

Turkey



UK Seafood industry imports from Turkey 2018*

	Value, £	Weight, tonnes
Other Fish	26,054,894	2889
Seabass	8,423,538	1804
Seabream	5,153,385	1163
Trout	457,655	87
Anchovies	100,318	24

*Source: Her Majesty's Revenue and Customs (HMRC).

Introduction

This report is part of a series of country risk profiles that are designed to provide an understanding of the social risks associated with source countries that play a key role in the UK's seafood industry. Each report covers risks related to the production and processing of wild catch and aquaculture seafood products.

This report covers issues such as health and safety, working conditions, and impacts of the industry on local communities; and the mitigation efforts and regulatory frameworks put in place to address these issues.

This country risk profile has been compiled by Verisk Maplecroft on behalf of Seafish. Information on issues has been collated from publicly available sources, varying from international rankings and ratings, research by academics and other organisations, through to media articles. It has been prepared for general information only. You should not rely solely on its contents; always verify information from your own suppliers in your own supply chain. References for all information sources are provided.

Overview

Turkey's coastline spans more than 8,000 kilometres from 4 different seas – giving the country a rich and biodiverse coastline that can support plenty of economic activity. Currently, the EU is Turkey's primary market for seafood exports. In particular, the major seafood exports to the UK include, seabass, seabream trout and anchovies.

Social Risks

Forced labour, human trafficking and smuggling are not prevalent in Turkey's fishing sector, although health and safety remains a challenge. A 2018 study by Ozan Soykan, of Ege University's Faculty of Fisheries, states that "deficient sanitation which was reported to be accepted as a normal condition by trawl fishermen also leads biologic risk agents (bacteria, virus and etc) to form diseases. Biological risk factors are generally excluded in risk assessments due to lack of awareness."¹ And so workers continue to be exposed to agents which can adversely impact their health.

As is the case for fishermen in other countries, those in Turkey risk back and limb injuries and disorders due to the physically demanding, repetitive nature of their work. This includes carrying fish crates, ropes, nets and other gear. The vast majority if not all fishermen in Turkey do not have health insurance.

Health and safety regulations do exist for the fisheries sector in Turkey, but these are typically not enforced.

Most fishermen are unaware of these standards and how to apply them. As stated by Soykan "although regulation of occupational health and safety in fishing vessels...aim to improve the occupational conditions of commercial fishing vessels in Turkey, it is known that majority of fishermen community generally do not follow the laws and regulations."

That health and safety in the fisheries sector is not a priority for the authorities is reflected in the lack of government data on fisheries accidents. The ILO's most recent report on occupational accidents in Turkey refers to data from the Turkish government dating back to 2014 and makes no reference to accidents on commercial fishing or amateur vessels. According to the ILO report, Turkey registered 1,300 occupational accidents in agricultural work, forestry, horticulture, fish farming (but not conventional fishing) and work with animals in 2014.²

However, Turkey has improved control systems to monitor the production of fishery products intended for export to the European Union. According to the European Commission's 2018 audit on Turkey's control systems "there have in general been significant improvements particularly in relation to laboratory performance."³ The report states that since the last audit of 2011, Turkey's laboratory network has expanded and now engages in analysis of Dioxin, PCB and PAH in fish. The report went on to say that laboratories "participate regularly in proficiency testing with satisfactory/good results in examples examined in laboratories visited".

Turkey still has room to improve its control systems of vessels fishing for export to the European Union. In its 2018 report the European Commission underlined that, although the crew of Turkish fishing vessels use check-lists their results are not consistently recorded. The audit team noted that some provincial authorities have not been using the most recent checklists, which cover hygiene conditions.

Regulations and risk mitigation

Maritime Labour Convention (MLC) 2006 ratified by Turkey and will be registered by the International Labour Organisation and in full effect 12 months after registration. The MLC contains general provisions regarding operations, personnel requirements, health and safety, maintenance, documentation and other key aspects of commercial maritime operations. It should be noted that the MLC has been binding on Turkish vessels flying the flags of contracting states even before Turkey ratified the convention. Ship owners that violate these standards face huge financial penalties aimed to negate the unfair financial advantages benefited by those who operate substandard ships.⁴

International conventions and rankings

The following tables indicate which International Labour Conventions Turkey has ratified. The ratification of these conventions is a good indicator of a source country's commitment to enforcing internationally accepted best practices in the seafood industry when combined with thorough national legislation and well-resourced enforcement mechanisms.

International Labour Organization (ILO) Conventions	Ratification
Freedom of Association and Protection of the Right to Organise (No. 87)	Yes
Right to Organise and Collective Bargaining (No. 98)	Yes
Forced Labour (No. 29)	Yes
Abolition of Forced Labour (No. 105)	Yes
Equal Remuneration (No. 100)	Yes
Discrimination (Employment and Occupation) (No. 111)	Yes
Minimum Age (No. 138)	Yes
Worst Forms of Child Labour (No. 182)	Yes
Hours of Work (Industry) (No.1)	Yes
Weekly Rest (Industry) (No.14)	Yes
Protection of Wages (No. 95)	Yes
Minimum Wage Fixing (No.131)	Yes
Occupational Safety and Health (No. 155)	Yes
Occupational Health Services (No. 161)	Yes
Labour Inspection (No. 81)	Yes
Private Employment Agencies (No. 181)	No
Maritime Labour Convention (No. 186)	No
Work in Fishing Convention (No. 188)	No

United Nations (UN) Conventions	Ratification
Convention against Transnational Organized Crime and the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children	Yes
Convention against Transnational Organized Crime	Yes
Convention for the Suppression of the Traffic in Persons and of the Exploitation and the Prostitution of Others	No
Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families	Yes
Convention to Suppress the Slave Trade and Slavery	Yes
Supplementary Convention on the Abolition of Slavery, Slave Trade and Institutions and Practices Similar to Slavery	Yes

Other Conventions	Ratification
FAO Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing	Yes

Rankings in global indices

US Department of State Trafficking in Persons (TIP) Report

The TIP report is released annually by the US Department of State and offers a summary of the laws and enforcement efforts of various countries with respect to human trafficking. Specifically, it ranks countries based on a '3P paradigm' of prosecuting traffickers, protecting victims and preventing crime. Scoring on these elements is then collated to give each country a ranking. The rankings range from Tier 1, which indicates governments of countries that fully comply with the Trafficking Victims Prevention Act (TVPA) minimum standards for the elimination of trafficking to Tier 3 for the governments of countries that do not fully comply with the TVPA's minimum standards and are not making significant efforts to do so.

Rating: Tier 2

According to the US Department of State's 2019 TIP report, Turkey does not meet the minimum standards for the elimination of trafficking, but it is making efforts to do so. The government is slowly demonstrating improvements compared to the previous report, these efforts include – collaborating with a foreign government to identify 200 potential Turkish victims of forced labour. The Directorate General for Migration Management (DGMM) established a social security system that offers benefits and legal support to victims.⁵

Global Slavery Index

The 2018 Global Slavery Index measures the extent of modern slavery country by country, and the steps governments are taking to respond to this issue, to objectively measure progress toward ending modern slavery.

There are two rankings:

1. Rankings of countries by prevalence of the population in modern slavery. Rankings range from 1 to 167 - with 1 the worst and 167 the best, in terms of the prevalence of slavery.
2. Rank of countries in terms of government response to the issue. This is an indication of how governments are tackling modern slavery.

For prevalence Turkey ranks: 48/167 (where a ranking of 1 indicates highest risk).

Overall, Turkey is a medium risk country according to the index.

In terms of government response Turkey ranks B. This indicates the government has introduced a response to modern slavery with limited victim support services, a criminal justice framework that criminalises some forms of modern slavery or has recently amended inadequate legislation and policies), a body or mechanisms that coordinate the response, and has policies that provide some protection for those vulnerable to modern slavery. There is evidence that some government policies and practices may criminalise and/or deport victims and/or facilitate slavery. Services may be provided by the International Organisations (IOs)/NGOs with international funding, sometimes with government monetary or in-kind support. This is a good indicator that Turkey is slowly meeting targets.⁶

EU Illegal, Unreported and Unregulated Fishing Carding Process/Watch List

Under the IUU Regulation, non-EU countries identified as having inadequate measures in place to prevent and deter this activity may be issued with a formal warning (yellow card) to improve. If they fail to do so, they face having their fish banned from the EU market (red card) among other measures.

Turkey is not listed on the EU IUU watch list.

Endnotes

- 1 Soykan O, Ege University, 6 February 2019, Occupational risk factors of commercial fishing in Turkey, Available at: https://www.researchgate.net/publication/330901219_Occupational_risk_factors_of_commercial_fishing_in_Turkey
- 2 ILO, 2016, Occupational Safety and Health Profile – Turkey, Available at: https://www.ilo.org/wcmsp5/groups/public/-/europe/-/ro-geneva/-/ilo-ankara/documents/publication/wcms_498829.pdf
- 3 European Commission, 2019, Final Report of Audit, Available at: [European Commission, 2019, Final Report of Audit, Available at: https://ec.europa.eu/food/audits-analysis/act_getPDF.cfm?PDF_ID=14181](https://ec.europa.eu/food/audits-analysis/act_getPDF.cfm?PDF_ID=14181)
- 4 MLC 2006 Finally Ratified By Turkey, 10 April 2017, <https://ersoybilgehan.com/publication-detail/mlc-2006-finally-ratified-by-turkey/>
- 5 Trafficking in Persons Report, June 2019, <https://www.state.gov/wp-content/uploads/2019/06/2019-Trafficking-in-Persons-Report.pdf>
- 6 The Global Slavery Index, 2018, Findings – Importing Risk – Fishing. Available at: <https://www.globalslaveryindex.org/2018/data/country-data/turkey/>

For further information see the [Seafish ethics in Seafood web page](https://www.seafish.org/article/ethics-in-seafood).
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