












Life Beyond Limits **“Policy Brief on Air Pollution and Health in Turkey”**

All living beings have right to breath **clean air**.

Air quality limits vary among countries based on political choices rather than scientific evidences. Limits are the lines between the right to a healthy life and political choices. LIFE BEYOND LIMITS are not acceptable. Air quality limits should be uniform at the lowest level in all countries **without any doubts**.

Summary Data on Air Quality and Health in Turkey:

-  Yearly **30.000 premature** deaths from air pollution (1),
-  **No regulation** with limit values for PM 2.5 yet and only pilot measurement stations,
-  New limit values for **PM 10 will be 2 times of WHO guideline** (yearly) in 2019,
-  New limit values for **SO₂ will be more than 6 times of WHO guideline** (daily) in 2019,
-  **In 2017, only 1 out of 81 city had PM 10 levels below WHO guideline levels** (2),
-  In 2017, **PM 10 in 3 cities was not measured** properly (2),,
-  Real time measurement results of Istanbul (population of 15.03 million) was not published for 1 month in September 2018,
-  **Air quality at %67 of the cities are dirty even according to national air quality limits** (3),
-  7 existing coal power plants has exception to emit above EU limits until 2020,
-  In September 2018, 19.5 GW electricity generated from 26 coal-fired power plants and 38 GW **are planned and/or under construction** (4),
-  **No health impact or cumulative assessment in permit process of industrial facilities**, older version of dispersion modeling programs used at Environmental Impact Assessment processes,

Right to Clean Air Platform (Temiz Hava Hakkı Platformu), which consists of 17 professional organizations and NGOs working on environment and health in Turkey since 2015, proposes **“10 RECOMMENDATIONS”** to improve the air quality management and diminish the health impacts of air pollution in Turkey:

1 Measurement: *Reliability* of measurement data for all cities must be improved, public access to data by real time channels provided, data must be announced in an easily *understandable format*, all previous *non-disclosed measurement results* shall be made public, modelling studies to select locations of the new air pollution measurement stations should be conducted, publicly shared and the same criteria must be implemented for the existing stations.

2 Legislation: National legislations shall be adjusted to comply the limits of all pollutants including PM 10, PM 2.5, and SO₂ with the *air quality guidelines of WHO* and this must be applied to all industrial facilities in operation without any exception.

3 PM 2.5: Legally binding regulations about safe limits that are in accordance with *limits on PM 2.5 by WHO must be adopted* and the pilot *PM_{2.5} measurement* must be disseminated to all cities through the stations at places that are representative enough to show the impact of the air pollution on Turkish citizens.

4 Public Data: All data sources required in order to *calculate the health impacts and estimated premature deaths* due to air pollution in each city in Turkey must be urgently disclosed and made easily accessible to the public, NGOs and academia.

5 Permitting procedure: *Up-to-date modelling programs* that show cumulative impacts as well as PM 2.5 impacts in complex terrain must be used to calculate the air pollution dispersion that will result from the planned facilities as well as the existing facilities must be demanded from the investors during the approval during the *EIA (Environmental Impact Assessment)* approval processes of industrial investments.

6 Health Impacts: During the approval processes of all industrial investments "*Health Impact Assessment*" report that includes the change in premature death levels from air pollution must be demanded in addition to "Environmental Impact Assessment" from the investors and *active involvement of Ministry of Health* officials to the approval procedures of industrial facilities must be attained.

7 Ceasing subsidies for fossil fuels: State subventions on coal based energy generation must be ceased urgently, the *energy efficiency policies* shall be implemented and energy policies on renewable energy generation must be announced by the Ministry of Energy and Natural Resources.

8 Policy: Binding and applicable legal structures must be developed by the officers and authorities working on air quality management in order to prevent the air pollution as well as to *compensate the damages caused by air pollution*.

9 Alternatives: *Public transportation and bicycles* in cities shall be promoted, areas closed to motor vehicles shall be created, *forests* must be preserved and increased, legislative amendments shall be done to decrease the pollutant emissions caused by vehicles, alternative fuels to coal for household heating must be disseminated.

10 Cooperation: *Interdisciplinary work* among relevant state institutions, especially between the Ministry of Health and the Ministry of Environment and Urbanization, must be attained in order to make policies to evaluate the health impacts of air pollution during the permitting process of new industrial pollutants as well as maintaining *collaboration with professional organizations and NGOs* that work on air pollution and health.

Right to Clean Air Platform Turkey

The aim of the Platform is to advocate for the right to live in an environment with clean air and to protect the public health from the air pollution, especially resulting from the existing and the planned coal fired power plants in Turkey.

Platform Constituents: CAN Europe, General Practitioner Association of Turkey, Greenpeace Mediterranean, Green Peace Law Association, Green Thought Association, Health and Environment Alliance (HEAL), Physicians for Environment Association, TEMA Foundation (The Turkish Foundation for Combating Soil Erosion, for Reforestation and the Protection of Natural Habitats), Turkish Medical Association (TTB), Turkish Neurological Society, Turkish Respiratory Society, Turkish Society of Occupational Health Specialists (İMUD), Turkish Society of Public Health Specialists (HASUDER), Turkish Thoracic Society (TTD), Yuva Association, WWF Turkey, 350.org.



Right to Clean Air Platform Turkey (RtCAP) Policy Note, Nov 2018

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- (1) The Lancet Commission on Pollution and Health (2017).
- (2) Turkish Thoracic Society (TTD) Air Pollution Working Group (2018).
- (3) Chamber of Environmental Engineers ÇMO (2018), Hava Kirliliği Raporu 2017.
- (4) Europe Beyond Coal (2018), <https://beyond-coal.eu/data/>