TPI Global Climate Transition Centre
Research and Data at LSE

INSIGHT BRIEF

October 2026

Tracking climate policy in the COP31 host country: Türkiye

In association with

Grantham Research Institute on Climate Change and the Environment

Summary

Türkiye's hosting of the UN climate conference COP31 in November 2026, in partnership with Australia, presents an opportunity for the Turkish Government to demonstrate leadership on climate change.

Türkiye's Climate Law of 2025 sets a direction towards net zero and establishes an emissions trading system (the TR-ETS). Building on this law and other existing policies, Türkiye can ramp up its efforts on both mitigation and adaptation through focusing on the following priority actions:

1. Establish a climate advisory body as part of the Climate Law to provide independent input on climate policies.
2. Set an absolute, declining emissions cap for the TR-ETS, consistent with both the Climate Law's definition of an ETS and Türkiye's 2053 net zero target.
3. Update the nationally determined contribution (NDC) with more ambitious climate targets for 2030 and 2035, ideally aligning with the global 1.5°C goal and at minimum matching the modelled reductions expected based on Türkiye's current policies.
4. Translate the NDC targets into pathways for each sector, particularly those not covered by the ETS.
5. Building on existing regulatory support for renewable energy, commit to phasing out coal power and join the Powering Past Coal Alliance, lending it diplomatic support as COP31 host.
6. Strengthen sector-specific policies for industry, buildings and transport and develop comprehensive legislation for land use, land use change and forestry (LULUCF).
7. Expand disclosure requirements for the private sector by requiring companies to develop and disclose transition plans.
8. Disclose public expenditures dedicated to climate-related goals and adopt climate budget tagging.
9. Commit to a clear timeline to phase out fossil fuel subsidies and lend diplomatic support to the Coalition on Phasing Out Fossil Fuel Incentives Including Subsidies (COFFIS) at COP31.
10. Reform public procurement rules to encourage life-cycle costing in procurement processes and introduce mandatory rules regarding the greening of government suppliers.
11. Develop an institutionalised approach to the just transition, involving social dialogue with workers, engagement with communities and vulnerable stakeholders and the establishment of an expert body to monitor the distributional impacts of climate policies.
12. Publish a Monitoring & Evaluation report to disclose progress on the implementation of Türkiye's National Adaptation Plan and widen adaptation efforts across all relevant sectors.

Authors

Antonina Scheer, Setenay Hizliok, Kate Higham, Dursun Baş and Helena Wright

The **TPI Global Climate Transition Centre** produces independent and forward-looking research and data on the progress of corporate and sovereign entities in the transition to a low-carbon economy.
www.transitionpathwayinitiative.org/

The **Grantham Research Institute on Climate Change and the Environment** brings together international expertise on economics, as well as finance, geography, the environment, international development and political economy, within a world-leading centre for policy-relevant research, teaching and training in climate change and the environment.
www.lse.ac.uk/granthaminstitute

The Centre and the Institute are based at the London School of Economics and Political Science (LSE), Global School of Sustainability.

LSE Global School of Sustainability

Foreword

Although Türkiye joined the Paris Agreement later than many of its peers, it has since taken important steps on climate policy: establishing a strong climate governance structure, adopting its first Climate Law, and launching a pilot emissions trading system. These new institutions and policy instruments now need to be matched by greater ambition.

In November, Türkiye will host COP31 in Antalya, where the matter of transitioning away from fossil fuels in a just, orderly and equitable manner will doubtless take centre stage. As the host, Türkiye's credibility will depend not only on its contribution to the negotiations but also on its actions at home. This is why tracking national climate action matters. As one of the world's largest emitters, Türkiye has a significant role in determining whether global climate goals are met. Independent tracking distinguishes announcements from implementation and enables comparisons across countries, helping assess whether collective efforts are sufficient. It also informs decision-making.

Governments can identify policy gaps, investors can assess transition risks, businesses can plan their own pathways, and citizens can ask informed questions. Drawing on a range of international trackers, this brief demonstrates the value of such evidence. The Istanbul Policy Center is pleased to have contributed to this work, bringing insights from policy processes we have closely followed in Türkiye and from our own research. I hope this brief helps make COP31 a turning point for both international climate action and Türkiye's domestic climate policy.

Dr Ümit Şahin

Climate Change Cluster Coordinator and Senior Scholar
at the Istanbul Policy Center, Sabancı University

Introduction

The role of the COP host

The Conference of the Parties (COP) is the decision-making body of the United Nations Framework Convention on Climate Change (UNFCCC), the international treaty established to address climate change. The treaty has been ratified by nearly every nation with some exceptions, notably the United States which recently withdrew. The annual COP meetings are the forum in which global climate action is negotiated between governments, with hosts rotating across regional groups. The role of the COP President is to work with country delegations to reach consensus on key issues and raise climate ambition internationally.

While hosting COP can bring benefits such as diplomatic standing, it can also raise scrutiny of the host country's domestic climate policy. Association has been found between hosting COP and a subsequent increase in the passage of climate-related legislation (Fankhauser et al., 2016). For example, during their respective presidencies, Chile began drafting its climate law, France and the United Arab Emirates passed new climate laws, the United Kingdom established a suite of policies, Azerbaijan published its first National Adaptation Plan and Brazil launched a climate strategy with sectoral mitigation and adaptation plans. In part, this may be explained by strategic timing whereby host countries make policy announcements to showcase their climate efforts while under the diplomatic spotlight. Still, hosting COP can be a reason to raise ambition, providing a window for policy innovation within the national context.

> "Hosting COP can raise scrutiny of the host country's climate policy."

Purpose of this brief

This brief summarises Türkiye's existing climate policies, notes areas of strength and recommends priority areas for improvement as the country prepares to host COP31.[1] While we focus primarily on mitigation policy, adaptation policy is also considered. Recommendations identify relevant 'coalitions of the willing' that can support Turkish policymakers; these are voluntary groups of countries that agree to move faster on a specific climate goal together, from the sidelines of the formal COP negotiations.

We leverage insights from a suite of publicly available climate policy tracking initiatives that were explored in a workshop at LSE in June 2026.[2] These trackers adopt different perspectives and methodologies and have complementary aims to map, analyse and/or evaluate policies related to climate change.[3] We combine the rich diversity of data provided by these trackers to develop recommendations for policymakers in Türkiye. These recommendations are also relevant for stakeholders including climate advocacy groups, civil society organisations, businesses and investors.

Türkiye: An emerging market with a crucial role in decarbonisation

Türkiye is an upper-middle-income member of the Organisation for Economic Co-operation and Development (OECD). Although its contribution to historical greenhouse gas emissions is small, a rapid increase in energy demand since around 2000 now places it among the world's 20 largest emitters. The country is exposed to significant physical climate risks including droughts, floods and wildfires. Therefore, as a highly energy import-dependent and fossil fuel-reliant economy with a net zero target for 2053, Türkiye needs to address both energy security and decarbonisation challenges while improving its resilience to climate change.

Türkiye has started to pursue energy diversification policies by deploying renewable energy. However, its long-standing agenda to transform the country into an energy trade hub is supported by oil and gas transmission infrastructure and energy market regulations. In 2025, the Turkish Government announced the continuation of intensified oil and gas exploration in the Black Sea and the Mediterranean, activities that are not aligned with the Paris Agreement's most ambitious temperature goal. No new, long-lead-time upstream oil and gas projects are needed to meet global fossil fuel demand in a 1.5°C scenario (IEA, 2025).

[1] For COP31, it was agreed that hosting responsibility would be shared between Australia and Türkiye. Türkiye holds the COP31 Presidency and is hosting the conference in Antalya, while Australia holds the role of 'President of Negotiations', with authority over the negotiations.

[2] The workshop brought together representatives of the data providers that curate the following climate policy trackers: Assessing Sovereign Climate-related Opportunities and Risks (ASCOR), Climate Actions and Policies Measurement Framework (CAPMF), Climate Action Tracker, Climate Change Laws of the World, Climate Change Performance Index (CCPI), Climate Policy Atlas, Climate Policy Database, Oxford Climate Policy Monitor and Climate Policy Radar. A more comprehensive list of climate policy trackers was compiled by the Oxford Climate Policy Hub.

[3] The brief primarily draws on data from these tools which have specific update cycles. As such, there may be some information gaps not covered by these trackers at the time of publication.

Phases of climate policy development in Türkiye

Development of climate policy in Türkiye can be mapped into three broad phases (see Figure 1). The country became a party to the UNFCCC in 2004, which built capacity in Turkish public bodies through the preparation of official submissions including a national emissions inventory. In 2009, the Environment and Climate Change Chapter of the EU was opened to accession negotiations and Türkiye became a party to the Kyoto Protocol. Until that time, climate-related policies in Türkiye focused narrowly on legislation targeting specific issues like renewable energy, energy efficiency and land use management.

In the second phase, from 2010 to around 2019, the Government began expanding policy efforts with its first climate action plans, a monitoring, reporting and verification (MRV) system and a range of sectoral initiatives.

The third phase is shaped by two developments. In 2019, the EU announced its Green Deal and a carbon border adjustment mechanism (CBAM), affecting Türkiye through its trade with the bloc. In 2021, Türkiye became a Party to the Paris Agreement. Since then, the country has progressed in its approach to climate change, including through the Sustainability Reporting Standards, Green Deal Action Plan and Climate Law.

While holding the COP31 Presidency, the Turkish Government could take advantage of this moment to spearhead a new phase of progress. Below we highlight strengths Türkiye can build on and provide recommendations for advancing this agenda.

Advancing mitigation policy to decarbonise the economy

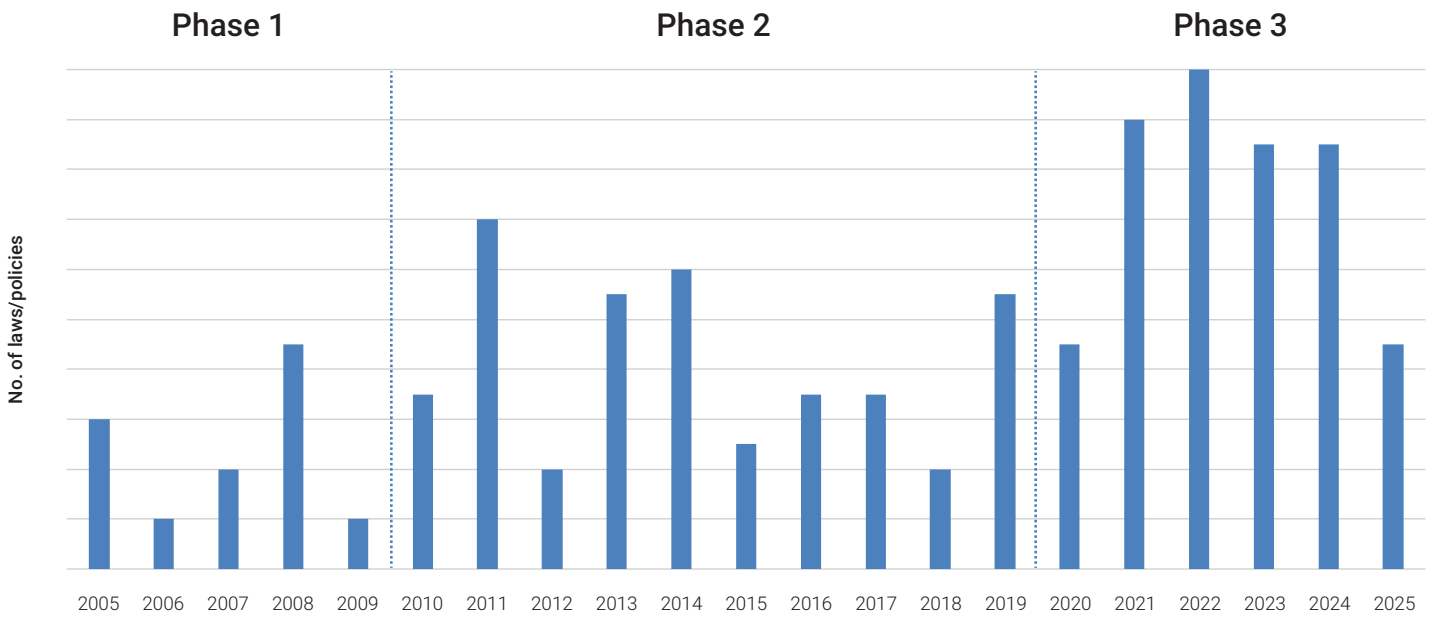
Climate framework legislation

Türkiye's Climate Law is a critical foundation for further climate action in the country. Adopted in 2025, it establishes a framework for climate policy covering mitigation and adaptation, focusing most directly on the former by setting a direction towards net zero, but without specifying a target year,[4] and by introducing an ETS.

Climate framework laws embed climate action into national policy and establish long-term strategic direction and relevant legal obligations, enhancing the credibility of national commitments. Specific accountability mechanisms can be built in to hold governments and private parties responsible for meeting defined obligations (Higham et al., 2021).

[4] Türkiye states a net zero by 2053 target in its NDC but this year is not legally enshrined in the Climate Law.

Figure 1. Count of climate laws and policies in Türkiye



Note: Some of the legislation in the graph has since been amended but appears only once in the year it was first adopted.
Source: Climate Change Laws of the World

Climate framework laws have proliferated in both high-income and emerging economies. Based on the Climate Change Laws of the World database, 73 countries have a framework climate law. Among the 85 countries assessed in the ASCOR tool, 44% – including Türkiye – have a climate law with accountability mechanisms, such as parliamentary interventions or judicial orders (Hizliok et al., 2025).

In Türkiye's case, the Climate Law establishes obligations for a specified set of companies to comply with the ETS and requires local authorities to develop climate action plans. The law refers to the country's net zero ambition and the targets in its nationally determined contribution (NDC) but it does not set a legally-binding obligation for the Government to meet these goals. As such, the law contains limited government-level accountability provisions.

Another approach for building accountability into climate laws is the establishment of climate advisory bodies, which can improve decision-making by providing science-based guidance and supporting collaboration across stakeholders. These bodies create a common and trusted information basis for policymaking and political debate on climate change (Averchenkova et al., 2024). According to the OECD's Climate Actions and Policies Measurement Framework, such bodies are in place in more than half of OECD countries.

Recommendation: Establish a climate advisory body as part of the Climate Law to provide independent input on Türkiye's climate policies.

"Türkiye's Climate Law is a critical foundation for further climate action in the country."

Carbon pricing

Türkiye's Climate Law introduces a price on carbon through an ETS. Nearly all the climate policy trackers explored for this brief indicate that pricing carbon emissions either through a carbon tax or ETS is important for driving decarbonisation.

The design and the timeline of Türkiye's ETS (TR-ETS) are largely shaped by the EU's CBAM, whose definitive phase began in 2026. The CBAM imposes a levy on the carbon content of imported goods which is adjusted depending on the carbon price in place in exporting jurisdictions. Türkiye's Green Deal Action Plan notes that EU climate policy has had a significant influence on Turkish climate policy. Given that the EU is Türkiye's largest trading partner, the CBAM will impact trade and competitiveness in affected industries like steel and aluminium. As a result, the Carbon Market Board announced the implementation of Türkiye's ETS in 2026–2027 whereby a pilot phase will begin with 100% free allocations to the sectors covered by the CBAM.

The Carbon Market Board Decision set out how the pilot phase will operate but a cap on total covered emissions has not been defined. This is despite the Climate Law defining an ETS as a "market-based mechanism that operates on the principle of setting an upper limit on emissions in line with the net zero emissions target, and that encourages emission reductions through the buying and selling of allowances". While no cap has been defined, the law also does not require the cap to decline over time, leaving the TR-ETS without a clear trajectory.

Recommendation: Set an absolute, declining emissions cap for the TR-ETS, consistent with the Climate Law's definition of an ETS and the 2053 net zero target.

Emissions targets

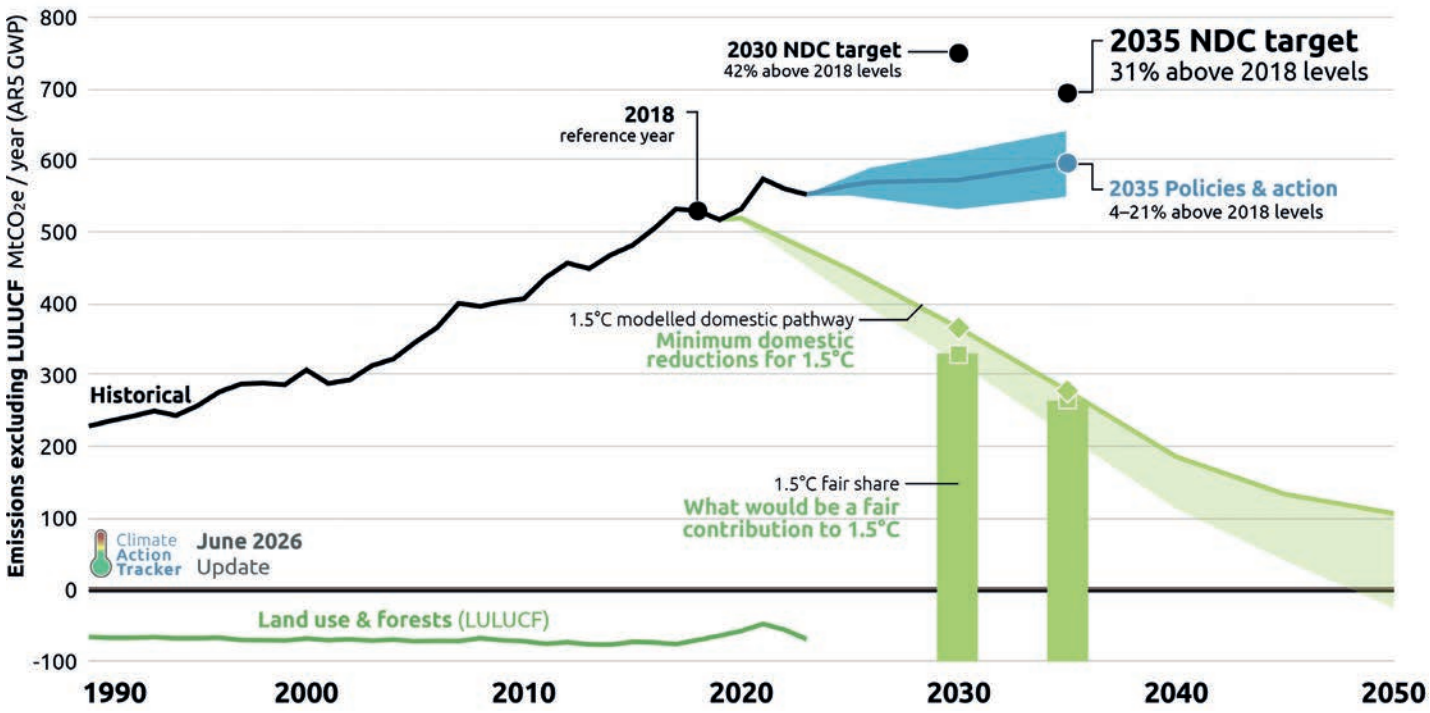
As part of the Paris Agreement, countries publish NDCs that state their emissions reduction targets. Emissions targets for 2030 and 2035 stated in Türkiye's latest NDC are critically insufficient to align with a future that limits global warming to 1.5°C above pre-industrial levels, according to both Climate Action Tracker and the ASCOR tool. Türkiye's targets allow national emissions to grow 31% by 2035 from 2018 levels, instead of falling in line with a 1.5°C scenario (see Figure 2). Türkiye's targets are insufficient even when using a 'fair share' approach to evaluating alignment, which allocates the global emissions budget to countries according to equity principles such as responsibility for cumulative historical emissions and the capability to act based on current income level.

In addition to evaluating NDC target alignment, the Climate Action Tracker also models a projection of national emissions based on current policies. This projection would see emissions from Türkiye rise by 4–21% in 2035 compared with 2018 levels, an increase that is significantly lower than the NDC target for 2035. This striking gap is fairly rare even among other emerging markets: countries usually set relatively ambitious NDCs which require further efforts beyond current policies to be met. Türkiye's NDC assumes emissions will grow well beyond the level current policies would imply, suggesting that the assumptions made in the development of the targets merit revisiting.

The Paris Agreement's target-setting process requires countries to commit to the highest possible level of ambition and Turkish civil society has called on the Government to revise the NDC (Climate Network Türkiye, 2025). While hosting COP31, Türkiye has a unique opportunity to establish goodwill in the negotiations by ramping up its own ambition.

Recommendation: Update the NDC with more ambitious climate targets for 2030 and 2035, ideally aligning with 1.5°C and at a minimum matching the modelled reductions expected based on Türkiye's current policies.

Figure 2. Türkiye's targeted emissions pathway



Source: Climate Action Tracker

Sectoral decarbonisation pathways

Neither the NDC nor the Climate Law provides a breakdown of targets, carbon budgets or peak-emissions years by sector. Sectoral decarbonisation pathways accompanied by relevant policies can guide corporates in their transition planning and help investors identify transition finance opportunities. Without sector-specific trajectories, it is difficult for civil society, researchers or international observers to assess whether Türkiye is on track to meet its targets, to identify which sectors are underperforming, or to hold specific ministries and institutions accountable for delivery. The lack of sectoral disaggregation also makes it harder for the Government to align sectoral strategies with the NDC targets they are meant to support. Research shows that sectoral emissions targets established in framework climate laws can drive further climate policy development (Averchenkova et al., 2024).

Recommendation: Translate the NDC into pathways for each sector, particularly those not covered by the country's ETS, namely transport, buildings, agriculture, land use, land use change and forestry (LULUCF), waste and small-scale industry.

[5] Türkiye's feed-in tariff also applies to geothermal energy, which is excluded from the Climate Policy Atlas assessment.

"Decarbonising the electricity grid would help Turkish industry reduce the embedded emissions of its products, strengthening its competitiveness in international trade."

Sector-specific policies

The electricity sector is the single largest source of emissions in Türkiye. The country has made progress modernising its energy infrastructure and expanding renewable power, but it relies on imported fuels that expose it to global energy price volatility. Türkiye supports renewable energy with tax incentives, support for domestic production and a feed-in tariff that applies to bioenergy, solar photovoltaic and wind power, as detailed by Climate Policy Atlas.[5] These schemes, alongside hydropower capacity, enabled more than 40% of the Turkish electricity grid to be powered by renewable energy in 2025 (IEA, 2026).

Energy efficiency is a critical lever for managing the growth in expected electricity demand. Türkiye has both a dedicated law and an economy-wide target focused on energy efficiency, according to the ASCOR tool. The country's energy intensity in megajoules per unit of GDP (adjusted for purchasing power parity) is 2.3, roughly half the global average (World Bank, 2021).

For genuine grid decarbonisation, however, growing renewable energy capacity and energy efficiency measures must be accompanied by a phaseout of fossil fuels. According to the Climate Actions and Policies Measurement Framework, Türkiye lacks a commitment to phase out coal power. It ranks 52nd in the Climate Change Performance Index, in part due to its subsidy package for domestic coal-powered generation, including price guarantees that constrain the deployment of renewable energy. Analysis of the Turkish grid confirms that coal power can be phased out while GDP and electricity demand continue to grow (Kat et al., 2023). Decarbonising the electricity grid would help Turkish industry reduce the embedded emissions of its products, strengthening its competitiveness in international trade.

The Powering Past Coal Alliance, launched at COP23, is a 'coalition of the willing' that brings together

nations, regions and businesses to share experiences and accelerate the transition away from coal-based electricity generation. As the COP host, Türkiye can demonstrate leadership by committing to phase out coal power, joining this high-ambition alliance.

Recommendation: Building on existing regulatory support for renewable energy, commit to phasing out coal power and join the Powering Past Coal Alliance, lending it diplomatic support as COP31 host.

Beyond electricity, Türkiye has notably weak policy coverage for the industrial, building and transport sectors, according to the Climate Policy Database and the Climate Actions and Policies Measurement Framework. The need for action in the forestry sector to preserve carbon sinks has also been highlighted by the Climate Change Performance Index.

The Turkish Government could consider addressing the following policy gaps in high-emitting sectors:

- Industry: Türkiye lacks large-scale incentives to reduce energy- or process-related industrial emissions and industrial support schemes for fuel switching. Transparent data on industrial emissions can provide a knowledge baseline for decarbonisation but facility-level pollutant and greenhouse gas emissions data are not yet publicly accessible despite ongoing work to develop the Pollutant Release and Transfer Register (Baş, 2025).
- Buildings: Although Türkiye has a dedicated roadmap for the buildings sector, it lacks support schemes for decarbonising heating, cooling, hot water or cooking as well as energy taxes that would incentivise emissions reductions in the sector.
- Transport: Although emissions performance standards for cars are in place, Türkiye has not gone further with a commitment to phase out internal combustion engine vehicles. Railway systems also need to be improved to provide accessible and low-carbon alternatives.
- Land use: Mandatory safeguarding policies against deforestation and their enforcement must be strengthened to protect forested land from conversion for mining and energy projects. The Climate Law contains general obligations to prevent losses of carbon sinks in forests, agricultural land, pastures and wetlands and to protect and expand them, but lacks standards for calculation methodologies, accounting and reporting; in contrast, these are clearly established in the EU regulatory framework.

Recommendation: Strengthen sector-specific policies across industry, buildings and transport and develop comprehensive legislation for LULUCF.

Mandatory corporate disclosure

Alongside sector-specific policies, mandating corporate climate-related disclosures can support transparency and facilitate transition finance flows. Türkiye has established mandatory disclosure requirements that align broadly with international standards, according to Oxford Climate Policy Monitor. Under the Türkiye Sustainability Reporting Standards TSRS 1 and TSRS 2, large companies (as defined by specified thresholds for total assets, net sales and number of employees) and all banks are required to disclose physical risks, transition risks and emissions. Türkiye is one of the few jurisdictions that requires entities to disclose their use of carbon offsets and removals as part of their sustainability reporting. However, there is currently no requirement for any companies to develop transition plans that would demonstrate how they will mitigate identified emissions and risks.

Recommendation: Expand disclosure requirements for the private sector by requiring companies to develop and disclose transition plans.

Transparency and direction of public finance

Public finance is a cross-cutting enabler of the mitigation policies discussed above. Transparency over fiscal expenditures that support climate action enables citizens, public finance analysts and other stakeholders to verify whether governments are financing their own climate commitments. Emissions targets may be aspirational but knowing how governments are spending resources reveals their fiscal priorities.

Most countries (71%) assessed by the ASCOR tool provide at least a basic level of transparency over their climate-related expenditures but Türkiye has no relevant disclosure in its budgets (Hizliok et al., 2025). It currently discloses expenditures related to broader environmental goals under its Sustainable Environment and Climate Change programme but does not identify climate-specific allocations. Providing an initial degree of transparency over how public finance is allocated to climate goals specifically would bring Türkiye in line with an increasingly common practice.

As a new member of the Coalition of Finance Ministers for Climate Action, which commits to integrate climate change considerations into fiscal planning and budgeting, Türkiye can improve its public finance transparency. For example, Türkiye could consider

adopting climate budget tagging, a systematic methodology to identify expenditures and quantify the impact of each spending item on the achievement of relevant climate commitments (Kirchhofer et al., 2021).

Recommendation: Disclose public expenditures dedicated to climate-related goals and adopt climate budget tagging.

Robust and time-bound commitments to phase out fossil fuel subsidies are also crucial to align public finance with the goals of the Paris Agreement. Subsidy reform is needed to adjust economic incentives to promote low-carbon energy sources. Despite pledges made by the G7 and G20, plans and firm deadlines to phase out explicit fossil fuel subsidies remain limited. Türkiye is among the countries with no commitment on this topic (see ASCOR tool and Climate Policy Database). As mentioned above, subsidy packages for coal use in power generation in Türkiye constrain the decarbonisation of the electricity sector.

International cooperation to eliminate fossil fuel subsidies is needed. The Coalition on Phasing out Fossil Fuel Incentives including Subsidies (COFFIS) is an alliance of 17 countries with the mission to accelerate subsidy phaseout by increasing transparency and encouraging coordinated action. Members must publish subsidy inventories and develop action plans to phase out subsidies within two years of joining. COFFIS represents another 'coalition of the willing' operating alongside the broader consensus-based COP process. As the COP31 host country, Türkiye could demonstrate leadership by joining COFFIS and lending it diplomatic support.

Recommendation: Commit to a clear timeline to phase out fossil fuel subsidies and join COFFIS, lending it diplomatic support as COP31 host.

Aligning public finance with stated net zero goals should also include public procurement, which accounts for 10.8% of Türkiye's GDP (OECD, 2023). Signs of progress in how Türkiye is using its public procurement to advance climate goals are emerging but scope for improvement has also been identified by the Oxford Climate Policy Monitor (Lecavalier et al., 2025). Türkiye has a notable policy for procuring green cement: a 2025 Communiqué introduced mandatory targets to reduce the carbon intensity of cement used in public works contracts.

However, Türkiye could take further steps to decarbonise its spending and consistently mainstream climate goals into its wider public procurement policy. Thirteen G20 jurisdictions encourage life-cycle costing in their procurement rules but Türkiye is not among them. This kind of costing would allow officials to consider whole-of-life emissions and costs rather than just the initial purchase price. Türkiye also has no rules regarding the greening of government suppliers, such as requiring bidders to have their own net zero targets or transition plans aligned with the national decarbonisation target.

Recommendation: Reform public procurement rules to encourage life-cycle costing in procurement processes and introduce mandatory rules regarding the greening of government suppliers.

Just transition

Countries can manage the social risks and opportunities of the low-carbon transition by developing institutional capacity to address the needs of workers and communities affected by decarbonisation. This emphasis on securing a just transition can help build public trust and prevent costly delays in decarbonisation.

Türkiye's Climate Law raises just transition as a cross-cutting theme and mobilises proceeds generated by the ETS to support just transition outcomes. Türkiye has climate-related policies that mention vulnerable groups, including youth and women, as well as an employment strategy that was developed in a participatory manner, according to Climate Policy Radar.

However, Türkiye lacks a national just transition framework to ensure inclusive climate action monitored by an expert body, which takes the form of a 'Just Transition Commission' in many jurisdictions (Heffron, 2021). This gap poses risks particularly for Turkish coal regions, where local communities are experiencing socioeconomic challenges (Akgul et al., 2024). Institutional mechanisms are needed to establish ongoing social dialogue with workers and engagement channels with relevant stakeholders including young people, women, local communities and civil society. This is a promising area for improvement as the Turkish Government is already in the process of preparing a National Just Transition Strategy.

Recommendation: Develop an institutionalised approach on just transition, involving social dialogue with workers, engagement with communities and vulnerable stakeholders and the establishment of an expert body to monitor the distributional impacts of climate policies.

Advancing adaptation policies to build resilience

Climate policy trackers, including those informing this brief, tend to emphasise mitigation-related policies, while the assessment of national adaptation policy is a less mature field. However, in the face of globally insufficient mitigation action, policymakers must also support the timely implementation of adaptation measures to address the physical impacts caused by climate change.

Three of the tools underpinning this analysis do shed light on Türkiye's adaptation policies. The Climate Change Laws of the World database maps adaptation policies and informed an assessment of adaptation governance in 35 countries, including Türkiye (Chan et al., 2026). The ASCOR tool's assessment of adaptation highlights Türkiye's strengths and gaps (see Figure 3) and Climate Policy Radar includes adaptation topics to pinpoint specific passages within laws, policies and UN submissions that refer to adaptation.

Governance, evidence and communication

Türkiye has established the initial foundations of its adaptation governance response. Since 2011, it has had a National Adaptation Plan (NAP) incorporated in its domestic policy landscape, with the most recent action plan published in 2024. Regarding the assessment of national climate risk, Türkiye has published projections modelling expected climate hazards. Under Türkiye's Climate Law, where adaptation provisions are broad and programmatic, it is a legal requirement that the adaptation plan and risk assessment are periodically updated. Türkiye also has a multi-hazard early warning system, which includes a weather monitoring system and a national communication system. The most recent action plan anticipates several improvements to this system.

> "Türkiye has established the initial foundations of its adaptation governance response."

With these foundations, there is room for improvement. Türkiye has not yet published a Monitoring and Evaluation report to showcase progress on the implementation of its NAP. Monitoring the implementation of adaptation goals is a crucial component of building effective climate resilience (Leiter, 2021). While such reports are considered in Article 4 of Türkiye's Climate Law, which requires annual monitoring of climate change, there is little specificity in the legislation on the format reports should take and, crucially, no indication of how the reports should be assessed (Chan et al., 2026). Research has suggested that such specificity is vital for ensuring that monitoring is effective in driving policy implementation (Averchenkova et al., 2024).

Figure 3. Assessment of Türkiye's adaptation policy

- **a. Has the country published a National Adaptation Plan?** ✔
- **b. Does the country regularly publish national climate risk assessments?** ✔
- **c. Has the country published a Monitoring and Evaluation report on implementing adaptation?** ✘
- **d. Does the country have a multi-hazard early warning system?** ✔
- **e. Is the country part of a sovereign catastrophe risk pool?** ✘

Source: ASCOR tool

Investment and finance

Investment and finance, including from public sources, are essential to the effective implementation of adaptation efforts. Recent research confirms that systematic costing and prioritisation of adaptation investments in NDCs, NAPs and sector strategies are important to ensure that measures are adopted (Coalition of Finance Ministers for Climate Action, 2025). However, no analysis of costs and benefits of adaptation measures appears in Türkiye's current NAP, nor is there any reference to requirements for such analysis in the Climate Law.

Sectoral integration

Türkiye's current NAP builds on sectoral- and local-level risk and vulnerability assessments. This aligns with other countries where a significant portion of adaptation-relevant laws and policies focus on environmental or ecosystem frameworks, suggesting that adaptation is still being primarily managed as an environmental rather than whole-economy issue (Chan et al., 2026). The opportunity to enhance Türkiye's sectoral response is already recognised in the NAP, which is structured to integrate adaptation into 11 critical sectors and identifies a set of revisions to sectoral policy needed to implement adaptation actions. Implementing these revisions urgently will support the success of Türkiye's national adaptation efforts.

Recommendation: Publish a Monitoring and Evaluation report to disclose progress on the implementation of Türkiye's NAP and widen adaptation efforts across all relevant sectors.

> "The Turkish Government has a unique opportunity to demonstrate climate leadership while holding the important diplomatic role of COP31 host."

Conclusion

To keep pace with the global low-carbon transition while ensuring resilience in the face of climate hazards, Türkiye must ramp up its efforts on climate change. These actions can bring significant co-benefits including for air quality, public health, energy security, job creation and trade (Helgenberger et al., 2020). We intend for this brief and its priority recommendations to contribute to informing policy decisions and announcements made in the lead up to COP31 and its aftermath. The Turkish Government has a unique opportunity to demonstrate climate leadership while holding this important diplomatic role.

References

Akgul O, Baş D, Asik G, Ozenc B, Sahin U (2024) *Perceptions and Policies of Just Transition in Türkiye: Local Case Studies of Yatağan and Çan*. Istanbul: Istanbul Policy Center, Sabanci University.

Averchenkova A, Higham C, Chan T, Keuschnigg I (2024) *Impacts of Climate Framework Laws: lessons from Germany, Ireland and New Zealand*. London: Grantham Research Institute on Climate Change and the Environment, London School of Economics and Political Science.

Baş D (2025) *The Decarbonization of the Turkish Steel Sector: Policy and Actor Analysis.* Istanbul: Istanbul Policy Center, Sabancı University.

Chan T, Mehryar S, Podestà M and Beswick A (2026) *Climate change adaptation laws and policies: a review of trends, gaps and opportunities in 35 countries*. London: Grantham Research Institute on Climate Change and the Environment, London School of Economics and Political Science.

Climate Network Türkiye (2025) Türkiye's Climate Target Increases Emissions Instead of Reducing Them. Webpage.

Coalition of Finance Ministers for Climate Action (2025) *How Ministries of Finance Can Assess and Manage Physical Climate Risks and Adaptation: Available Analytical Tools and Emerging Good Practice.* Report for the HP4 initiative 'Economic Analysis for Green and Resilient Transitions'.

Fankhauser S, Gennaioli C, and Collins M (2016) Do international factors influence the passage of climate change legislation? *Climate Policy*, 16(3), 318–331.

Helgenberger S, Jänicke M, Gürtler K (2020) Co-benefits of Climate Change Mitigation. In: Leal Filho W, Azul AM, Brandli L, Özuyar PG, Wall T (eds) *Climate Action. Encyclopedia of the UN Sustainable Development Goals*. Springer, Cham.

Heffron RJ (2021) *Achieving a Just Transition to a Low-Carbon Economy*. Palgrave Macmillan.

Higham C, Averchenkova A, Setzer J, Koehl A (2021) *Accountability Mechanisms in Climate Change Framework Laws*. London: Grantham Research Institute on Climate Change and the Environment and Centre for Climate Change Economics and Policy, London School of Economics and Political Science.

Hizliok S, Scheer A, Cristancho-Duarte C, Dietz D, Lutz S, Monsignori G, et al. (2025) *State of the Sovereign Transition 2025*. London: TPI Global Climate Transition Centre, London School of Economics and Political Science.

International Energy Agency [IEA] (2025) *The Implications of Oil and Gas Field Decline Rates*. IEA, Paris.

IEA (2026) *Türkiye 2026*. IEA, Paris.

Kat B, Şahin Ü, Teimourzadeh S, Tör O B, Voyvoda E, Yeldan A E (2023) *Coal Phase-out in the Turkish Power Sector towards net-zero emission targets: An Integrated Assessment of Energy-Economy-Environment Modeling*. Annual Conference on Global Economic Analysis.

Kirchhofer XV, Fozzard A, Almuzaini A, Erdem O, Leow W-J (2021) *Climate Change Budget Tagging: A Review of International Experience*. Prosperity Insight Series. Washington, D.C.: World Bank Group.

Lecavalier E, Gupta B, Hale T, Wetzer T, Lukin S, Neumann K, Zurcher N (2025) *Oxford Climate Policy Monitor Annual Review*. Oxford Climate Policy Hub, University of Oxford.

Leiter T (2021) Do governments track the implementation of national climate change adaptation plans? An evidence-based global stocktake of monitoring and evaluation systems. *Environmental Science & Policy* 125(2021): 179-188.

Organisation for Economic Co-operation and Development [OECD] (2023) *Government at a Glance Country Notes: Türkiye*. OECD, Paris.

World Bank (2021) Energy intensity level of primary energy. Webpage.

About the authors

Antonina Scheer is Deputy Director for Policy and Setenay Hizliok is a Policy Fellow at the TPI Global Climate Transition Centre. Kate Higham is a Senior Policy Fellow at the Grantham Research Institute on Climate Change and the Environment and co-lead of the Climate Change Laws of the World Project. Dursun Baş is a Senior Researcher at the Istanbul Policy Center, Sabancı University. Helena Wright is the Executive Director of Oxford Climate Policy Monitor.

Acknowledgements

The authors would like to thank the following reviewers: Jan Burck (Germanwatch), Tiffanie Chan (Grantham Research Institute), Auguste Tano Kouamé (Grantham Research Institute), Emma Lecavalier (University of Oxford), Ioannis Milioritsas (Friedrich Alexander Universität), Daniel Nachtigall (OECD), Carmen Nuzzo (TPI Centre), Michael Petroni (Climate Analytics), Jan-Luka Scheewel (NewClimate Institute), Joana Setzer (Grantham Research Institute), Anne Sietsma (Climate Policy Radar) and Silvia Weko (Friedrich Alexander Universität).

Georgina Kyriacou edited the brief. Layout by Zoe Kay.

Declaration of the use of AI: The authors used AI to support initial document review and language refinement but they verified all statements and did not use AI in the synthesis or final writing. Any errors or omissions remain those of the authors.

All photos from iStock except p2, by Engin Yapici on Unsplash.

The views expressed in this brief represent those of the authors and do not necessarily represent those of the host institutions or funders. The authors declare no conflict of interest in the preparation of this brief.

Licensed under a CC BY-NC 4.0 licence (Attribution-NonCommercial 4.0 International). For uses that fall outside this licence, please contact tpi.centre@lse.ac.uk.

This brief was first published in October 2026 by the TPI Global Climate Transition Centre at the London School of Economics and Political Science.

© The authors, 2026