment.</p>		
3.5 HCV 5	59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70,	<p>Occurrence</p> <ol style="list-style-type: none"> 1. Forest areas as sources of non-timber forest products (NTFP) 2. Forest areas as sources of fuel-wood 3. Forest areas used for livestock grazing in the Aegean and Mediterranean region. 	Natural forest Plantation	Specified risk. Natural forest. Threshold (26) is met: HCV 5

<p>71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 103, 116, 117, 118</p>	<p>4. Traditional production land</p> <p>As of 2015 there are 22,343 forest villages in Turkey, where a total of 7,096,483 people live within or near forests (60). There is almost no forest area without a forest village within or neighbouring it. Forest villagers' main benefits from nearby forests are fuel-wood, grazing for their livestock, and earning salaries for seasonal work in forest jobs provided by local Forest Management Units (61). These incomes correspond to 14% of their total income directly and 70% indirectly, through obtaining food from forest areas and selling of animal products (61). To evaluate the information available on HCV 5 as elements fundamental to satisfying basic needs, the different types of use of forest resources are outlined below.</p> <p>Hunting is regulated by the General Directorate of Nature Protection and Natural Parks (DNP). Hunting by forest villagers is seldom for the purpose of satisfying their need for meat, but rather for recreational purposes (i.e. 62, 63). Forest management plans take into account the need of forest villagers for wood/timber that can be used as building material, and estimate the needs and potential supplies to provide for this need by requesting that villagers pay only the harvesting costs. This is also applicable when timber is actioned (Forest Law, art. 31-34). All forest management units have their timber storage areas where the harvested timbers are stored. They provide forest villagers with wood/timber from these storage areas. In case they cannot provide it, or the villagers ask for a payment instead, the forest management unit pay the value of the timber, with reduction of extraction costs. (Forest Law, article 31-34)</p> <p>Use of forest resources for building materials by the forest villagers have been much higher in the past and is not considered as HCV5 (104).</p> <p>Forest areas as sources for non-timber forest products (NTFP): forest villagers in Turkey depend on many types of NTFPs to meet their daily needs. The documented production of NTFPs in Turkey increased from 120,000 tonnes in 2011 to 350,000 tonnes in 2015. Almost half of this production is represented by honey and chestnuts (64). Other NTFPs/species include laurel, thyme, rosemary, sage, linden, sweetgum, pine nuts, carob, blueberries, Galanthus spp., Geranium spp., rose hips, resin, erica, moss, Buxus spp., etc. Statistics on all of the products produced, production amounts and locations are available for the period 1998-2015 (60). There is also a dedicated Department of Non-Timber Forest Products and Services, founded in 2013, within the GDF, which is responsible for the inventory, planning and management of NTFPs. This department also runs a dedicated database of NTFPs, called BIYOD. As of 2015, the department has included 15,000 individual data entries belonging to 2,500 taxa, representing 838,000 hectares of forest (65). The department has also completed action plans for several plant-based NTFPs, such as honey production forests, orchid tubers, mastic, truffles, laurel and wild forest fruit trees (65, 66, 67, 68, 69, 70, 71). In these action plans, the biological, ecological and production-related features of the specific NTFP is given, as well as its current known distributions in Regional Forest Directorates. The GDF's 3-5 year projections are provided, with specific quantitative targets given for each NTFP. The GDF is continuing to produce such action plans for NTFPs, and also produces management plans in specific areas. Satisfying the needs, and providing economic benefits to, local forest villagers is one of the main focuses of these plans. However, there are no specific data on the level of dependence of forest villagers on NTFPs, neither at the local or the regional level.</p>	<p>is identified and/or its occurrence is likely in the area under assessment and these areas are threatened by management activities.</p> <p>Low Risk Plantation Threshold (23) is met: There is no HCV 5 identified and its occurrence is unlikely in the area under assessment.</p>
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	<p>Forest areas as sources of fuel-wood: all forest management plans account for supply of fuel-wood for forest villagers and allocate relevant timber production to that purpose. Such forest areas are planned as part of economically functioning forests, and there is a dedicated management class for those areas where the forest is managed for production of fuel-wood. The total timber production was from 2010-2015 at an average of 20.5 million cubic metres per year, and approximately 30% of this was fuel-wood (61). The share of firewood decreased from 36% in 2010 to 23 % in 2015. In absolute official firewood production decreased from 7.2 million cubic metres in 2010 to 5 million cubic metres in 2015 (118). Half of this production is sold to forest villagers at a deeply discounted price to satisfy their fuel-wood needs, and one third of it is sold to forest villagers or their cooperatives at cost, for them to sell on the market; they are permitted to keep the profit (65).</p> <p>Livestock grazing: livestock grazing is practiced all over Turkey, including in forest villages, but as most important for the villagers/nomadic people in the Aegean and the Mediterranean region (117). There are laws regulating the amount of grazing within forest areas, and forest management plans do take into consideration the pressure of grazing in forest areas. They determine areas in which grazing is allowed, and they build fences around areas under regeneration to keep livestock out. They also give subsidies to convert herds from being predominantly made up of goats to cattle, which have been found to be less harmful to forests. Though there are nomadic people with very large numbers of livestock, mainly goats, in the eastern part of the Mediterranean Region, they have long been using forest areas for grazing their livestock. Recently, forest management plans have designated migratory routes through forests for these nomadic herds to use (59).</p> <p>Another culturally significant object is traditional production lands, which may be called traditional agro-ecological areas, where traditional farming, orchards and livestock grazing are interconnected with neighboring forest vegetation especially the Mediterranean maquis in the western Mediterranean region. These types of natural lands have formed through centuries long human settlement and preserved modes of production still found in certain areas. However, there is little data on these types of areas (103, 106).</p> <p>HCV 5 is present and relevant to all Turkish forests, however, there are certain parts of Turkey in which the relation of local people to the forest is much more intimate. This is especially pronounced in the Eastern Black Sea forests, where villages are made up of houses spread sparsely through forest areas, and families share the forests for beekeeping, obtaining fuel-wood, livestock grazing etc. (72, 76, 79, 82).</p> <p>Threats and Safeguards Identification and Evaluation</p> <p>There have been local studies that have quantified some aspects of the dependence of the forest villagers on products provided by forests as well as the positive or negative effects of forest management (76, 77). Also due to an incomplete cadastre (as of 2015, cadastral surveys have been completed for 17.8 million hectares of forests), this high dependence on forests can be poorly managed (78). According to forestry statistics, 16% of forest areas lack cadastral surveys (60).</p> <p>Some NTFPs are only produced directly by the GDF, such as resins, sweetgum oil, laurel, Pinus pinea, linden, buxus, acorn, carob, mushrooms (105), but most others are produced by forest villagers. Forest villagers have to</p>	
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		<p>pay a tarified price, which is usually very low, to the local forest office to collect and sell certain NTFPs, the main reason for which is to monitor and control the amount of production. Although the Department of Non-Timber Forest Products and Services has been more active in recent years in inventorying and controlling the production of NTFPs, there is still not much information on the potential and realised production of NTFPs in Turkey. Forest management does not limit or ban the use of NTFPs for forest villagers' own needs. There are regulations, though, for the selling of NTFPs, as explained above, but these do not restrict the use of NTFP.</p> <p>Firewood: through forest management plans, certain forest areas are designated every year, for given specific time intervals, where forest villagers may collect a predetermined amount of fuel-wood. Articles 31-34 of the Forest Law state that timber materials harvested from state forests may be provided at subsidised prices to rural peoples to improve their well-being in a broader sense, and to meet their wood requirements.</p> <p>According to Article 31, the fuel wood needs of forest villagers are met at the cost of harvesting, which includes felling, transporting and stacking. Under Article 31, which is concerned with forest villages situated in productive forest areas, every year from 2000 to 2006, the General Directorate of Forestry, through its local branches, allocated an average 3,995,000 stere (1 stere = 1m³) of fuel wood per year to residents of such villages (74). Further, according to Article 32, which covers forest villagers residing in unproductive forest areas, in the same period the GDF's local branches provided an average of 220,000 stere (1 stere = 1m³) of fuel wood (74). The need of forest villagers for fuel-wood is not adequately met in all regions, and this is apparent from the amount of fuel-wood obtained illegally, estimated to have been, on average between 2002 and 2011, 5,245,000 stere per year (1 stere = 1m³) (75). Quantitative data on the amount of fuel-wood provided to forest villagers at the local or regional levels can be obtained from the records of each Forest Management Unit. However, data on the amount of fuel-wood needed by households at the local or regional scale is not present. Note, however, that the need for fuel-wood is decreasing due to an increase in the availability and use of other types of energy, such as gas or coal, in forest villages (72, 65, 75). Still the basic need of the villagers is considered to be at risk of not being covered, leading to illegal logging.</p> <p>Grazing: Livestock grazing has had a long-lasting effect on the forests by decreasing the regeneration rates in both lower and higher altitude forests (61). Livestock grazing in most forest areas is illegal, and this has led to illegal grazing activities due to local people's dependence. Where allowed, grazing is regulated through management plans. However, due to a general socio-economic trend in Turkey, animal husbandry has declined significantly. Hence, in the period 1937-2006, a total of 297,932 unique cases (4,256 cases/year) of illegal grazing in forests were documented, while for the period 2007-2011, that total fell to 11,549 unique cases, or 1,924 cases/year (81).</p> <p>As overgrazing has negatively affected understory vegetation foresters have tried to avoid this, sometimes through fencing off huge areas of forest. During the last decade, this overgrazing has diminished significantly in many parts of the country due to emigration from rural areas of Turkey, but it still continues in other parts. Once foresters regarded livestock, and especially goats, as the 'enemies' of the forest, but now they usually accept their presence up to a certain intensity; a degree of grazing has beneficial outcomes for forests.</p>		
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		<p>Forest management plans are expected to determine HCV 5 areas through preliminary meetings with local people and communities (59). This process identifies the specific areas, periods and extent of utilisation of these areas and designates them as socio-culturally functioning forests. The forest plans have been implementing 'grazing plans' in such areas in which abundant grazing occurs or in which nomadic people live. These grazing plans designate grazing areas and migration routes among forest areas for the continuation of traditional grazing activities. The forest management directorates and forest planners usually perform these preliminary meetings as required, especially where the livestock grazing is abundant. But the results of these do not always necessarily benefit the livestock grazing as regeneration of forest areas might take preference to access of grazing. Livestock grazing is decreasing, and today there is a greater focus on avoiding conflicts between foresters and people using the forest for grazing. However, there is still a risk that forestry affects local people negatively (Personal communication 18)</p> <p>Traditional production lands where Mediterranean maquis are intertwined with farms and orchards may be subject to afforestation with Turkish pine, since areas vegetated with maquis are considered to be degraded. Such interventions through forest management put the traditional intertwined production methods of local people at risk. These areas should be identified through stakeholder consultation with local people. There is one known case of these not having been identified in forest management plans (115). These traditional production lands are not well studied and it has not been possible to identify the distribution and the level of risks on a national scale. Therefore, the risk is considered specified based on a precautionary approach.</p> <p>HCV 5 areas are present in all of the regions under assessment. There are certain areas in which grazing of local livestock may be limited to such an extent that traditional livestock husbandry practices are negatively affected by prohibitive forest management, and there is a risk that the amount of firewood available to villagers may be too low, leading to illegal harvesting. Based on a precautionary approach traditional production lands are considered specified risk due to lack of knowledge.</p> <p>Risk Specification Natural forest: Specified risk. Threshold (26) is met: HCV 5 is identified and/or its occurrence is likely in the area under assessment and these areas are threatened by management activities.</p> <p>Plantation: Low risk. Threshold (23) is met: There is no HCV 5 identified and its occurrence is unlikely in the area under assessment.</p>		
3.6 HCV 6	59, 83, 84, 86, 96, 97, 102.	<p>Occurrence</p> <ol style="list-style-type: none"> 1. Archaeological sites and cultural heritage 2. UNESCO World Heritage Sites 3. Forest areas usually in the vicinity of forest villages 	Country	Low Risk. Threshold (29) is met: HCV 6 is identified

		<p>4. Forests reserved for research and education</p> <p>Turkey is rich in archaeological and cultural sites. Most of these sites are determined by the Ministry of Culture and Tourism and by local conservation boards and are thus declared to be either archaeological sites and/or cultural heritage sites. The Ministry has registered a total of 14,840 sites as culturally and/or archaeologically significant areas as of 2015 (83). Maps and boundaries of recognised sites are obtained by forest planners and put into the relevant forest management plans. These sites are designated as having a nature conservation function and are classified as archaeological/cultural sites in forest management plans; a process which is also explained in the methodological document on making forest management plans (59). Since these areas are designated as having a conservation function, no forestry operations are permitted in these areas. For instance, in the integrated forest management plan of the Şavşat Forest Management Unit within the Artvin Regional Forest Directorate, a spruce forest, which was declared as an Archaeological Site in 2013 by the Ministry of Culture and Tourism, is also designated as a Nature Conservation area (96). There are 14 cultural and two cultural-natural registered UNESCO World Heritage Sites in Turkey.</p> <p>In addition to these areas, there are forests usually in the vicinity of forest villages in which the villagers do not allow for production of timber or any other forestry operations. Such small forest areas are usually made up of old trees and have been protected for a long time for recreational or safety reasons. These forests are loved and protected by villagers and as an additional benefit it is considered to have protection value, such as protection from floods or avalanche. Therefore, these forests are considered to be HCV6.</p> <p>Some areas have been set aside for research and education as also considered HCV6 (Consulted expert 12).</p> <p>Threats and Safeguards Identification and Evaluation</p> <p>Forest management plans designate archaeological sites as having natural and historical functions, and no timber production is permitted on these sites. Forests reserved for research and education are also designated as such, and no timber production or other forest management operations are allowed. Archaeological, cultural and historical sites of national and international concern are mapped and catalogued by the Ministry of Culture and Tourism. These areas are also taken into account by forest management plans, and no forestry operations are allowed in such areas. Turkey has been home to many civilisations for thousands of years, and new sites are discovered every year, so there may be risk for sites not having been mapped. Forest planners request information about the presence of such areas within the planning unit from the relevant ministries and if the sites are not mapped they will not be included in forest management plans. Therefore, there is a risk of archaeological, cultural and historical sites not being included completely in forest management plan. However, based on stakeholder consultations with the Ministry of Culture and Tourism and forest planners, this does not seem to be a large scale problem leading to the systematic destruction of such sites and there is no information about the risks of damaging such sites due to forestry operations (Consulted expert 12).</p> <p>Also for UNESCO World heritage sites the forest planners obtain information on these sites from the Ministry of Culture and Tourism about the locations of these sites and types of forestry operations allowed. Usually these areas are designated as nature conservation or socio-cultural function areas in the management plan and no</p>	<p>and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities</p>
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	<p>forestry operation is done close to the cultural value. This requirement has been strictly implemented, but in the peripheries of such sites afforestation can be allowed. Forest management plans can be reviewed for details (Consulted expert 12).</p> <p>Based on general observation, corroborated by expert consultation of this CNRA it is considered, that even though the culturally or conventionally protected forest areas in the vicinity of forest areas are not systematically mapped, the risk of these areas being affected by forest management is low. Stakeholder consultation is done prior to development of management plan, which is part of identifying these areas to use in the forest management plans. The villagers do not have a legal entitlement to reject harvesting in these areas, However, the forest areas in vicinity of the forest village and traditionally protected by local people are often small and forest managers generally try to keep a good relationship with local villagers, and respect these forests.</p> <p>Risk Specification Low Risk. Threshold (29) is met: HCV 6 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities.</p>		
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Recommended control measures

The recommended control measures here are only indicative in nature, and are not mandatory. Organizations shall evaluate and devise appropriate control measures to mitigate the risks identified in this risk assessment as applicable.

Indicator	Recommended control measures
3.0	N/A
3.1 HCV 1	<p>HCV 1 should be identified in Forest management plans.</p> <p>A potential tool ensure HCV 1 identification could be the Biodiversity Integration Scheme: Adoption and widespread integration of biodiversity data into forest management planning would enable identification of HCV 1 areas in managed forests. Integration of biodiversity conservation data into forest management provides forest managers with maps of areas with HCV 1, delineates the present species, summarises the special properties of these areas, identify management constraints and gives management guidelines. In some areas timber production is restrained, and these are designated as total conservation forests. Others are designated as biodiversity conservation priority forests where timber production should follow the guidelines included at the forest-stand scale into the management plans. These guidelines include:</p> <ul style="list-style-type: none"> - Characteristics of the forest habitat that should be conserved and left unharmed - When to perform limited timber production so as not to disturb the seasonal activities, especially reproduction, of present forest species - Other special limitations. <p>Training records should prove that training on the requirements for protection of HCV values are being conducted.</p> <p>If logging has taken place within an area mapped as HCV 1, photo documentation, records, or field visits should verify that HCV 1 values have been protected.</p> <p>Forest managers prepare yearly worksheets summarising the forest operations in their planning unit. If HCV1 areas have been identified in management plans these worksheets should be checked to see if forest operation was undertaken which may have led to damage of designated HCV1 areas. If no HCV1 values are included in the forest management plan, then this should be identified through field visits.</p>
3.2 HCV 2	Sourcing from areas where management activities do not contribute / increase HCV fragmentation.

	<p>Presence of HCV 2 should be determined and included in Forest Management plans if present. This can be done through studying the extent and properties of the forest using forest maps, backed up with field assessment and interviews with local forest managers.</p> <p>Road building should not contribute to fragmentation in large connected areas.</p> <p>Adoption and widespread integration of biodiversity data into forest management planning would enable identification of HCV 2 areas in managed forests. Biodiversity Integration Scheme provides forest managers with maps of HCV 2 areas. The planning and application for new road building would take into account the outcomes of the integration study to prevent fragmentation of HCV 2 areas and can be used to verify whether HCV2 are present in an area.</p> <p>Forest managers prepare yearly worksheets summarising the forest operations in their planning unit. If areas are designated as HCV2 value, then checking these worksheets to see if any forest operation was undertaken, which may have led to fragmentation, would be possible for those planning units where clearly designated HCV 2 areas are indicated in the forest management plans.</p> <p>The Forest Stand Maps belonging to 1,340 Forest Management Units, covering all of Turkey, are in digital format, and give information on forest canopy cover, dominant tree composition and age classes at the stand level (1-3 ha). A GIS analysis of these forest maps, present in the archives of the Department of Forest Management and Planning provides important data on HCV 2 areas, with specific size and fragmentation criteria.</p>
3.3 HCV 3	<p>Material does not originate from areas where HCVs are present, OR -Sourcing is from areas where specific measures are in place that are designed to protect the HCV inherent in the ecosystem</p> <p>HCV 3 should be identified in forest management plans. A potential tool ensure HCV 3 identification could be the Biodiversity Integration Scheme: Adoption and widespread integration of biodiversity data into forest management planning would enable identification of HCV 3 areas in managed forests. Biodiversity Integration Scheme provides forest managers with maps of HCV 3 areas. Forests with HCV 3 areas can be included in nature conservation forests where no timber production takes place or where specific measures are dictated in the forest plans to protect HCV 3 in the ecosystem.</p> <p>Forest managers prepare yearly worksheets summarising the forest operations in their planning unit. Checking these worksheets to see if any forest operation was undertaken which may have led to damage to HCV 3 areas would be possible for those planning units where clearly designated HCV 3 areas are indicated in the forest management plans.</p> <p>The presence and distribution of forest areas made up of or dominated by endemic trees should be determined and integrated into forest management plans.</p> <p>Training records should prove that training on the requirements for protection of HCV values are being conducted.</p> <p>If logging has taken place within an area mapped as HCV 3, photo documentation, records, or field visits should verify that HCV3 values have been protected.</p> <p>If no HCV3 values are included in the forest management plan, then this should be identified through field visits.</p>
3.4 HCV 4	<p>It is important to remember that the appropriate way to maintain or enhance each value will depend on the value itself. There are a variety of possible options to maintain or enhance various HCVs, which include:</p> <ul style="list-style-type: none"> • Strategies to protect any water catchments of importance to local communities located within or downstream of the Management Unit, and areas within the unit that are particularly unstable or susceptible to erosion. Examples may include protection zones, harvest prescriptions, chemical use restrictions, and/or prescriptions for road construction and maintenance, to protect water catchments and upstream and upslope areas. • Measures to restore water quality and quantity are in place. • Strategies to maintain or enhance carbon sequestration and storage are in place.
3.5 HCV 5	<p>Sourcing from forests where there is documentation confirming local communities' or indigenous peoples' engagement and accommodation.</p>

	<p>Firewood made available for local villagers should match demand of the villagers. Forest manager should provide records of consultation with villagers showing that the actual demand for firewood has been considered when setting the limit for timber available for firewood. If this cannot be presented, consultation with local villagers should be conducted to verify sufficient supply of firewood in the area.</p> <p>Presence of inhibitory forest management on grazing activities should be verified through consultation with local communities and forest chiefs in charge of the management of the given forest area.</p> <p>If maquis areas are present, then stakeholder interview should verify whether there is a presence of traditional agricultural systems. If traditional agricultural systems are present, then it should be verified with forest manager that the areas will not be converted.</p>
3.6 HCV 6	N/A

Information sources

No.	Source of information	Relevant HCV category and indicator
1	Myers, N., Mittermeier, R.A., Mittermeier, C.G., daFonseca, A.B., Kent, J. 2000. Biodiversity hotspots for conservation priorities. Nature, 403: 853-858.	3.0, 1, 2, 3
2	Iucn.org (N.Y): IUCN redlist of threatened species. (threatened forest species in Turkey filtered from IUCN red List). Available at: http://www.iucnredlist.org/search	3.0, 1, 2, 3
3	Ekim, T., Koyuncu, M., Vural, M., Duman, H., Aytaç Z., Adıgüzel, N. 2000 Red List of Plants in Turkey, Ankara.	3.0, 1, 2, 3
4	Karaçetin, E. and Welch, H.J. 2011. Red Book of Butterflies in Turkey. Nature Conservation Centre, Ankara.	3.0, 1, 3
5	http://www.nuhungemisi.gov.tr (N.Y) Noah's Ark. National biodiversity database. Ministry of Forestry and Water Affairs, Department of Information Technologies. Available at: www.nuhungemisi.gov.tr/Giris/index_en.aspx	3.0, 1,2, 3
6	Ministry of Forest and Water Affairs. 2011 National Biodiversity Monitoring Report. (in Turkish)	3.0, 1,2, 3
7	Eken, G., Bozdoğan, M., İsfendiyaroğlu, S, Kılıç D.T., Lise, Y. (ed.) 2006. Key Biodiversity Areas of Turkey. Nature Society, Ankara (in Turkish).	3.0, 1, 2, 3
8	Özhatay, N., Byfield, A., Atay, S. 2003. Important Plant Areas in Turkey, WWF-Türkiye, İstanbul. (in Turkish)	3.0, 1, 2, 3
9	Kılıç, D.T., Eken, G. 2004. Key Bird Areas of Turkey. Nature Society, Ankara. (in Turkish)	3.0, 1, 2, 3
10	Karaçetin, E., H.J. Welch, A. Turak, Ö. Balkız and G. Welch. 2011. Conservation Strategy for Butterflies in Turkey. Nature Conservation Centre, Ankara.	3.0, 1, 2, 3
11	Turak, A., Balkız, Ö., Ambarlı, D., Durmuş, M., Özkil, A., Yalçın, S., Özüt, D., Kınıkoğlu, Y., Meydan Kocaman, T., Cengiz, S., Albayrak, F., Kurt, B., Zeydanlı, U., Bilgin C. 2011. Systematic Conservation Planning of Black Sea Region. Nature Conservation Centre, Ankara. (in Turkish)	3.0, 1, 2, 3

12	Zeydanlı, U.Z., Welch, H.J., Welch, G.R., Altıntaş, M., Domaç, A. 2005. Gap Analysis and Priority Conservation Area Selection for Mediterranean Turkey: preliminary technical report, Turkish Foundation for Nature Conservation (WWF-Turkey), İstanbul, Turkey.	3.0, 1, 3
13	Welch, H. J. ed. (2004) Southeast Anatolian Region Biodiversity Research Project 2001-2003 Final Report. Turkish Society for the Conservation of Nature. İstanbul, Turkey. (in Turkish)	3.0, 1, 3
14	Çiçek, E. 2004. Characteristics of forested wetlands and forested wetlands of Turkey. İstanbul University Forestry Journal B-54(2): 107-111.	3.0, 3
15	Terzioğlu, S., Bilgili, E., Karaköse, M. 2012. Forests of Turkey. General Directorate of Forestry Publication, Ankara.	3.0, 3
16	Karaer, F., Terzioğlu, S., 2012. Hatila Valley National Park Long Term Development Plan. Analytical Study Report. Middle East Forestry Ortadoğu Ormancılık Proje Etüt ve Müşavirlik Ticaret A.Ş. (ODOPEM), Ankara.	3.0, 2, 3
17	Anonymous. 1999. Küre Mountains National Park Proposed Development Plan. Ministry of Forestry, Directorate of Nature Conservation and Game-Wildlife Management, Ankara.	3.0, 2
18	Yurdakul, E., ve Özhatay, N. 2005. West Küre Mountains, 100-102. 122 Important Plant Areas of Turkey. WWF-Turkey. İstanbul (in Turkish)	3.0, 1, 2
19	Kalem, S. 2005. Küre Mountains. National Geographic Turkey - Hotspots of Turkey supplement. İstanbul (in Turkish).	3.0, 1, 2, 3
20	Kurdoğlu, O. 2002. Investigations on Natural Resource Management of Kaçkar Mountains National Park and its Environs. PhD Thesis. Karadeniz Technical University, Institute of Natural Sciences, Trabzon (in Turkish)	3.0, 1, 2, 3
21	Özüt, D., Tufanoğlu, G.Ç., Zeydanlı, U., Bilgin, C.C. (ed.) Integration of Biodiversity Conservation into Forestry: Priority Species and Ecological Processes in Forest Ecosystems. Nature Conservation Centre, Ankara. (in print).	3.0, 2, 3
22	Yalçın, G. 2006. Istranca Mountains. In: Eken, G., Bozdoğan, M., İsfendiyaroğlu, S, Kılıç D.T., Lise, Y. (ed.) 2006. Key Biodiversity Areas of Turkey. Nature Society, Ankara (in Turkish).	3.0, 2
23	Kurdoğlu, O., Lise, Y. 2006. Northeast Black Sea Forests in Eken, G., Bozdoğan, M., İsfendiyaroğlu, S, Kılıç D.T., Lise, Y. (ed.) 2006. Key Biodiversity Areas of Turkey. Nature Society, Ankara (in Turkish).	3.0, 2
24	Diker, H., Diker, E., Özalp, M., Avcioğlu, B., Kalem S. The Status of Bezoar Goat (Capra aegagrus) in the Kaçkar Mountains, Turkey. 2009. In Zazanashvili, N., Mallon, D. (ed.) 2009. Status and Protection of Globally Threatened Species in the Caucasus. Tbilisi: CEPF, WWF. Contour Ltd., 232 pp	3.0, 2
25	Lise, Y. 2006. Akseki-İbradı Forests. In: Eken, G., Bozdoğan, M., İsfendiyaroğlu, S, Kılıç D.T., Lise, Y. (ed.) 2006. Key Biodiversity Areas of Turkey. Nature Society, Ankara (in Turkish).	3.0, 2
26	Lise, Y. 2006. Amanos Mountains. In: Eken, G., Bozdoğan, M., İsfendiyaroğlu, S, Kılıç D.T., Lise, Y. (ed.) 2006. Key Biodiversity Areas of Turkey. Nature Society, Ankara (in Turkish).	3.0, 2, 3
27	Aytaç, A.S., Semenderoğlu, A. 2012. The assessment of the central part of the Amanos mountains in terms of nature protection criteria. Journal of Anatolian Natural Sciences, 3(1): 1-14. (in Turkish)	3.0, 2, 3
28	Güzelmansur, A., Lise, Y. 2013. Biodiversity of Amanos Mountains. Mustafa Kemal University Journal of Agriculture Faculty, 18 (2): 55-68.	3.0, 2, 3
29	Maesano, M., Lasserre, B., Masiero, M., Tonti, D., Marchetti, M. 2016. First mapping of the main high conservation value forests (HCVFs) at national scale: The case of Italy. Plant Biosystems, 150 (2) 208–216.	3.0
30	http://land.copernicus.eu (2017). CLC 2012. Copernicus, Land Monitoring Service. Available at: http://land.copernicus.eu/pan-european/corine-land-cover/clc-2012	3.0

31	Özyavuz, M. 2008. Planning of İğneada-Demirköy part of Yıldız Mountains as a biosphere reserve. PhD Thesis. Ankara University, Faculty of Natural Sciences, 173 pg. (in Turkish).	3.0, 3
32	Tırlı, A. 2006. İğneada. In: Eken, G., Bozdoğan, M., İsfendiyaroğlu, S, Kılıç D.T., Lise, Y. (ed.) 2006. Key Biodiversity Areas of Turkey. Nature Society, Ankara (in Turkish).	3.0, 3
33	Özhatay, N., Akalın, E., Güler, N., Ersoy, H., Yeşil, Y., Demirci, S. 2013. Floristic richness and conservation priority sites in the northwest of European Turkey: Mt Yıldız-Kırklareli	3.0, 3
34	Kavgacı, A., Özalp, G., Özhatay, N. 2007. Flora of İgneada floodplain forests (longozes) and their surroundings. İstanbul University Journal of Forest Faculty A, 57(2): 61–90. (in Turkish)	3.0, 3
35	Kavgacı, A., Carni, A., Tecimen, H.B., Özalp, G. 2011. Diversity of floodplain forests in İğneada region (NW Thrace - Turkey). Hacquetia, 10 (1): 73–93.	3.0, 3
36	Özyavuz, M., Yazgan, M.E.2010. Planning of İğneada Longos (Flooded) Forests as a Biosphere Reserve. Journal of Coastal Research, 26 (6): 1104-1111.	3.0, 3
37	Byfield, A.J., Özhatay, N., 1995, Towards the conservation of Turkey's Northern sand dunes. DHKD/FFKD/FFPS, İstanbul.	3.0
38	birdlife.org (2017) Key Biodiversity Areas (KBAs) and Important Bird and Biodiversity Areas (IBAs) . Available at: http://www.birdlife.org/worldwide/programmes/sites-habitats-ibas	3.0
39	Plantlife International, 2010. Important Plant Areas Around the World: Target 5 of the CBD Global Strategy for Plant Conservation. United Kingdom.	3.0, 1, 3
40	IUCN, 2016. A Global Standard for the Identification of Key Biodiversity Areas, Version 1.0. First edition. Gland, Switzerland: IUCN.	3.0, 1, 2, 3
41	MFWA, 2012. Çoruh River Watershed Rehabilitation Project. Ministry of Forestry and Water Affairs. Ankara (in Turkish)	3.0, 3, 4
42	Akman, Y. 1972. The vegetation of Beynam Forest. Communication of the Faculty of Science of Ankara University. C1, 16 C, 29-53. (in Turkish).	3.0, 3
43	Kurum, E. 1992. A Research Study on the Beynam Protection Forest and its Environs to Determine the Principles of Planning for a Balanced Use-Conservation Regime. PhD Thesis. Ankara University, Faculty of Natural Sciences, 161 pg. (in Turkish).	3.0, 3
44	Anonymous, 2011. Long Term Development Plan of Yozgat Pinary National Park: Analytical Study Report and Planning Results. Ministry of Environment and Forestry, Ankara. (in Turkish)	3.0, 3
45	Sever, S. 1998. A study on conservation, utilization and development principles of Yozgat pine grove national park. Master Thesis. Ankara University, Faculty of Natural Sciences. (in Turkish)	3.0, 3
46	Ürker, O. 2014. Anatolian sweetgum forests within the concept of environmental ethics. PhD Thesis. Ankara University, Institute of Social Sciences. (in Turkish).	3.0, 3
47	DKM, 2010. Landscape Analysis of the oriental sweetgum forests in Köyceğiz-Dalyan Special Environmental Protection Area. Ankara, Turkey (in Turkish).	3.0, 3
48	Avci. M. 1996. A new distribution area of an endemic oak species Quercus vulcanica in Turkey. Turkish Geography Journal, 31: 283-289. (in Turkish).	3.0, 3
49	Aydınöz, D. 2004. A second distribution area of kasnak oak (Quercus vulcanica) in Turkey. Marmara University Journal of Geography, 9: Coğrafya Dergisi, sayı: 9.	3.0, 3

50	Özen, M., Fakir, H. 2015. Kasnak oak Nature Protection Area and the flora of its surroundings. Suleyman Demirel University, Journal of Faculty of Sciences, 19(3):48-65.	3.0, 3
51	Özel, N. 1998. Phyto-sociological and phyto-ecological studies on forest vegetation in Kaz Mountains. PhD Thesis. Ege University, Faculty of Natural Sciences, 187 pg.	3.0, 1, 3
52	Ata, C. 1975. Distribution and silvicultural features of Kazdağı fir (Abies equitrojani) in Turkey. Istanbul University Journal of Forestry Faculty, 24 (11): 165-219.	3.0, 3
53	Velioğlu, E., Kaya, Z., Çiçek, F.F., Çengel, B. 1998. Genetic variation in natural Kazdağı fir (Abies equi-trojani) populations sampled from Kaz Mountains. General Directorate of Forestry, Publication No: 74, Ankara. (in Turkish).	3.0, 3
54	Kurdoğlu, O. ve Oktan, E., 2000. The Old Growth Forests of North East Turkey, Moser, G., Pol, E., Bernard, Y., Bonnes, M., Corraliza, J. and Giuliani, M.V. (eds.), Metropolis 2000 - Which Perspectives? Cities, Social Life and Sustainable Development (IAPS 16 Conference Proceedings on CD-Rom), 4-7 July 2000.	3.0, 3
55	Kurdoğlu, O. ve Zeydanlı, U., 2008. Chapter 5: The wisest forests - Old growth forests. In: Ülgen, H., Zeydanlı, U. 2008. Forest and Biodiversity.. Nature Conservation Centre, Ankara. (in Turkish).	3.0, 3
56	Kurdoğlu, O., 2000. The last remaining treasures: Old-growth forests. TEMA Society. Publication 7 (22): 42-44. (in Turkish)	3.0, 3
57	Kurdoğlu, O., 1996. Old-growth forests of Northeastern Black Sea Region. Society for the Conservation of Nature. İstanbul, ISBN 975-96081-2-2, 24 pg. (in Turkish)	3.0, 3
58	Anonymous, 2000. Nature Conservation Areas of Turkey. Society for the Rural Environment and Forestry Research. UNDP, Ankara, 166 pg. (in Turkish)	3.0, 3
59	GDF, 2014b. Methods and Principles for Making Ecosystem Based Functional Forest Management Plans: Regulatory Document No: 299. General Directorate of Forestry. Ankara (in Turkish)	3.0, 1, 2, 3, 4, 5, 6
60	ogm.gov.tr (N.Y). Forestry statistics reached from GDF website. Available at: https://www.ogm.gov.tr/ekutuphane/Sayfalar/Istatistikler.aspx	3.0, 5
61	GDF, 2004. National Forestry Program. General Directorate of Forestry. Ankara. (in Turkish)	3.0, 5
62	Elmas, H. 2008. Socio-cultural structure of people committing crimes against the law regulating terrestrial hunting in Turkey: An exemplary study from Denizli province. Master's Thesis. Turkish Military Academy, Defense Sciences Institute, Ankara, 166 pg. (in Turkish).	3.0, 5
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64	GDF, 2015c. Annual Activity Report. General Directorate of Forestry, Ankara. (in Turkish)	3.0, 5
65	MFWA 2015. Performance Program of General Directorate of Forestry. Ministry of Forestry and Water Affairs, Ankara, 99 pg. (in Turkish)	3.0, 5
66	MFWA , 2013. Honey production forests action plan. General Directorate of Forestry. Ministry of Forestry and Water Affairs, Ankara. (in Turkish).	3.0, 5
67	MFWA , 2015. Laurel action plan. General Directorate of Forestry. Ministry of Forestry and Water Affairs, Ankara. (in Turkish).	3.0, 5

68	MFWA , 2013. Mastic action plan. General Directorate of Forestry. Ministry of Forestry and Water Affairs, Ankara. (in Turkish).	3.0, 5
69	MFWA , 2013. Orchid tubers action plan. General Directorate of Forestry. Ministry of Forestry and Water Affairs, Ankara. (in Turkish).	3.0, 5
70	MFWA , 2013. Truffle mushroom action plan. General Directorate of Forestry. Ministry of Forestry and Water Affairs, Ankara. (in Turkish).	3.0, 5
71	MFWA , 2013. Wild forest fruit trees action plan. General Directorate of Forestry. Ministry of Forestry and Water Affairs, Ankara. (in Turkish).	3.0, 5
72	Alkan, S. 2014. The impacts of rural population changes on forests and forestry: A case study in Trabzon province. Kastamonu University Journal of Forestry Faculty, 14 (1): 69-78. (in Turkish)	3.0, 5
73	Anonymous, 2001. 8th Five-Year Development Plan: Forestry Sector Specialisation Commission Report. Ministry of Development, Ankara. (in Turkish)	3.0, 5
74	Güneş, Y., Ok, K. 2010. Does legislation cause externalities in timber selling? A case from Turkish timber market. Scientific Research and Essays, 5(13): 1720-1728.	3.0, 5
75	Anonymous, 2014. 10th Five-Year Development Plan: Forestry Sector Specialization Commission Report. Ministry of Development, Ankara. (in Turkish)	3.0, 5
76	Alkan, S., Toksoy D., 2008. Socio-economical structure of forest villages: Example of Trabzon Province. Kastamonu University Journal of Forestry Faculty, 8 (1): 37-46. . (in Turkish)	5
77	Toksoy, D., Ayaz, H., Şen, G., Özden, S. 2005. Forest-villager relationship in Eastern Black Sea Region. Kafkas University Artvin Journal of Forestry Faculty, 6 (1-2): 79-85. . (in Turkish)	5
78	Gençay G. 2012. Legal Studies on Actual Problems of Forest Cadastre. Journal of the Faculty of Forestry, Istanbul University. 62 (2): 173-195. (in Turkish)	3.0, 5
79	Yılmaz, A. 1997. Status of agricultural land in relation to demography and soil in rural settlements within forests of Eastern Black Sea Region Ondokuz Mayıs University Journal of the Faculty of Education. 10 (1): 273-285. . (in Turkish)	3.0, 5
80	CBD, 2014. UN Convention on Biological Diversity Fifth National Report. Turkish Ministry of Forestry and Water Affairs.	3.0, 3, 5
81	GDF, 2012. General Directorate of Forestry Strategic Plan 2013-2017. Ankara. (in Turkish).	3.0, 5
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83	kulturvarliklari.gov.tr (2017). General Statistics of Turkey Sites. Available at: http://www.kulturvarliklari.gov.tr/TR,44973/turkiye-geneli-sit-alanlari-istatistikleri.html (website of Ministry of Culture, where statistical information is provided).	3.0, 6
84	Ertürk, N., Karakul, Ö. (ed.) 2016. UNESCO World Heritage in Turkey. Turkish National Commission for UNESCO, Ankara, 452 pg.	3.0, 6
85	Tan, A. 2010. Plant genetic resources and conservation in Turkey. Anadolu Journal, 20 (1): 9-37. (in Turkish)	3.0
86	Şat, B. 2006. Functions of arboretums with respect to nature conservation and environmental education: a case study of Atatürk Arboretum. Istanbul University Journal of Forestry Faculty, A-56 (2): 253-270. (in Turkish)	3.0, 6

87	Narlıođlu, H. 2015. Evaluation of the Afforestation and Erosion Control Works in Konya Closed Basin. General Directorate of Combatting Desertification and Erosion, Ministry of Forestry and Water Affairs, Ankara, 432 pg. (in Turkish)	3.0, 4
88	Kryštufek, B., Vohralik, V. 2005. Mammals of Turkey and Cyprus. Rodentia I: Sciuridae, Dipodidae, Gliroidae, Arvicolinae. Zalozba Annales, Koper, Slovenia.	3.0, 1, 2, 3
89	Turan, N. 1981. Game and Wildlife Animals of Turkey – Mammals. Ar Press, Ankara. (in Turkish).	3.0, 1, 2, 3
90	Turan, N. 1990. Game and Wildlife Animals of Turkey – Birds. General Directorate of Forestry Press, Ankara. (in Turkish).	1
91	Baytař, A. 2007. A Field Guide to Butterflies of Turkey. NTV Press, İstanbul, 218 pg.	1
92	Karaçetin, E. and Welch, H.J. (2011). Red Book of Butterflies in Turkey. Ankara, Turkey: Nature Conservation Centre.	1
93	Baran, I. 2005. Amphibians and Reptiles of Turkey. Turkish Scientific and Technological Research Council Press, Ankara.	1
94	Olson, D.M., Dinerstein, E. 1998. The Global 200: A Representation Approach to Conserving the Earth's Most Biologically Valuable Ecoregions. Conservation Biology, 12 (3): 502-515.	1
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96	GDF, 2013. Functional Forest Management Plan of řavřat Forest Management Unit, Artvin.	6
97	GDF, 2012. Functional Forest Management Plan of Bařkonuř Forest Management Unit, Kahramanmarař.	6
98	Globalforestwatch.org (N.Y). Available at: www.globalforestwatch.org	2
99	Kryřtufek, B., Vohralik, V. 2009. Mammals of Turkey and Cyprus. Rodentia II: Cricetinae, Muridae, Spalacidae, Calomyscidae, Capromyidae, Hystricidae, Castoridae. Koper.	1, 2, 3
100	Hesselbarth, G., van Oorschot, H. ve Wagener, S. 1995. <i>Die Tagfalter der Túrkei</i> . Bocholt, Germany: Selbstverlag Sigbert Wagener.	1
101	Welch, G., Demirci, B., Kirwan, G.M., Boyla, K., Özen, M., Castell, P., Marlow, T., Welch, H. 2008. The Birds of Turkey. Helm Field Guides. 512 pg.	1
102	GDF, 2014c. Technical Regulations of Silvicultural Applications: Regulatory Document No: 298. General Directorate of Forestry. Ankara (in Turkish)	1, 2, 3, 4, 5, 6
103	Nature Society, 2016. Workshop by the Nature Society (local branch) – Seferihisar Nature School – Orhanlı Village, Tyrkey. 7. Feb 2016	5
104	Ince, Y. and Tolunay, A. 2009. Economical Scale of Right of Forest Villagers to Obtain Wood as Building Material. II: Congress of Socio-Economic Problems in Forestry, Isparta, Suleyman Demirel University.	5
105	GDF, 2016. Principles of Inventory, Planning and Selling of NTFPs. Document No:302. Link: https://www.ogm.gov.tr/ekutuphane/Tebliğler/302%20sayılı%20odun%20dışı%20orman%20ürünlerinin%20envanter%20ve%20planlanması%20ile%20üretim%20ve%20satış%20esasları%20Tebliđi.pdf	

106	Kaya, Z., and Raynal, D., 2001. Biodiversity and conservation of Turkish forests. <i>Biological Conservation</i> , 97:131-141.	1
107	Sekercioglu, C.H., Anderson, S., Akçay, E., Bilgin, R., Can, O.E., Tavsanoglu, C., Yokes, M.B., Soyumert, A., Ipekdal, K., Saglam, I., Yucel, M., Dalfes, N., 2011. Turkey's globally important biodiversity in crisis. <i>Biological Conservation</i> 144(12): 2752-2769.	1
108	Zeydanlı, U., Turak A.S., Ormancı, Özü, D., Bilgin C.C. (ed.). Integration of Biodiversity into Forest Management Plans - Guideline for Forest Planners. Ankara, Nature Conservation Centre, 194 pages. (In press)	
109	Özü, D., Tufanoğlu G.Ç., Zeydanlı U., Bilgin, C.C. (ed.) Integration of Biodiversity into Forest Management - Guideline for Forest Managers: Conservation Prior Species and Ecological Processes in Forest Ecosystems. Ankara, Nature Conservation Centre. 300 pages. (In press)	
110	Management Principles for the Avoidance and Extinguishing of Forest Fires. Available at: https://www.ogm.gov.tr/ekutuphane/Tebliğler/285%20Sayılı%20Tebliğ%20(ORMAN%20YANGINLARININ%20ÖNLENMESİ%20VE%20SÖNDÜRÜLMESİNDE%20UYGULAMA%20ESASLARI).doc	4
111	Dunya.com (2017). Ministry of Forestry and Water Affairs ready to fight fire. May 16, 2017. [Online]. Available at: https://www.dunya.com/gundem/orman-ve-su-isleri-bakanligi-yanginla-mucadeleye-hazir-haberi-362954	4
112	Hızal, A., Asan, Ü., 1995. Forest functions and their effects on water productivity in Alibey Dam (Malova river). Istanbul Water Congress and Exhibiton 21-25 June, 309-315.	4
113	Hızal, A., Serengil, Y., Ozcan, M., 2008. The methodology of ecosystem based basin scale planning and wrong applications. Turkish Water Congress. Istanbul.	4
114	Forest Law No: 6831, 1956. Available at. http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf	4
115	Nature Society presentation, 2015. Presentation given at 'Nature School', February 8 2015. Event supported by Global Environmental Fond (GEF).	5
116	Tolunay A., Korkmaz M., Alkan H., 2005. Batı Anadolu Bölgesinin Silvopastoral Sistemleri ve K.I Keçisi Otlamacı Iğ.ındaki Yeri ve Önemi, I. Ulusal Süt Keçiciliği Kongresi (The silvopastoral systems in Western Anatolia and it relation to goat husbandry. First National Milk Goat Husbandry Congress), 26-27 May 2005, s. 191- 197, Ege Üniversitesi, İzmir. Available at: https://www.researchgate.net/publication/286446260	5
117	Cosgun, U. 2014. The Place and Importance of Grazing Plan in Forest Management. National Mediterranean Forest And Environment Symposium "The future of Mediterranean forests: Sustainable society and environment". October 22-24, 2014 - Isparta	5
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Controlled wood category 4: Wood from forests being converted to plantations or non-forest use

Risk assessment

Indicator	Source of information	Functional scale	Risk designation and determination
<p>4.1 Conversion of natural forests to plantations or non-forest use in the area under assessment is less than 0.02% or 5000 hectares average net annual loss for the past 5 years (whichever is less),</p> <p>OR</p> <p>Conversion is illegal at the national or regional level on public and private land.</p>	<p>Legislation: Forest Code of 1956, No: 6831, articles 2, 16, 17, 52, 115, http://www.mevzuat.gov.tr/MevzuatMetin/1.3.6831.pdf</p> <p>Mining Law of 1985, No.3213, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.3213.pdf</p> <p>Turkish Constitution of 1982, article 169, http://www.mevzuat.gov.tr/MevzuatMetin/1.5.2709.pdf, https://global.tbmm.gov.tr/docs/constitution_en.pdf</p> <p>Law on Closing Some Funds of 2001, No: 4629 http://www.mevzuat.gov.tr/MevzuatMetin/1.5.4629.pdf</p> <p>Ammendment 2896 Clause 1 Of 23/9/1983</p> <p>Ammendment No 3302 Clause 1 Of 5/6/1986</p> <p>Sources: General Directorate of National Treasury, www.milliemlak.gov.tr</p> <p>GDF 2008: Annual Report of the Criteria and Indicators of Sustainable Forest Management, GDF. Ankara. Sürdürülebilir Orman Yönetimi Kriter ve Göstergeleri 2008 Yılı Raporu, Ankara, 2008. Available at: www.ogm.gov.tr/ekutuphane/surdurulebilirOrmanYonetimi/Raporlar/ogmraporu.pdf</p> <p>Nimet Velioğlu, Journal of Faculty of Forestry, Istanbul University, 2008, Volume: 58, Issue 2, pp: 52-79. Orman sınırları dışına çıkarma işleminin tanımı ve tarihsel gelişimi (Historical development and the definition of the practices of taking lands out of forest boundary)</p>	-	<p>Assessment based on legality</p> <p>Content of law</p> <p>At the constitutional level, article 169 of the Turkish Constitution of 1982 has some provisions mentioning forest management and protection. The article reads as follows:</p> <p>“A. Protection and development of forests ARTICLE 169 – The State shall enact the necessary legislation and take the measures required for the protection and extension of forests. Burnt forest areas shall be reforested; other agricultural and stockbreeding activities shall not be allowed in such areas. All forests shall be under the care and supervision of the State.</p> <p>The ownership of state forests shall not be transferred. State forests shall be managed and exploited by the State in accordance with the law. Ownership of these forests shall not be acquired by prescription, nor shall servitude other than that in the public interest be imposed in respect of such forests.</p> <p>Acts and actions that might damage forests shall not be permitted. No political propaganda that might lead to the destruction of forests shall be made; no amnesties or pardons specifically for offences against forests shall be granted. Offences committed with the intention of burning or destroying forests or reducing forest areas shall not be included within the scope of amnesties or pardons.</p> <p>The reduction of forest areas shall be prohibited, except in respect of areas whose preservation as forests is considered scientifically and technically useless but conversion into agricultural land has been found to be definitely advantageous, and in respect of fields, vineyards, orchards, olive groves or similar areas which technically and scientifically ceased to be forest before December 31, 1981 and</p>

<p>The 2-b Lands: from past to present, http://www.bursadefterdarligi.gov.tr/Detay/278/GEcMIsTEN-GuNuMuZE-2-B-ARAZILERI</p> <p>The Ministry of Finance, 2012, 2-B Application Guideline (2-B Başvuru Klavuzu), Ankara, http://www.bursadefterdarligi.gov.tr/galeri/dokumanlar/03052012131600PS978K.pdf</p> <p>The Ministry of Forestry and Water Affairs (2013). Action Plan of Combating Erosion 2013-2017. Republic of Turkey, Ankara. Available at: http://extwprlegs1.fao.org/docs/pdf/tur164392.pdf</p> <p>Weise, Z. 2015. <i>Wild boars arrive in Istanbul due to loss of habitat</i>. The Guardian. https://www.theguardian.com/environment/2015/mar/06/wild-boars-arrive-in-istanbul-due-to-loss-of-habitat</p> <p>Gürtler, K. 2016. <i>Trees versus Concrete: Deforestation in the North Bosphorus Region and Civil Society Responses</i>. Heinrich-Böll-Stiftung. https://tr.boell.org/de/2016/04/15/trees-versus-concrete-deforestation-north-bosphorus-region-and-civil-society-responses</p> <p>Bridger, R. 2015. <i>Campaigners resist destruction of Istanbul forests and wetlands for airport megaproject</i>. Ecologist. http://www.theecologist.org/News/news_analysis/2960616/campaigners_resist_destruction_of_istanbul_forests_and_wetlands_for_airport_megaproject.html</p> <p>Terzi, M. 2015. <i>Deforestation in Turkey</i>. Globe. http://globetamk.weebly.com/blog/deforestation-in-turkey</p> <p>Ocak, S. 2014. <i>Turkey's ordeal with trees: Top 10 mass deforestation sites</i>. http://www.hurriyetdailynews.com/turkeys-ordeal-with-trees-top-10-mass-deforestation-sites.aspx?pageID=238&nID=75114&NewsCatID=340</p>	<p>whose use for agricultural or stockbreeding purposes has been found advantageous, and in respect of built-up areas in the vicinity of cities, towns or villages.” (Turkish Constitution, 1982)</p> <p>It is prohibited by law to transfer the ownership of State forests by any means, either by selling or prescription, etc. However, for conversion of natural forests to other usage, paragraph 4 of the above article is provisioned as an exemption, as forest areas deemed in bad condition, may be taken out of forest boundaries and allocated to other usages, such as agriculture, settlement areas, etc. To implement the above article amendment 1983, No: 2896; and amendment of 1986, No: 3302 have been enacted and since 1984 around 273.000 ha of forestlands have been taken out of forest boundary.</p> <p>The forest lands taken out of State forest boundary became the land of State Treasury. However, the occupants (the public) became the user of those lands without any valid title deed. To transfer the ownerships of those former forest lands to the people, the occupiers, the Parliament has put a new law into practice. In the year 2012 the Law on Selling article 2 and 2b No: 6292 was enacted. The law extended the scope of implementation of articles 2 and 2b of the Forest Code by stating that areas whose preservation as forests is considered scientifically and technically useless but conversion into agricultural land, such as farmland, vineyard, orchard, barnyard, olive farming, hazelnut farming, pistachio farming, nut of stone pine, and pasture has been found to be advantageous, and areas next to cities, towns and village settlements are to be taken out of forest boundary This can occur in the areas of military bases inside the forests, mining areas inside the forests and protection forests. However, there are no official data on those areas being taken out of forest boundaries.</p> <p>Article 16 of Forest Code allows issuing mining license within forest boundaries, along with mining law. More than 10.000 ha of natural forests per year had been opened for mining activities with mining licenses until 2008 (GDF, 2008, pp.57).</p> <p>Article 17 of Forest Code allows issuing license for infrastructure, roads, energy plants, etc. As an average, about 15.000 ha of natural</p>
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	<p>FAO (2015) Global Forest Resources Assessment 2015 – Desk reference. Rome. Available at: http://www.fao.org/3/a-i4808e.pdf (last accessed on 4 January 2018)</p> <p>FAO (2014): Global Forest Resources Assessment 2015 – Country Report, Turkey. Rome. Available at: http://www.fao.org/3/a-i4808e.pdf (last accessed on 4 January 2018)</p>	<p>forests have been opened for those purposes by issuing license for the investors annually (GDF, 2008, pp.57).</p> <p>Article 52 allows housing construction in private forests, by issuing a construction permit to the investor.</p> <p>Article 115 of the Forest Code allows issuing and recording usage rights and easements in natural forests for constructing tourism resorts, sport facilities such as golf etc. Particularly in Southern Turkey, Antalya, Bodrum, Marmaris and all other shoreline throughout the country, almost all hotels, resorts etc. have been issued a license for investment regarding article 115 of the Forest Code for about 50 years, which may be extended till 100 years. GDF or the Ministry of Forest and Water Affairs issues the license to the person or legal entity. The license holder shall pay a compensation to GDF. The payment is calculated on the number of square meters of forest land (Forest Code, art. 17 and 115).</p> <p>Is the law enforced?</p> <p>There are examples of people having occupied State forest lands without the consent of the GDF, and the GDF could not enforce the Forest Code to protect the forests. Because GDF was not able to enforce the Forest Code, the forest lands were converted into other usage. The GDF, as well as the Government, has removed those occupied forest lands of forest boundary and given them to the State Treasury. The State Treasury has then been selling those former forest lands to its occupiers based on the law enacted in 2012, No: 6292. This is not a systematic approach taken to all conversion detected in Turkey (Personal communication 17)</p> <p>Numerous reports have been made about the clearance of forest land for various projects, from the construction of bridges and airports, to new residential areas due to urban sprawl of cities, and mining projects.</p> <p>It may be assumed that such projects are made within the confines of the law, including payment into the reforestation fund. However, it is not known if this is the case, and if the reforestation fund is</p>
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		<p>administered such that it contributes to required areas being re/afforested.</p> <p>Is it possible to conclude that the spatial threshold (0.02% or 5000 ha) can be met by assessing the enforcement of legislation?</p> <p>No it is not possible to conclude that the legislation can prohibit conversion to the outcome of the indicator.</p> <p>Legislation allows conversion through the issuance of investment licenses, such as tourism investment, mining activities etc. but compensation measures (e.g. afforestation cost etc.) ensuring that the spatial thresholds are not exceeded are required. However, the scale of these projects (amount of land deforested) is not known, and it is not known if the law is enforced, or if it would be sufficient to limit net conversion to within the limits set by the indicator if it were enforced.</p> <p>Assessment based on spatial data</p> <p>Is it possible to conclude that the spatial threshold (0.02% or 5000 ha) is met?</p> <p>According to the Global Forest Resources Assessment 2015 for Turkey prepared by FAO, the forest area in Turkey increased by 512,000 ha between the years 2010 and 2015 (from 11,203,000 ha to 11,715,000 ha), with an annual change rate of 102,400 ha/year. There is no clear data available about how much natural forest was converted to plantations or non-forest uses, but the naturally regenerated forest area decreased by 66,000 ha between 2010 and 2015 (from 7,482,000 ha to 7,416,000 ha), and the primary forest increased by 6,400 ha (from 881,000 ha to 913,000 ha), which represents a total decrease of 59,600 ha in natural forest between 2010 and 2015. Furthermore, planted forest increased from 2,840,000 ha to 3,386,000 ha (546,000 ha) between 2010 and 2015, from which an increase of 78,044 ha belongs to erosion control planted forests (from 174,269 ha in 2010 to 252,313 ha in 2015), and an increase of 252,572 ha belongs to rehabilitation planted forests</p>
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		<p>(from 450,099 ha in 2010 to 702,671 ha in 2015). These two types of planted forests make a total increase of 330,616 ha.</p> <p>According to FAO (2014), the high increase in planted forest data for 2010 is due to implementation of the Afforestation and Erosion Control Mobilization Action Plan (2008–2012) and for 2015 is due to Combating Erosion Action Plan (2013-2017). This Action Plan was developed by the Ministry of Forestry and Water Affairs, and aimed to implement activities of afforestation, erosion control and rehabilitation of degraded forest lands and rangelands in the country. Among the applied methods are mentioned: use of appropriate species, terracing, plantations as wall, living fences, forest belts, windbreaks, and others (The Ministry of Forestry and Water Affairs, 2013).</p> <p>Based on the spatial data provided above, conversion of natural forests to plantations or non-forest use in the area under assessment is below the threshold of 0.02% or 5000 hectares average net annual loss.</p> <p>Risk designation: Low risk. Thresholds (1) and (3) are met: (1) Thresholds provided in the indicator are not exceeded. AND (3) Other available evidence does not challenge a 'low risk' designation.</p>
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Recommended control measures

N/A

Controlled wood category 5: Wood from forests in which genetically modified trees are planted

Risk assessment

Indicator	Sources of information	Functional scale	Risk designation and determination
5.1	<p>Law on Biosecurity of 2010, No: 5977, http://www.tbdbm.gov.tr/home/regulationshome/nationalregulationsdetails/Biyog%C3%BCvenlik_Kanunu.aspx</p> <p>Birler. A.S. 1994. A study of yields from “i214” poplar plantations. http://kavakcilik.ogm.gov.tr/Yayinlar/Muhtelif%20Yay%C4%B1nlar/A%20Study%20of%20Yields%20From%20I-214%20Poplar%20Plantations.pdf</p> <p>Environmental Justice Atlas. 2017. <i>Genetically Modified Organisms in Turkey</i>. https://ejatlas.org/conflict/genetically-modified-organisms-in-turkey</p> <p>International Service for the Acquisition of Agri-biotech Applications (ISAAA). 2017. <i>GM Approval Database</i>. http://www.isaaa.org/gmapprovaldatabase/approvedeventsin/default.asp?CountryID=TR&Country=Turkey</p> <p>Burcu ÇENGEL, Yasemin TAYANÇ, Gaye KANDEMİR, Ercan VELİOĞLU, Applications of Biotechnology in Forestry. Orman Genel Müdürlüğü – Orman Ağaçları ve Tohumları Islah Araştırma Enstitüsü Müdürlüğü (The Directorate of the research Institute of forest trees and seeds) (OATIAEM) ANKARA,</p> <p>Özeren, Z.O. and Teselli, A.Ö. 2016. <i>Agricultural law in Turkey: overview</i>. Thomson Reuters. https://content.next.westlaw.com/Document/lffb80b18ddf311e498db8b09b4f043e0/View/FullText.html?contextData=(sc.Default)&transitionType=Default&firstPage=true&bhcp=1</p> <p>Expert consultation Personal communication 2 – Researcher, Poplar and Fast Growing Trees Research Institute Personal communication 3 – Director, Istanbul Regional Forestry District</p>	-	<p>Low risk</p> <p>The following thresholds are met: (2) There is no commercial use of GM tree species in the area under assessment, AND (3) Other available evidence does not challenge ‘low risk’ designation.</p> <p>GMO can be allowed under the Law on Biosecurity. A Permit is required for the use of GMO plants, animals etc. for research, trade, import, export, etc. purposes. The applicant shall require a permit from a special control board. Currently, there are no permits issued for commercial timber, and no indication of illegal use of GMO trees.</p>

GMO Context Question	Answer	Sources of Information (list sources if different types of information, such as reports, laws, regulations, articles, web pages news articles etc.).
1 Is there any legislation covering GMO (trees)?	Yes. The Law on Biosecurity does not provide specific regulations for trees, but trees are treated with all other organisms. The BiosafetyBiosecurity Law permits the regulated study and development of plant biotechnology, but bans the production of GM animals and plants commercially. The import of transgenic agricultural products is only allowed after approval of each import. Importation of seeds containing GMO is forbidden by the BiosafetyBiosecurity Law and by the seed import circular, which is usually published each January by the Ministry of Food, Agriculture and Livestock (MFAL).	Law on Biosecurity of 2010, No: 5977 http://www.tbbdm.gov.tr/home/regulationshome/nationalregulationsdetails/Biyog%C3%BCvenlik_Kanunu.aspx
2 Does applicable legislation for the area under assessment include a ban for commercial use of GMO (trees)?	No. The importation, exportation, experimental release into the environment, placing on the market of GMOs and products thereof and contained use of genetically modified microorganisms are permitted in accordance with the results of scientific risk assessments. Decisions issued for applications determined as not posing risk are valid for ten years. However, production, except for controlled research and development (R&D) activity and importing and export is allowed under certain conditions, is banned.	Law on Biosecurity of 2010, No: 5977. Article 3 http://www.tbbdm.gov.tr/home/regulationshome/nationalregulationsdetails/Biyog%C3%BCvenlik_Kanunu.aspx Özeren, Z.O. and Teselli, A.Ö. 2016. <i>Agricultural law in Turkey: overview</i> . Thomson Reuters. https://content.next.westlaw.com/Document/Iffb80b18ddf311e498db8b09b4f043e0/View/FullText.html?contextData=(sc.Default)&transitionType=Default&firstPage=true&bhcp=1
3 Is there evidence of unauthorized use of GM trees?	There is no indication of unauthorized use of GMO in Turkey.	The Institute of Poplar and Fast Growing Species Research institute located in Izmit. (Source: personal communication 2 – Researcher, Poplar and Fast Growing Trees Research Institute)

4	Is there any commercial use of GM trees in the country or region?	No. Permits have only been granted for the import of GM soy and maize, specifically for the use of animal feed. Poplar is the only tree species for which commercial approvals are listed on the ISAAA database, and China is the only country where they have been made.	The Institute of Poplar and Fast Growing Species Research institute located in Izmit. (Source: personal communication 2 – Researcher, Poplar and Fast Growing Trees Research Institute) International Service for the Acquisition of Agri-biotech Applications (ISAAA), 2017. <i>GM Approval Database</i> . http://www.isaaa.org/gmapprovaldatabase/approvedeventsin/default.asp?CountryID=TR&Country=Turkey
5	Are there any trials of GM trees in the country or region?	No. There have been scientific field tests carried out by the Institute of Poplar and Fast Growing Species Research institute, dating back to the 1990s. The tests used Poplar trees (<i>Populus canadensis</i> , I-214 Clone), however this clone was not created with genetic engineering and is not considered GMO.	Personal communication 2 - Researcher, Poplar and Fast Growing Trees Research Institute, Izmit Birler, 1994. A study of yields from “i214” poplar plantations. http://kavakcilik.ogm.gov.tr/Yayinlar/Muhtelif%20Yay%C4%B1nlar/A%20Study%20of%20Yields%20From%20I-214%20Poplar%20Plantations.pdf
6	Are licenses required for commercial use of GM trees?	Yes. A permit is required for use of GMO plants, animals etc. for research, trade, import, export, etc. - The applicant shall require a permit from a special control board mentioned in the law. The permit will be valid for 10 years.	Law on Biosecurity of 2010, No: 5977, Article 3 http://www.tbbdm.gov.tr/home/regulationshome/nationalregulationsdetails/Biyog%C3%BCvenlik_Kanunu.aspx
7	Are there any licenses issued for GM trees relevant for the area under assessment ? (If so, in what regions, for what species and to which entities?)	No permits are issued for commercial timber trees use in Turkey. Permits for grown GM organisms have only been granted for the import of maize and soy for animal feed, and not for the commercial cultivation of any crops. 21 GMO corn varieties, 3 colza, 1 sugar beet and 1 potato varieties to be used as human food; 3 colza, 1 sugar beet varieties to be used as animal feed and 22 corn varieties to be used as bioethanol are awaiting approval of the Biosafety Commission. By asserting the serious and irreversible damage risks of	Environmental Justice Atlas, 2017. <i>Genetically Modified Organisms in Turkey</i> . https://ejatlas.org/conflict/genetically-modified-organisms-in-turkey International Service for the Acquisition of Agri-biotech Applications (ISAAA), 2017. <i>GM Approval Database</i> . http://www.isaaa.org/gmapprovaldatabase/approvedeventsin/default.asp?CountryID=TR&Country=Turkey Personal communication 2 – Researcher, Poplar and Fast Growing Trees Research Institute Personal Communication 3 – Director, Istanbul Regional Forestry District

		<p>GMOs to human, animal and environmental health and the lack of data regarding their potential risks when used as animal feed, NGOs defend the ban of their importation based on the precautionary principle. Social movements and organisations have launched national campaigns which prevented for now the use of GMOs in agriculture.</p> <p>Poplar is the only tree species for which commercial approvals are listed on the ISAAA database, and China is the only country where they have been made.</p>	
8	What GM 'species' are used?	N/A	<p>Personal communication 2 – Researcher, Poplar and Fast Growing Trees Research Institute</p> <p>Personal Communication 3 – Director, Istanbul Regional Forestry District</p>
9	Can it be clearly determined in which MUs the GM trees are used?	N/A	N/A

Recommended control measures

N/A

Annexes

Appendix 1. List of rare, threatened, endemic or nationally important forest species (Özüt et al. in print)

No	Scientific Name	Endemicity	IUCN National Threat Category
Woody Plants			
1	<i>Abies nordmanniana</i> subsp. <i>equi-trojani</i>	Endemic	NT
2	<i>Acer divergens</i>	Endemic	VU
3	<i>Acer hyrcanum</i> subsp. <i>reginae-amaliae</i>	Endemic	EN
4	<i>Alnus glutinosa</i> subsp. <i>antitaurica</i>	Endemic	NT
5	<i>Alnus glutinosa</i> subsp. <i>betuloides</i>	Endemic	NT
6	<i>Amygdalus kotschyi</i>	Regionally Endemic	VU
7	<i>Betula browicziana</i>	Endemic	VU
8	<i>Cerasus erzincanica</i>	Endemic	CR
9	<i>Colutea melanocalyx</i> subsp. <i>melanocalyx</i>	Endemic	EN
10	<i>Cytisus gueneri</i>	Endemic	CR
11	<i>Epigaea gaultherioides</i>	Regionally Endemic	VU
12	<i>Euonymus latifolius</i> subsp. <i>cauconis</i>	Endemic	EN
13	<i>Flueggea anatolica</i>	Endemic	CR
14	<i>Fraxinus excelsior</i> subsp. <i>coriariifolia</i>	Regionally Endemic	VU
15	<i>Fraxinus pallisae</i>	Regionally Endemic	VU
16	<i>Genista sandrasica</i>	Endemic	EN
17	<i>Gonocytisus dirmilensis</i>	Endemic	EN
18	<i>Juniperus oxycedrus</i> subsp. <i>macrocarpa</i>	Regionally Endemic	VU
19	<i>Liquidambar orientalis</i>	Endemic	VU
20	<i>Lonicera nummulariifolia</i> subsp. <i>glandulifera</i>	Endemic	NT
21	<i>Osmanthus decorus</i>	Regionally Endemic	VU
22	<i>Pinus halepensis</i>	Regionally Endemic	VU
23	<i>Pyrus anatolica</i>	Endemic	EN
24	<i>Pyrus serikensis</i>	Endemic	EN
25	<i>Pyrus yaltirikii</i>	Endemic	EN
26	<i>Quercus pontica</i>	Regionally Endemic	VU
27	<i>Quercus vulcanica</i>	Endemic	NT
28	<i>Rhododendron ungerii</i>	Regionally Endemic	VU
29	<i>Rosa arvensis</i>	Regionally Endemic	VU
30	<i>Sageretia spinosa</i>	Regionally Endemic	VU
31	<i>Salix caucasica</i>	Regionally Endemic	VU
32	<i>Zelkova carpiniifolia</i>	Regionally Endemic	VU
Herbaceous Plants			
33	<i>Acantholimon birandii</i>	Endemic	CR
34	<i>Acantholimon koeycegizicum</i>	Endemic	CR
35	<i>Alkanna dumanii</i>	Endemic	CR
36	<i>Allium elmaliense</i>	Endemic	CR
37	<i>Anchusa limbata</i>	Endemic	CR
38	<i>Anthemis adonidifolia</i>	Endemic	CR
39	<i>Anthemis macrotis</i>	Endemic	EN

No	Scientific Name	Endemicity	IUCN National Threat Category
40	<i>Asparagus lycicus</i>	Endemic	CR
41	<i>Astragalus albertshoferi</i>	Endemic	CR
42	<i>Astragalus altanii</i>	Endemic	CR
43	<i>Astragalus bozakmanii</i>	Endemic	CR
44	<i>Astragalus spitzenbergeri</i>	Endemic	CR
45	<i>Centaurea antalyensis</i>	Endemic	CR
46	<i>Centaurea ptosimopappoides</i>	Endemic	CR
47	<i>Chaerophyllum aksekiense</i>	Endemic	CR
48	<i>Crocus abantensis</i>	Endemic	CR
49	<i>Crocus adanensis</i>	Endemic	CR
50	<i>Cyclamen mirabile</i>	Endemic	EN
51	<i>Ferula amanicola</i>	Endemic	CR
52	<i>Ferula coskunii</i>	Endemic	CR
53	<i>Ferulago isaurica</i>	Endemic	CR
54	<i>Fritillaria forbesii</i>	Endemic	EN
55	<i>Fritillaria kittaniae</i>	Endemic	EN
56	<i>Galanthus cilicicus</i>	Endemic	EN
57	<i>Galanthus koenenianus</i>	Endemic	EN
58	<i>Glycyrrhiza flavescens subsp. antalyensis</i>	Endemic	CR
59	<i>Gypsophila pilulifera</i>	Endemic	CR
60	<i>Muscari macbeathianum</i>	Endemic	EN
61	<i>Nepeta conferta</i>	Endemic	CR
62	<i>Ophrys amanensis subsp. iceliensis</i>	Endemic	CR
63	<i>Ophrys isaura</i>	Endemic	EN
64	<i>Ophrys lyciense</i>	Endemic	CR
65	<i>Ornithogalum microcarpum</i>	Endemic	CR
66	<i>Prangos turcica</i>	Endemic	CR
67	<i>Rindera dumanii</i>	Endemic	CR
68	<i>Rubia davisiana</i>	Endemic	CR
69	<i>Salvia nydeggeri</i>	Endemic	EN
70	<i>Salvia sericeotomentosa</i>	Endemic	EN
71	<i>Satureja amani</i>	Endemic	CR
72	<i>Scilla sardensis</i>	Endemic	CR
73	<i>Silene koycegizensis</i>	Endemic	CR
74	<i>Symphytum asperum</i>	Endemic	CR
75	<i>Thymus cariensis</i>	Endemic	CR
76	<i>Thymus pulvinatus</i>	Endemic	CR
77	<i>Trigonella cassia</i>	Endemic	CR
78	<i>Verbascum adenocaulon</i>	Endemic	CR
79	<i>Verbascum freynii</i>	Endemic	CR
80	<i>Verbascum prusianum</i>	Endemic	CR
	Large Mammals		
81	<i>Canis lupus</i>	Not Endemic	LC
82	<i>Capreolus capreolus</i>	Not Endemic	NT
83	<i>Cervus elaphus</i>	Not Endemic	NT

No	Scientific Name	Endemicity	IUCN National Threat Category
84	<i>Dama dama</i>	Not Endemic	CR
85	<i>Ursus arctos</i>	Not Endemic	LC
	Small Mammals		
86	<i>Acomys cilicicus</i>	Endemic	EN
87	<i>Chionomys roberti</i>	Regionally Endemic	LC
88	<i>Microtus majori</i>	Regionally Endemic	LC
89	<i>Sciurus anomalus</i>	Regionally Endemic	LC
90	<i>Talpa caucasica</i>	Regionally Endemic	LC
91	<i>Talpa levantis</i>	Regionally Endemic	LC
	Birds		
92	<i>Accipiter gentilis</i>	Not Endemic	NT
93	<i>Aegypius monachus</i>	Not Endemic	EN
94	<i>Aquila heliaca</i>	Not Endemic	EN
95	<i>Dendrocopos leucotos</i>	Not Endemic	VU
96	<i>Dendrocopos major</i>	Not Endemic	LC
97	<i>Dryocopus martius</i>	Not Endemic	NT
98	<i>Haliaeetus albicilla</i>	Not Endemic	CR
	Reptiles and Amphibians		
99	<i>Lyciasalamandra antalyana</i>	Endemic	EN
100	<i>Lyciasalamandra atifi</i>	Endemic	EN
101	<i>Lyciasalamandra billae</i>	Endemic	CR
102	<i>Lyciasalamandra fazilae</i>	Endemic	EN
103	<i>Lyciasalamandra flavimembris</i>	Endemic	EN
104	<i>Lyciasalamandra luschani</i>	Endemic	VU
105	<i>Mertensiella caucasica</i>	Regionally Endemic	VU
106	<i>Montivipera albizona</i>	Endemic	EN
107	<i>Vipera kaznakovi</i>	Regionally Endemic	EN
108	<i>Vipera pontica</i>	Regionally Endemic	EN
	Butterflies		
109	<i>Boloria euphrosyne</i>	Not Endemic	LC
110	<i>Lycaena ottomana</i>	Not Endemic	VU
111	<i>Melanargia wiskotti</i>	Endemic	VU
112	<i>Thecla betulae</i>	Not Endemic	LC
113	<i>Zerynthia caucasica</i>	Not Endemic	NT
114	<i>Zerynthia polyxena</i>	Not Endemic	LC

Appendix 2. Distribution of rare, threatened, endemic or nationally important forest species to Regional Forest Directorates and Forest Management Directorates (numbers in the cells correspond to a target species' number given in Appendix 1) (Özüt et al., in print)

Regional Forest Directorate	Forest Management Directorate	Woody Plants	Non-Woody Plants	Large Mammals	Small Mammals	Birds	Reptiles and Amphibians	Butterflies
ADANA	ADANA	22	38,71		89	92		111
	FEKE			81	89	92,94,97,95,96		
	KADIRLI			82,81,85	89	92,95,96	106	
	KARAIISALI			81	89	92,93,97,95,96		
	KOZAN	4,13,22		81	89	92,97,95,96		
	OSMANIYE	4,29	49,51,66	82,81,85	89	92,96		
	POS		46	81	89	92,94,97,95,96		
	POZANTI		38,46	81	89	92,93,94,97,95,96		
	SAIMBEYLI		60	81,85	89	92,95,96	106	
AMASYA	ALMUS			83,82,81,85	89	94		
	AMASYA			83,82,81,85	88,89,91	92,93,94,95,96		
	BAFRA	15		83,82,81	89,91	92,93,95,96		
	CORUM			83,82,81,85	89	92,93,94,95,96		
	ERBAA			83,82,81,85	88,89,91	92,94,97,95,96		
	ISKILIP			82,81	89	92,93,94,96		
	KARGI			83,82,81,85	89	92,93,94,97,95,96		
	NIKSAR			83,82,81,85	87,88,89,91	92,94,97,95,96	105	
	SAMSUN	15		82,81,85	87,88,89,91	92,93,94,95,96		
	TOKAT			83,81,85	89	93,94		
	VEZIRKOPRU			83,82,81,85	88,89,91	92,93,94,97,95,96		
ANKARA	ANKARA			83,81,85	89	92,93,94,96		
	BEYPAZARI			83,81,85	89	92,93,94,97,98,96		
	CAMLIDERE			83,81,85	89	92,93,94,97,96		109
	CANKIRI			83,82,81,85	89	92,93,94,97,96		
	CERKES			83,81,85	89	92,93,94,97,96		
	ESKIPAZAR			83,82,81,85	89,91	92,93,94,97,95,96		

Regional Forest Directorate	Forest Management Directorate	Woody Plants	Non-Woody Plants	Large Mammals	Small Mammals	Birds	Reptiles and Amphibians	Butterflies
	ILGAZ		79	83,82,81,85	89	92,93,94,97,96		109
	KIRIKKALE		59	81	89	93,94		
	KIRSEHIR			81		93,94		
	KIZILCAHAMAM		43	83,81,85	89	92,93,94,97,96		109
	NALLIHAN			83,82,81,85	89	92,93,94,97,98,96		
ANTALYA	AKSEKI		45,47	83,81,85	89	92,97,95,96	100	
	ALANYA		53,59	81,85	89	92,95,96	100	110
	ANTALYA	9,20,24,30	37,58,64	84,81	89	92,94,95,96	99,101	
	ELMALI		36,40,44,61,68	81	89	92,94,96		
	FINIKE	30			89	92,94,95,96	104	
	GAZIPASA			81,85	89	92,95,96	100	110
	GUNDU			81,85	89	92,95,96		110
	KAS	19,2	55		89	92,94,95,96	104	
	KORKUTELI		41	84,81	89	92,94,96	99	
	KUMLUCA	20	64	81	89	92,94,95,96	101	
	MANAVGAT			81,85	89	92,95		110
	SERIK	19,24		81,85	89	92,95,96		
	TASAGIL			81,85	89	92,95,96		110
ARTVIN	ARDANUC	2		82,81,85	87,88,89,91	92,93,94,97,96	105,108	109
	ARHAVI			82,81,85	87,88,89,90,91	92,93,97,95,96	105,107,108	
	ARTVIN	2,7,21,26,28,31		82,81,85	87,88,89,91	92,93,94,97,95,96	105,108	109
	BORCKA	2,7,11,21,26,28,31		82,81,85	87,88,89,90,91	92,93,97,95,96	105,107,108	109
	SAVSAT	12		82,81,85	87,88,89,91	92,93,94,97,96	105	109
	YUSUFELI	2		82,81,85	87,88,89,91	92,93,94,97,95,96	105	109,112
BALIKESIR	ALACAM			83,81,85	89	92,94,96		
	BALIKESIR	1		82,81,85	89,91	92,94,97,96		
	BANDIRMA	1	76	82,81,85	89,91	94,97,95,96		
	BIGADIC			83,81,85	89	92,94,96		

Regional Forest Directorate	Forest Management Directorate	Woody Plants	Non-Woody Plants	Large Mammals	Small Mammals	Birds	Reptiles and Amphibians	Butterflies
	DURSUNBEY			83,82,81,85	89	92,93,94,96		
	EDREMIT	1	76	82,81,85	89,91	92		
	SINDIRGI			83,81,85	89	92,94,96		114
BOLU	AKCAKOCA			82,85	89,91	92,97,95		
	ALADAG			83,82,81,85	89,91	92,93,94,97,96		
	BOLU	12	48	83,82,81,85	89,91	92,93,94,97,95,96		109,113,114
	DUZCE			83,82,81,85	89,91	92,94,97,95,96		113,114
	GEREDE			83,82,81,85	89,91	92,93,94,97,95,96		
	GOLYAKA			83,82,81,85	89,91	92,94,97,95,96		
BOLU	GOYNUK			83,82,81,85	89,91	92,93,94,97,96		
	KIBRISCIK			83,81,85	89	92,93,94,97,96		
	MENGEN			83,82,81,85	89,91	92,93,94,97,95,96		113
	MUDURNU		48	83,82,81,85	89,91	92,93,94,97,96		109,113,114
	SEBEN			83,82,81,85	89	92,93,94,97,96		
	YIGILCA			83,82,81,85	89,91	92,94,97,95,96		
BURSA	BILECIK			83,82,81,85	89,91	92,93,94,97,95,96		
	BURSA		80	83,82,81,85	89,91	92,93,94,97,95,96		109,114
	INEGOL			83,82,81,85	89,91	92,93,94,97,95,96		
	KELES			83,82,81,85	89,91	92,93,94,97,95,96		
	MUSTFAKEMALPASA			83,82,81,85	89,91	92,93,94,97,95,96		
	ORHANELI			83,82,81,85	89,91	92,93,94,97,96		
	YALOVA				89,91	97,95		
ÇANAKKALE	KESAN			81		98		114
	YENICE	1		81,82,85	89,91	92		
	KALKIM	1		82,81,85	89,91	92		
	CANAKKALE			81	89,91	98		
	CAN	1		82,81,85	89,91	92		

Regional Forest Directorate	Forest Management Directorate	Woody Plants	Non-Woody Plants	Large Mammals	Small Mammals	Birds	Reptiles and Amphibians	Butterflies
	BIGA			81	89,91			
	BAYRAMIC	1		82,81,85	89,91	92		
	AYVACIK			85	89,91	92		
DENIZLI	ACIPAYAM	20		81,85	89	92,98,95,96		
	CAL			83,81	89	92,93,98,96		
	CAMELI			81,85	89	92,98,95,96	102	
	DENIZLI			81	89	92,93,96		
	ESKERE			81,85	89	92,98,95,96		
	TAVAS			81,85	89	92,98,96		
	USAK	23		83,81,85	89	92,93,96		
ELAZIG	BINGOL	5,25		81,85	89	93,94		
	BITLIS	5		81,85	89			
	ELAZIG			81,85	89	93,94		
	HAKKARLI	6,32		81,85	89			109
ELAZIG	MALATYA		42	83,81,85	89			
	MUS	32		81,85		93		
	TUNCELI	4		81,85	89	93,96		
	VAN			81,85	89	93,94		109
ERZURUM	AGRI			81,85		93,94		
	ARDAHAN	26,31,32		82,81,85	87,88,89,91	92,93,94,98,96	105	109
	ERZINCAN	8		83,81,85	89	92,93,94,98,96		
	ERZURUM	2,5,11		82,81,85	87,88,89,91	92,93,94,96	105	109
	IGDIR	14		81,85		93,94		109
	KARS		74	81,85	89,91	93,98		
	OLTU	2		82,81,85	88,89,91	92,93,94,96	105	
	SARIKAMIS			81,85	89,91	93,94		109
	SENKAYA			82,81,85	89,91	93,94		112
ESKISEHIR	AFYONKARAHISAR	27		83,81,85	89	92,93,94,98,96		

Regional Forest Directorate	Forest Management Directorate	Woody Plants	Non-Woody Plants	Large Mammals	Small Mammals	Birds	Reptiles and Amphibians	Butterflies
	CATACIK			83,81,85	89	92,93,94,97,98,96		
	ESKISEHIR			83,82,81,85	89	92,93,94,97,96		109,114
	MIHALICIK			83,81,85	89	92,93,97,98,96		
GIRESU N	AKKUS			82,85	87,88,89,91	92,97,95,96	105	
	DERELI			82,81,85	87,88,89,91	92,94,97,95,96	105	113
	ESPIYE	21		82,81,85	87,88,89,91	92,94,97,95,96	105	
	GIRESU N	21		82,81,85	87,88,89,91	92,94,97,95,96	105	
	KOYULHISAR			82,81,85	87,88,89	92,93,94,97,98,96	105	
	MESUDIYE			82,81,85	87,88,89,91	92,94,97,95,96	105	109,113
	ORDU			82,81,85	87,88,89,91	92,94,97,95,96	105	109
	SEBINKARAHISAR			82,81,85	87,88,89,91	92,93,94,97,96	105	
	TIREBOLU	21		82,81,85	87,88,89,91	92,94,97,95,96	105	
	UNYE			82,81,85	87,88,89,91	92,94,97,95,96	105	109
ISPARTA	BUCAK	19		81,85	89	92,95,96		
	BURDUR			81,85	89	92,93,95,96		
	DINAR			81	89	92,93,98,96		
	EGIRDİR	9,27	50	81,85	89	92,95,96		
	GOLHISAR	3,17,20		81,85	89	92,95,96		
ISPARTA	ISPARTA	19	50	81	89	92,95,96		
	SUTCULER	9		81,85	89	92,95,96		
ISTANBU L	BAHCEKOY			82	91	96		
	CATALCA	15		83,81	91	92,97,98,95,96		
	DEMIRKOY			83,82,81	91	92,94,97,98,95,96		112
	EDİRNE			81		92,98,95		
	ISTANBU L			82	89,91	96		114
	KANLICA			82	89,91			114
	KIRKLAR ELI			83,82,81	91	92,94,97,98,95,96		

Regional Forest Directorate	Forest Management Directorate	Woody Plants	Non-Woody Plants	Large Mammals	Small Mammals	Birds	Reptiles and Amphibians	Butterflies
	SILE			82	89,91			
	TEKIRDAG			83,81	91	92,97,98,95,96		
	VIZE			83,82,81	91	92,94,97,98,95,96		
IZMIR	AKHISAR			81	89	92,96		
	BAYINDIR			83,82	89	92,98		
	BERGAMA	1			89	92		
	DEMIRCI			81,85	89	92,93,94,96		
	GORDES			81,85	89	92,94,96		
	IZMIR		72	83,82	89			
	MANISA			83,82	89	93		
	MENDERES	18		83,82	89	92,98		
K.MARAS	ANDIRIN	13,22		81,85	89	92,95,96	106	
	ANTAKYA		52,71,77	83,82,81	89	92		111
	DORTYOL		70	82,81,85	89	92		
	GAZIANTEP			83,81	89	96		
	GOKSUN	4		81,85	89	92,96	106	
	K.MARAS			81,85	89	92,96	106	
	KILIS			83,82,81,85	89	96		
KASTAMONU	ARAC			83,82,81,85	89	92,93,94,97,95,96		
	AYANCIK	12		83,82,81,85	89,91	92,97,95,96		
	AZDAVAY			83,82,81,85	89,91	92,97,95,96		
	BOYABAT			83,82,81,85	89,91	92,93,94,97,95,96		
	BOZKURT			83,82,81,85	89,91	92,97,95,96		
KASTAMONU	CATALZEYTIN			83,82,81,85	89,91	92,97,95,96		
	CIDE			83,82,81,85	89,91	92,97,95,96		
	DADAY			83,82,81,85	89,91	92,94,97,95,96		109
	DURAGAN			83,82,81,85	89,91	92,93,94,97,95,96		
	HANONU			83,82,81,85	89,91	92,97,95,96		

Regional Forest Directorate	Forest Management Directorate	Woody Plants	Non-Woody Plants	Large Mammals	Small Mammals	Birds	Reptiles and Amphibians	Butterflies
	IHSANG AZI			83,82,81,85	89	92,93,94,97,95,96		
	INEBOLU			83,82,81,85	89,91	92,97,95,96		
	KARADERE		65	83,82,81,85	89	92,93,94,97,95,96		
	KASTAMONU	31		83,82,81,85	89,91	92,93,94,97,95,96		
	KURE			83,82,81,85	89,91	92,97,95,96		
	PINARBASI			83,82,81,85	89,91	92,97,95,96		
	SAMATLAR			83,82,81,85	89	92,94,97,95,96		
	SINOP			83,82,81,85	89,91	92,93,97,95,96		
	TASKOPRU			83,82,81,85	89,91	92,93,94,97,95,96		
	TOSYA		65,79	83,82,81,85	89	92,93,94,97,96		109
	TURKELI			83,82,81,85	89,91	92,97,95,96		
KAYSERI	AKDAGMADENI			83,81,85		93,94,96		
	KAYSERI		46,49	81,85	89	92,94,97,95,96	106	
	NEVSEHIR			81				
	NIGDE		78	81,85	89	92,93,94,96		
	SIVAS			83,82,81,85	89	92,94,98,96	106	
	YOZGAT			83,81,85		93,94,96	106	
KONYA	AKSARAY			81,85		94,96		
	BEYSEHIR		67	83,81,85	89	92,97,96		
	ERMENEK		35	81,85	89	92,96		
	KARAMAN	27	33	81,85	89	92,96		
	KONYA	27	59	81,85	89	92,93,94,96		
KUTAHYA	DOMANIC			83,82,81,85	89	92,93,94,97,95,96		109,114
	EMET			83,81,85	89	92,93,94,96		
	GEDIZ			83,81,85	89	92,93,96		
	KUTAHYA	27		83,82,81,85	89	92,93,94,96		
	SIMAV			83,81,85	89	92,93,94,96		
KUTAHYA	TAVSANLI			83,82,81,85	89	92,93,94,96		

Regional Forest Directorate	Forest Management Directorate	Woody Plants	Non-Woody Plants	Large Mammals	Small Mammals	Birds	Reptiles and Amphibians	Butterflies
MERSIN	ANAMUR		59	85	89	92,95,96		
	BOZYAZI			85	89	92,96		
	ERDEMLI			81	86,89	92,95,96		111
	GULNAR		63	81,85	89	92,96		111
	MERSIN		56,62	81	89	92,95,96		
	MUT			81,85	89	92,96		
	SILIFKE			81,85	86,89	92,96		111
	TARSUS	13		81	89	92,93,95,96		111
MUGLA	AYDIN	19	50	84,85	89	92,98		
	DALAMAN	19		81,85	89	92,98,95,96	102	
	FETHIYE	3,19	54	81,85	89	92,98,95,96	102,104	110
	KAVAKLIDERE			85	89	92,95,96		
	KEMER		69	81,85	89	92,94,95,96		
	KOYCEGIZ	9,10,16,19	34,73,75	81,85	89	92,98,95,96	102	
	MARMARIS	19	54,73	85	89	98	103	
	MILAS	18,19	39	85	89	92,98		
	MUGLA	22	75	85	89	92,98,95,96	102,103	
	NAZILLI			81,85	89	92,93,96		
	YATAGAN		39,5	85	89	92,96		
	YILANLI			81,85	89	92,98,95,96		
SAKARYA	ADAPAZARI			83,82,85	89,91	97,95		
	AKYAZI			83,82,81,85	89,91	92,94,97,95,96		
	GEYVE			83,82,81,85	89,91	92,93,94,97,96		
	GOLCUK			83,82,85	89,91	97,95		
	HENDEK			83,82,81,85	89,91	92,94,97,95,96		
	IZMIT			83,82	89,91	97,95		
	KARASU			82	89,91	92,97,95		
SANLIURFA	ADIYAMAN		42	81,85				

Regional Forest Directorate	Forest Management Directorate	Woody Plants	Non-Woody Plants	Large Mammals	Small Mammals	Birds	Reptiles and Amphibians	Butterflies
	BATMAN			81,85	89			
	DIYARBAKIR			81,85		94		
	MARDIN			81,85				
SANLIURFA	SANLIURFA			81				111
	SIIRT	6,32		81,85	89			
	SIRNAK			81,85	89			
TRABZON	BAYBURT			82,81,85	89	92,93,94,96	105	
	GUMUSHANE			83,82,81,85	89,91	92,93,94,96	105	109
	MACKA	7,21		83,82,81,85	87,88,89,91	92,93,94,97,95,96	105	109
	PAZAR	7,11,21,26,28,31		82,81,85	87,88,89,90,91	92,93,97,95,96	105	109
	RIZE	26		82,81,85	87,88,89,90,91	92,93,94,97,95,96	105	
	SURMENE	11,26,32	57	82,81,85	87,88,89,91	92,93,94,97,95,96	105	
	TORUL			83,82,81,85	87,88,89,91	92,93,94,97,95,96	105	109
	TRABZON			83,82,81,85	87,88,89,91	92,97,95,96	105	109
ZONGULDAK	BARTIN			83,82,81,85	89,91	92,94,97,95,96		
	DEVREK			83,82,81,85	89,91	92,94,97,95,96		
	DIRGINE			83,82,81,85	89,91	92,94,97,95,96		113
	EREGLI	15		83,82,81,85	89,91	92,94,97,95		
	KARABUK	12		83,82,81,85	89,91	92,93,94,97,95,96		109
	SAFRANBOLU			83,82,81,85	89,91	92,94,97,95,96		109
	ULUS			83,82,81,85	89,91	92,94,97,95,96		
	ZONGULDAK	12,15		83,82,81,85	89,91	92,94,97,95,96		
	YENICE			81,82,83,85	89,91	92,94,97,95,96		

Appendix 3: HCV-4 Areas Designated Routinely by Forest Management Plans

HCV-4: Protection Criteria and Indicators for Forest Tree Species		
Criteria	Indicator	Protection Target
Slope	>%80	Protection for all species
Actual soil depth	< 25 cm	Protection for all species
Physiological soil depth	< 50 cm	Protection for all species
Ratio of stone in soil	>%50	Protection for beech, black pine, scotch pine, oak species, spruce
	>%80	Protection for Turkish pine and cedar
	>%60	Protection for all other species
High altitude forest zone	The upper 100-150 m wide zone of the highest visible forest	Protection for all species

Appendix 4. Key Biodiversity Areas with significant forest areas containing HCV 2 and/or HCV 3 areas

Key Biodiversity Areas with significant forest areas containing HCV 2 and/or HCV 3 areas										
No	Region	Name of the Area	Forest Type	Legal Land Classification	Other Status	HCV 2	HCV 3	Total Area	Forest Area	Threats
1	Black Sea	Uludağ	Production Forest	There is a National Park within the larger forest area	Key Biodiversity Area	Large forest block	-	136.547	100.980	
2	Mediterranean	Kaz Mountains	Production Forest	There is a National Park within the larger forest area	Key Biodiversity Area	Large forest block	Forest of a rare endemic fir subspecies	160.106	139.698	
3	Black Sea	Kocacay	Protected Area	Wildlife Conservation Area	Key Biodiversity Area	Large forest block	Floodplain forest	28.575	21.708	
4	Black Sea	Igneada Longoz Forests	Protected Area	National Park	Key Biodiversity Area	Large forest block	Floodplain forest	3.155	2.563	Possible fragmentation risk due to roads
5	Black Sea	Catalca Cilingoz Forest	Protected Area	Wildlife Conservation Area	Key Biodiversity Area	Large forest block	Floodplain forest	35.699	33.186	
6	Black Sea	Istranca Mountains	Production Forest	-	Key Biodiversity Area	Large forest block	-	195.986	156.752	
7	Black Sea	Kocacay Delta	Production Forest	Wildlife Conservation Area	Key Biodiversity Area	Large forest block	Floodplain forest	6.976	1.246	

Key Biodiversity Areas with significant forest areas containing HCV 2 and/or HCV 3 areas										
No	Region	Name of the Area	Forest Type	Legal Land Classification	Other Status	HCV 2	HCV 3	Total Area	Forest Area	Threats
8	Black Sea	Armutlu Peninsula	Production Forest	-	Key Biodiversity Area	Large forest block	-	80.025	54.736	
9	Black Sea	Ömerli Basin	Production Forest	-	Key Biodiversity Area	Large forest block	Ecosystem mosaic-forest and heathland	58.215	45.055	Misplaced forestation damaging habitats and fragmentation due to roads
10	Black Sea	Sakarya River Delta	Production Forest	-	Key Biodiversity Area	-	Floodplain forest	34.244	9.787	
11	Black Sea	Yedigöller & Yesilöz	Protected Area	Wildlife Conservation Area	Key Biodiversity Area	Large forest block	Old growth forests	49.870	47.501	Old growth forests may be subject to timber production
12	Black Sea	Köroğlu Mountains	Production Forest	A small part is Wildlife Conservation Area	Key Biodiversity Area	Large forest block	Old growth forests	146.839	118.059	Old growth forests may be subject to timber production

Key Biodiversity Areas with significant forest areas containing HCV 2 and/or HCV 3 areas

No	Region	Name of the Area	Forest Type	Legal Land Classification	Other Status	HCV 2	HCV 3	Total Area	Forest Area	Threats
13	Black Sea	Yenice Forests	Production Forest	There are two Nature Conservation areas and two Wildlife Conservation areas within the larger forest area	Key Biodiversity Area	Large forest block	Old growth forests	136.267	122.497	Old growth forests may be subject to timber production
14	Black Sea	Küre Mountains	Production Forest	There is one National Park and one Wildlife Conservation area within the larger forest area	Key Biodiversity Area	Large forest block	Old growth forests	523.408	307.195	
15	Black Sea	Ilgaz Mountains	Production Forest	There is one National Park and two Wildlife Conservation areas within the larger forest area	Key Biodiversity Area	Large forest block	-	153.646	94.719	

Key Biodiversity Areas with significant forest areas containing HCV 2 and/or HCV 3 areas										
No	Region	Name of the Area	Forest Type	Legal Land Classification	Other Status	HCV 2	HCV 3	Total Area	Forest Area	Threats
16	Black Sea	Sarikum Forests	Production Forest	There is a Wildlife Conservation Area within the larger forest area	Key Biodiversity Area	-	Floodplain forest	-	9.288	
17	Black Sea	Kelkit Valley	Production Forest	-	Key Biodiversity Area	-	Relict Mediterranean forest patches	179.561	78.400	
18	Black Sea	Notheastern Black Sea Mountains	Production Forest	There are several protected areas in the greater forest area	Key Biodiversity Area	Large forest blocks, species diversity	Old growth forests, relict forests	-	664.318	Old growth forests may be subject to timber production
19	Black Sea	Karçal Mountains	Production Forest	There are two Nature Conservation Areas in the greater forest area	Key Biodiversity Area	Large forest blocks	Old growth forests	145.758	98.048	Old growth forests may be subject to timber production
20	Mediterranean	Dilek Peninsula	Protected Area	National Park	Key Biodiversity Area	Species diversity	-	28.686	18.118	

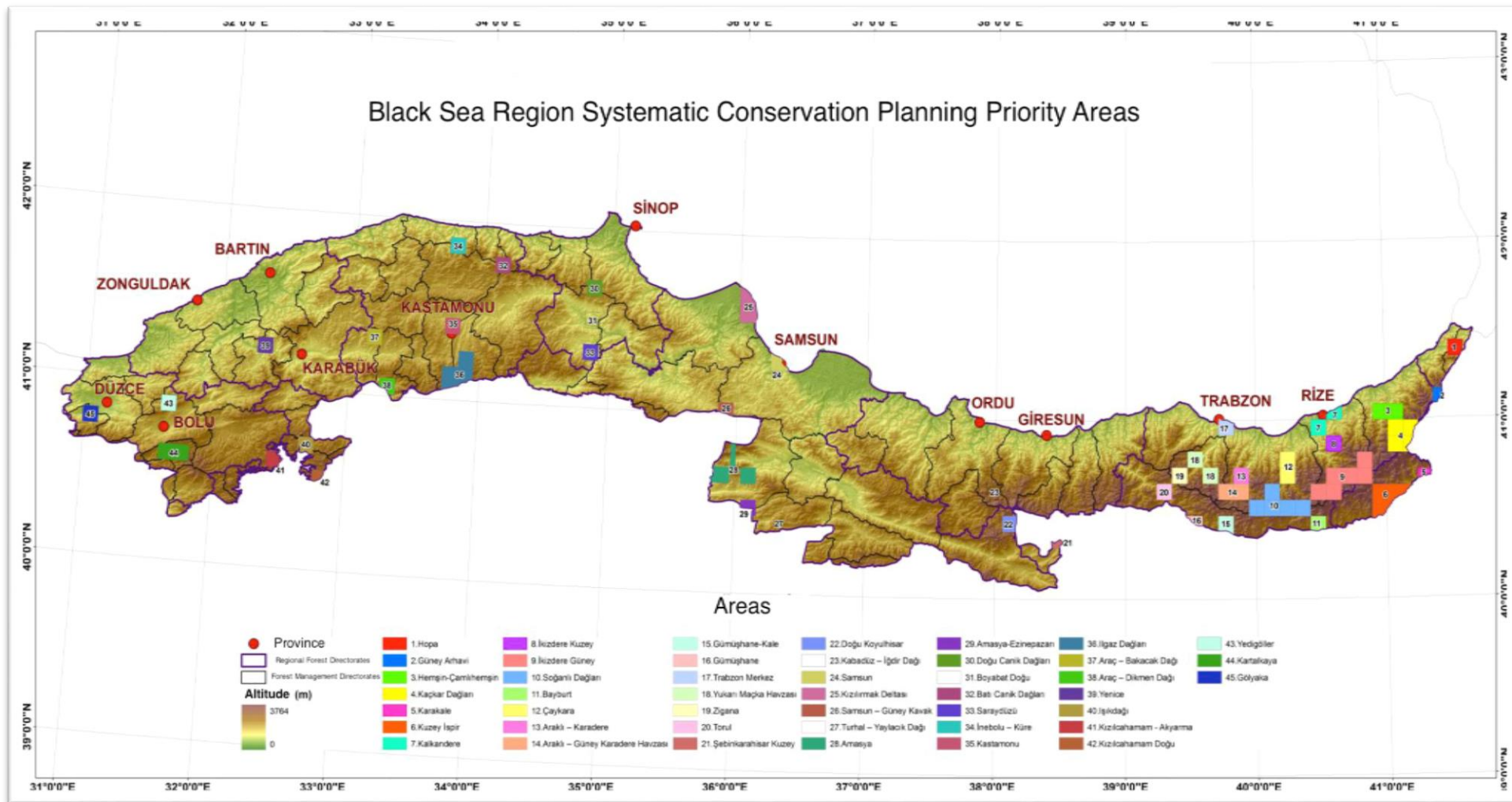
Key Biodiversity Areas with significant forest areas containing HCV 2 and/or HCV 3 areas										
No	Region	Name of the Area	Forest Type	Legal Land Classification	Other Status	HCV 2	HCV 3	Total Area	Forest Area	Threats
21	Mediterranean	Boz Mountains	Production Forest	There is a Wildlife Conservation Area within the larger forest area	Key Biodiversity Area	Species diversity	-	236.096	147.012	
22	Central Anatolia	Türkmenbaba Mountains	Production Forest	There is a Wildlife Conservation Area within the larger forest area	Key Biodiversity Area	-	Rare habitat for black vulture (<i>Aegypius monachus</i>)	54.062	47.141	Regeneration of forests threatens old trees which are nests to black vulture
23	Mediterranean	Datça-Bozburun Peninsula	Protected Area	Special Environmental Protection Area, partly National Park	Key Biodiversity Area	Species diversity, endemic tree species forest patches	Well protected areas of maquis	247.337	110.507	Production of non-timber forest products may threaten maquis
24	Mediterranean	Köyceğiz	Protected Area	Special Environmental Protection Area	Key Biodiversity Area		Rare floodplain sweetgum (<i>Liquidambar orientalis</i>) forest patches	39.844	21.749	

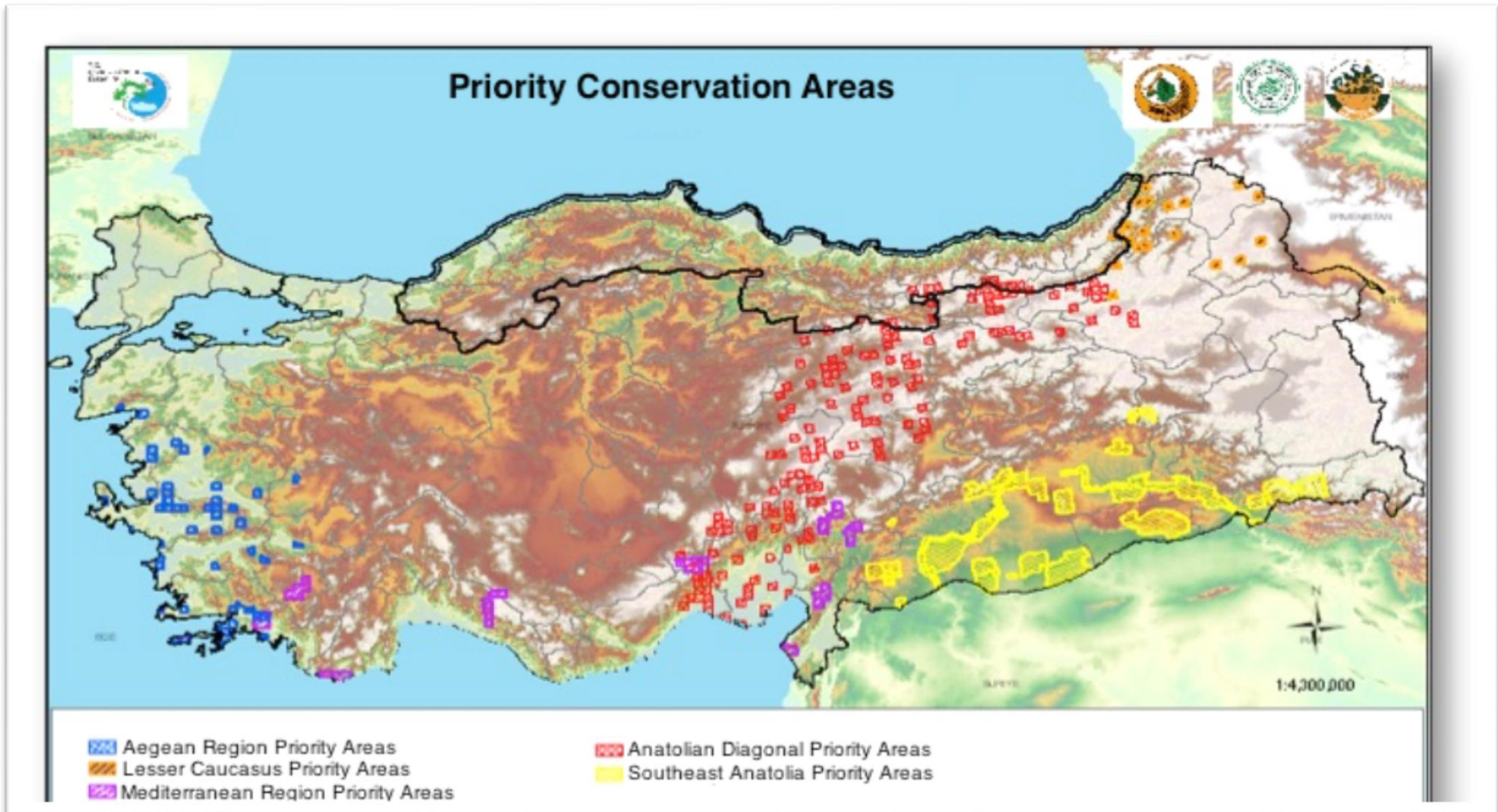
Key Biodiversity Areas with significant forest areas containing HCV 2 and/or HCV 3 areas										
No	Region	Name of the Area	Forest Type	Legal Land Classification	Other Status	HCV 2	HCV 3	Total Area	Forest Area	Threats
25	Mediterranean	Baba Mountain	Production Forest	Partly Special Environmental Protection Area	Key Biodiversity Area	Species diversity, endemic tree species forest patches	-	54.878	38.315	
26	Mediterranean	Sandras Mountain	Production Forest	-	Key Biodiversity Area	Species diversity	Old growth forests	133.674	124.708	Possible timber production from old growth forest patches
27	Mediterranean	Çıglıkara Forests	Protected Area	Nature Conservation Area	Key Biodiversity Area	-	Old growth forests	49.512	33.419	
28	Mediterranean	Akseki and İbradı Forests	Production Forest	There are several protected areas within the larger forest area	Key Biodiversity Area	Large forest block	Old growth forests	134.921	78.325	
29	Mediterranean	Amanos Mountains	Production Forest	There are two Wildlife Conservation areas within the larger forest area	Key Biodiversity Area	Large forest block	Relict forests	378.585	308.287	
31	Mediterranean	Tahtalı Mountains	Production Forest	There is a National Park	Key Biodiversity Area	Species Diversity	-	133.019	92.180	

Key Biodiversity Areas with significant forest areas containing HCV 2 and/or HCV 3 areas

No	Region	Name of the Area	Forest Type	Legal Land Classification	Other Status	HCV 2	HCV 3	Total Area	Forest Area	Threats
				in the larger forest Area						
32	Central Anatolia	Beynam Forest	Protected Area	Protection Forest	Key Biodiversity Area	-	Relict forests	5.239	1.385	
33	Eastern Anatolia	Munzur Valley	Protected Area	-	Key Biodiversity Area	-	Remnant forest	43.888	21.856	
	Eastern Anatolia	Sarıkamış Forests	Production Forest	There is a National Park within the larger forest area	Key Biodiversity Area	-	Forests providing habitat connectivity	65.831	33.054	

Appendix 5. Maps showing priority conservation areas obtained through Systematic Conservation Planning in six different regions in Turkey





Appendix 6. Map of registered archaeological, cultural and historical sites under protection.

