**Request for information on PFOS - Turkey**

Turkey prepared the first NIP in 2004 to 2006 funded by GEF and revised it in 2010, submitted to the Stockholm Secretariat in 2011 which included initial 12 POPs issues of concern like uses, import, export, production, distribution in country and source related inventory, current stockpiles and its disposal options assessment, contaminated sites, POPs chemicals related infrastructure, legal instruments, monitoring, research and development capacity, monitoring system establishment and use.

The prepared plan was reviewed and updated, in accordance with the responsibilities to the Convention, by funding with GEF on capacity building between the years 2012-2013. The NIP Update process is conducted via following the Guidance for Developing a National Implementation Plan for the Stockholm Convention.

In this review and update study, an inventory of PFOS and related substances was prepared.

The study helped and solved the gaps in the implementation process, determine the actions and strategies for future implementation and strengthen the inter-institutional cooperation.

In order to deliver an accurate inventory not only different but also additive methodologies are used. These methodologies are listed as follows:

 Determination of the PFOS using sectors

o (metal plating, textile manufacturers and retailers, synthetic carpets, pulp and paper, semi-conductor, electronic and photographic, chemical industries and product supplier, retailers of commercial products, firefighting foam manufacturers and customers)

 Determination of the roles and responsibilities of stakeholders

o (Ministries, Chambers, Associations, Foundations, Manufacturers, Unions, etc.)

 Preparation of the questionnaires according to the Guidance on Conducting PFOS Inventory (Stockholm Convention Secretariat, 2012c, d), distribution of the questionnaires to the stakeholders and direct contact with the stakeholders when necessary

o (Phone calls, e-mails, etc.)

 Skimming the country database on chemicals

o (Customs and Trade Database on the basis of HS codes, Chemicals database on the basis of CAS no)

 Examination of applications in other countries,

o (PFOS HS Codes determined in other countries to monitor the customs when import/export of PFOS containing chemicals or articles (METIJ, 2011), vb.)

 Scanning national sector and sectorial reports,

o (Textile, ready-made clothing, leather, carpet, paper, cardboard sectorial reports, financial reports, press statements, press declarations, etc. (MSITT, 2012; MET, 2012; MSITT, 2013; PPIF, 2011))

 Scenario preparation when it is not known whether the article contain PFOS or not,

o (When the amount of PFOS in metal plating, textile, synthetic carpets, paper, cardboard and hydraulic fluids cannot be determined than scenarios are used to estimate the amount of PFOS)

According to the information gathered from e-mails and phone calls made with the importers of PFOS which is determined by the Prior Consent that has been sent by the EU Countries that are exporting the chemical to Turkey under the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade there is no PFOS production in the country whereas PFOS coming into the country via import. Moreover, the HS codes used when importing are determined with the phone calls made with the exporting companies. Using these HS codes the data on import of the chemical is obtained from the Ministry of Customs and Trade database.

The average amount of PFOS used in the country can be estimated as 850 tonnes if it is assumed that all the chemicals imported to the country under the 2923.90.00.90.19 HS Code. However, the exact amount of PFOS imported under the 2923.90.00.90.19 HS Code is not known. There is a decrease between the years 2008 to 2011 whereas a significant increase could be observed for the year 2012.

The amount of PFOS retained in the country on the article basis for the years 2011 is estimated as 120 000 tonnes from the import and export data by using HS codes.

Considering the uncertainties priority sectors:

 metal plating

 hydraulic fluids

 textile synthetic carpets

 paper and cardboard

sectorial reports are examined to determine the production, import and export amounts. The related results showed the largest amount PFOS use is in metal plating. In metal plating PFOS use is generally in chromium, copper and nickel plating, nevertheless chromium and nickel plating are not accounted in the inventory.

There are no data available on PFOS wastes, stockpiles and PFOS contaminated sites. However, further assessment on uncontrolled dump sites, sites that may be contaminated with PFOS containing products and petroleum refinery sites is required for future predictions.

Even if there is a remarkable effort by the Turkish Authority, currently there is no regulatory action on the availability, suitability and implementation of alternatives to PFOS and progress made in building the capacity of countries to transfer safely to reliance on alternatives to PFOS.