



Ideal Versus Reality: Questioning the Inclusivity of Climate Change Policy Innovation Process in the Turkish Context



REVIEW PAPER

ABSTRACT

This research aims to reveal the extent on how governance culture is embedded in climate policy innovation processes in the Turkish context. In Turkey, the process deal with multilateral climate policies started in 2004, when the country announced to be a party of United Nations Framework Convention on Climate Change (UNFCCC). However, climate policies started to be developed in the 1990s, when the importance of governance began to gain considerable recognition. It is now possible to discuss to what extent governance-based approach has been followed in the processes of climate policy innovation until 2016, since it has been a quarter century from when the time both climate policies and governance began to take place on the public agenda in Turkey. In order to achieve its aim, the study focuses on the extent all related stakeholder groups participation in policy innovation processes in the case of the Coordination Board of Climate Change and Air Management (CBCCAM) through document analysis technique. The research reveals that governance culture has not been embedded in climate policy innovation processes in Turkish context. This study could help to provide a critical view of the embeddedness of governance culture in climate policy innovation processes through focusing on CBCCAM in Turkey.

Keywords: actors, climate policy, governance, inclusivity, ideal situation, policy innovation, Turkish context, CBCCAM

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INTRODUCTION

After reaching a scientific consensus related to the causes and results of climate change following the *First World Climate Conference* (1979). Climate change was accepted as a crisis that should be solved globally at the political level (Kulözü, 2017). Climate change policies that emerged in the 1990s (Huitema et al. 2011; Biesenbender and Tosun 2014), acquire their shapes as the product of a multi – level process leading from international to a local level (Kulözü Uzunboy 2020). According to Biesbroek et al. (2009) “developing coherent climate change policies is a complex puzzle of coordinating institutions, developing policy strategies and searching for feasible conceptual frameworks, from the international to the local level, to mainstream climate policy into sectoral and cross-sectoral policies.” Climate policies are a matter of multi-layer and sectoral processes from global to local since the source of the problem is the economic system including all production and consumption types. However, sectors related to climate change, such as energy, industry, agriculture, forestry, transportation, and housing have their dynamics in policy making processes. Each sector may be affected

by different priorities outlined in a process where actors of these sectors are included. Therefore, parts of climate change policies related to and determined individually for sectors cannot substitute climate policies that needs to be determined by involving all related sectors and actors.

The relationship between climate policies and each sector even individual can be defined through United Nations Framework Convention on Climate Change (UNFCCC) assigned by nearly all countries of the world. The objective of the Convention is defined by its second article as “...stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system (UN 1992)”. The concept of anthropogenic interference indicates the relationships between these policies and every single individual who is affecting climate and affected by climate change and the measures to be taken against climate change. When policy is defined as everything they suggest and do about the topics citizens are interested in, governments, at the national level, may be stated to be the first responsible agent for policy

making processes. However, making policy cannot be accepted as a process governments manage to complete alone. In the global context, it is commonly accepted that policy making processes and policies can only be legitimate with the participation and interaction of both governmental and non-governmental actors. In this line, decision-making processes should involve a wider range of actors including local, traditional, and indigenous communities, and non-government organizations (NGOs) instead of being dominated by the most powerful actors (*Stevenson and Dryzek 2014*). It is critically important for relevant actors to participate in policy innovation processes, have effects or have the real power needed to affect and produce policies by reaching consensus with other actors. Since only such an approach can increase the ownership of the matters. In this specific policy field, success can be accessible only when each stakeholder groups have common ownership of the policies. At this point, as stated by *Ostrom (2009)*, the role of nation-states is not limited to policy-making to fight climate change, but to ensure the new policies and policy-making processes democratic criteria. In our contemporary world, the bureaucracy of a nation-state not only implements the program for policy making and developed policy advice for political leaders, but also the manner of bureaucracy, influences the policy choices within different national settings in a different way. Policies and policy processes, which are shaped by the effects of administrative traditions, are related to how democratic and participatory an administrative system is, and it could be discussed based on the governance concept.

In our contemporary world, a governance approach is required in order to tackle both domestic and global problems effectively (*Keyman 2014; Stevenson and Dryzek 2014*). The governance-based system should connect and foster cooperation between NGOs, social movements, and individuals. A system developed based on a governance approach could be evaluated depending on its authenticity, inclusivity, consequentiality, same as inclusivity, non-discrimination/equality and rule of law/accountability, legitimacy, transparency, fairness, functionality and structural integrity, capability, and adaptability and availability of information, responsiveness, equity, efficiency and effectiveness and responsibility (*Stevenson and Dryzek 2014; UNDP 2011; Lockwood et al. 2010; Van Der Waldt 2014*). Depending on the aim of the study, the governance concept is mainly focused on its inclusiveness of various stakeholder groups, which is the common governance principle in the various studies, in terms of climate change policies. Based on the inclusivity criteria, the concept of “ideal situation” refers a democratic

policy innovation process including all stakeholder groups. The concept is developed, within the context of this study, based on the theory of communicative action and its central concept of the “ideal speech situation”. The theory is based on *Habermas’s (1984)* statement that the appropriate and democratic means of decision-making are required for all the relevant stakeholders who are focused on coming to an agreeing. *Habermas (1984)* also refers to the circumstances of the ideal speech situation: “excludes all force— whether it arises from within the process of reaching understanding itself or influences it from the outside-except the force of the better argument (and thus that it also excludes, on their part, all motives except that of a co-operative search for the truth)”. In the same line, the ideal situation is used in the present study as a democratic climate policy innovation process that is developed based on governance approach and is conducted by the participation of all the relevant stakeholders.

On the other hand, as it is stated by *Hilden et al. (2014)* and *Jordan and Huitema (2014)*, policy innovation can be interpreted in different ways such as invention, diffusion and evaluation. While the invention is defined as the source of new elements, diffusion refers to their entry into wider use, and evaluation means their subsequent effects (*Hilden et al. 2014; Jordan and Huitema 2014*). This study mainly focuses on invention as a source, since this could affect both diffusion and evaluation. Invention perspective of innovation is related to actors’ ability to explore (*Duit and Galaz 2008*) and in the words of *Jordan and Huitema (2014)* “exploration, novelty, experimentation, tinkering, discovery, recombination, new to the world”. On the other hand, the present study follows a policy innovation definition as “a program or policy which is new to the states adopting it, no matter how old the program may be or how many other states may have adopted it (*Walker 1969, as cited in Schaffrin et al. 2014*)”. In this respect, in the scope of the present study, the inclusiveness of the climate policy innovation process for stakeholder groups is investigated in the case of Turkey. In terms of the inclusivity of the policy area, *Turnpenny et al. (2005)* reveal that the policy processes in the United Kingdom have been shaped by the influences and conflicting objectives from many public, private, NGO and other sectors. In the same way, *Marks (2010)* argued that climate policy area has opened up and has been accessible to a greater diversity of actors like the mass media, the general public, and NGOs compared to China’s policy-making process. As seen in UK and Chinese cases, addressing the climate change demands an unprecedented level of cooperation (*De Boer 2009; Broto and Bulkeley 2013*) at a national level, not only between

institutional actors but also between non-institutional actors. On the other hand, the Coordination Board of Climate Change and Air Management (CBCCAM) in Turkey was the only official board since 2001 that was structured based on the governance mentality, intending to ensure participation of different stakeholder groups to climate policy innovation processes. Coordination and secretariat of CBCCAM have been carried out by the Ministry of Environment and Urbanisation (MoEU), the main responsible ministry for climate change in Turkey. For this reason, the first point to take into consideration to understand the climate policy innovation process should be CBCCAM. As a result, this study is focused on the actors' effectiveness in the climate policies innovation process in Turkey and the inclusiveness of various stakeholder groups, in the case of CBCCAM until 2016. In this way, this paper seeks to address the question "to what extent governance culture has been embedded in terms of policy innovation processes to respond to climate risks in Turkish context?"

MATERIALS AND METHOD

Turkish Context

Depending on the aim of this study, the contextual settings of Turkey will be presented under two headings as climate policies and administrative culture.

Climate Policy Process

Turkey is situated at the crossroads of Asia, Europe, and Africa. The country is a member of the Organization for Economic Co-operation and Development (OECD) and Group of 20 (G20), and a candidate for the European Union (EU) membership. While Turkey carries on membership negotiations with the EU, it participates in global negotiations within the scope of the UNFCCC in terms of climate change. In 1990, Turkey participated in the 2nd World Climate Conference that has been a starting point for the development of Turkey's climate policies.

Climate change was handled in a relatively narrow framework until 2004 when Turkey became a party to UNFCCC (*Kulözü 2017*). Moreover, in 2004, it was decided to start negotiations for EU accession and found the essence of climate change campaigns in civil society. Therefore, the climate policies of Turkey are evaluated in two periods as before and after 2004 (*Şahin 2014*). In the period before 2004, an important nationwide step was achieved at a national level and the Coordination Board of Climate Change (CBCC) was established in 2001

depending on a Prime Ministry Circular. According to *Talu (2015)*, the board, which laid the groundwork for Turkey's climate policy to be shaped by the decisions of senior politicians and bureaucrats, has changed a lot since its establishment. Bearing an insight suitable for governance mentality to ensure participation of various stakeholder groups in climate policy innovation processes, CBCC was restructured since its establishment for the first time in 2004. The Climate Change Department under the umbrella of the Ministry of Environment and Forestry (MoEF) was established depending on the General Directorate of Environmental Management in 2009 (*Kulözü 2017*). Then all issues related to climate change started to be handled by the department (*TR Ministry of Environment and Urbanization 2011*). In 2011, with the new arrangements made regarding the restructuring of Ministries, Climate Change Department is restructured under the General Directorate of Environmental Management in the body of the MoEU. After its foundation MoEU has become an institution that is the National Focal Point of the UNFCCC. In this context, the ministry conducts a national coordinator role for all activities related to climate change adaptation (*T.R. Ministry of Environment and Urbanization 2016*). During the time period between 2004 and 2016, CBCC was restructured in 2010 and 2012, and was reformed with the name CBCCAM in 2013. Although Turkey has a wide range of policies and institutions to address climate change in a wider perspective, it shows limited progress (*Turhan et al. 2016*). Turkey's "relative loneliness in UNFCCC negotiations" and "special circumstances" that were recognized legally by the country (*Cerit Mazlum 2017; Turhan 2017*), are the cases which prove this progress.

Administrative Culture

The administrative culture of Turkey is presented in this part by particularly focusing on governance culture that is required to fight problems such as climate change, effectively. Although, according to the 1982 constitution, central and local administrative parts constituted Turkish administrative structure (*Kulözü Uzunboy 2020*), centralist management understanding has been dominant. The central administration in Turkey rises on the presidency, the prime ministry, and the cabinet in addition to central and local structures of affiliates. In this context, ministers are on the accountable side and they are typical units of the centralist administration approach (*Lamba et al. 2014*). Ministers are all responsible for the determination and implementation of government and public administration policies under the chair of the Prime Minister (*Sayan 2013*). Each

minister is also responsible for the works, actions, and operations under his/her authority. Ministries, with the exceptions, are in a structure composed of departments involved by general directories directed by a deputy undersecretary. Departments may also be divided into branch management. In addition, working groups, expert groups, coordination boards, and other types of formations can be seen which can come together with bureaucrats and experts from other units (*Şahin 2014*). In this administrative structure, policy innovation processes are conducted under the authority of the related ministries through a department related to a policy focus area and/or the formations that are shaped under the departments. Although not active in policy innovation processes, the second side of the administrative structure in Turkey is made up of local administration units. Even the administrative system composed of central and local administrative parts (*Kulözü Uzunboy 2020*), does not provide any clues, governance has been on the academic and political agendas of the country within the context of public administration reforms since the 1960s.

In the Turkish context, public administration reforms gained importance and sustainability especially after the middle of the 1990s. At the same time, the importance of governance also gained significant recognition (*Gedikli 2009*), when governance was mentioned as a principle in the National Report and Action Plan of Turkey at the Habitat II Istanbul Conference (1996). Twenty years after, from an optimistic perspective, as *Şahin (2014)* stated, in today's Turkey, it can be mentioned that as the results of the EU negotiation process and reforms in public administration, an understanding begins to be extended including the private sector, civil society and other sides in convenience with governance approaches like developing strategies and project meetings or common project implementations. Even, from a more optimistic point of view, the Turkish public administration management left its place in governance at an early stage in 1991c (*Kayıkçı 2014*). However, from a critical perspective, governance could be defined as “an illusionary discourse (*Türkün 2011*)” within the hegemonic power relationships in the contemporary administrative system of the Turkish Republic. Controversial opinions about to what extent governance culture is settled may result from the conceptualization of governance in different ways. On the other hand, it may be thought that each institution advances in different sizes by passing from management to governance. Therefore, instead of a generalization as to whether Turkey experienced a passing from management to governance, the study focuses on if governance culture has been embedded in climate policy innovation processes, or not by considering CBCCAM.

Method of the Study

The study focuses on CBCCAM as the official board established to innovate climate policies in a multi-actor structure in Turkey, to answer the main research question “to what extent governance culture is embedded in policy innovation processes to respond climate risks in the Turkish context?”. To reach its aim, the following sub-questions should be answered within the context of the research: Who are the stakeholders of the climate policies in the Turkish context?; Which stakeholder groups are the parts of CBCCAM?; How do stakeholder groups being part of the board/have power in policy innovation processes? and How actors of the board or actor pattern of the board have been changed in its history?” Through the sub-questions, the inclusivity of the climate policy innovation processes may be evaluated. To reach the aim of this research, the document analysis technique was used. To evaluate the inclusivity of the climate policy innovation process, all stakeholder groups, categorized as institutional and non-institutional actors, should be presented in the Turkish context which is the answer to the first sub-question. Therefore, first, actors who should be part of climate policy innovation processes in an ideal situation are determined according to their relations with the topics based on the secondary sources. Then the main actors of real processes are presented with the history and changing pattern of actors of CBCCAM, through that other sub-questions have been answered. Depending on the focus of the study, the main secondary sources are determined as Prime Ministry Circulars 2001/2, based on that CBCC was established legally, the Circulars While based on the Circular 2001/2 CBCC was established legally, based on the Circulars 2004/13, 2010/18, 2012/2 CBCC was reformed. Additionally, based on Circular 2013/11 CBCC turned into a different form with the name of CBCCAM. The Circular determined the aim, working structure, coordinator, and participant of the board. Additionally, other secondary sources about the board such as related laws, national greenhouse gasses emission inventory reports, national climate change reports, action plans and climate change strategy, official websites of the board and the coordinator ministry and related literature were reviewed as the secondary sources.

RESULTS AND DISCUSSION

Freeman (2010) defines a stakeholder as “any group or individual who can affect or is affected by the achievement of the organization's objectives”. In the same line, *Bryson (2004)* defines “any person, group or organization that can place a claim on an organization's (or other entity's) attention, resources, or output or that

is affected by that output". On the other hand, actors are defined as "those individuals and groups, both formal and informal, which seek to influence the creation and implementation of these public solutions" (*Cahn 2012*). In the present study, difference between stakeholder and actor is seen at this point. Parallel to literature, the concept of stakeholder is used for all citizens or groups, but the concept of the actor is used for stakeholder groups that are active or at least included in the climate policy innovation process in the Turkish context.

Actors of the "Ideal" Climate Policy Innovation Processes

In the present study, actors of climate change policies are categorized mainly into two groups as institutional and non-institutional actors, inconvenience parallel to the general tendency in the literature (*Cahn 2012*; *Şahin 2014*). The most effective institutional actors in national policy innovation processes are accepted as ministries, being the most important structures of central administration in Turkey, their affiliates, and central directorate units. Climate change is in the interest and responsibility area of several ministries and public institutions with its various aspects ranging from economic sectors to foreign policy. Therefore, as stated by *Şahin (2014)* the number and variety of ministries and affiliates interested in climate policies should be much more than that in other fields. The second important institutional actor group should be local authorities constituting the second stage of the administrative structure. In struggling with climate change, local administrations are among the most important actor groups since as stated by *Demirci (2014)* they are parts of both the problem (*Lindseth 2004*) and its solution (*Bulkeley et al. 2011*). In addition, the centralization trend was seen at the beginning of 2000, which may be an the indicator that local authorities should take place in the climate policy-making process as discrete actors in the Turkish context. The third group of institutional actors is the legacy group, which is composed of TBMM (The Grand National Assembly of Turkey) and the political parties with a group at the Assembly. The most important actors in climate policies may be legacy group in the countries like Turkey, where policies are determined in the frame of laws and decisions the Assembly adopted. The general election helps once in four years to select deputies working in TBMM and so, the structure of the Assembly changes. After the general election held on 2015, the political parties in the Assembly were

determined as follows; AKP (Justice and Development Party), CHP (Republican People's Party), BDP (Peace and Democracy Party), and MHP (Nationalist Movement Part). On the other hand, there are 13 parties taking place 2015 election but voted insufficiently to have deputies and so remained out of the Assembly. Even though not represented in TBMM, they absolutely have a certain amount of voters, but they are not included in the legacy process and should participate in climate policy innovation processes as non-institutional actors.

As the commonly accepted private sector is one of the most important non-institutional actor groups in climate policy innovation processes. Due to the fact that policies are mostly applied by the private sector, companies' strategies play important roles in overall policies and the private sector follows competitiveness and profitability, companies and capital owners are important actors. Democratic Mass Organizations (DMOs) should be taken into consideration as the 3rd non-institutional actors.¹ DMOs such as the Union of Chambers of Turkish Engineers and Architects (UCTEA) which are not NGOs due to their membership systems and legal establishment procedure, may undertake a close role in environmentalist civil societies in their functions. However, there are other types of DMOs such as the Turkish Industry and Business Association (TOBB), Turkish Industrialists and Businessmen Association (TÜSİAD), Independent Industrialists' and Businessmen's Association (MÜSİAD), that are closer private sector than civil society. Another important group of non-institutional actors in the climate policies innovation process includes NGOs. In the Turkish context, NGOs can open the gates for individuals in a society to be the public's subjects without joining a political party and add new meanings to their lives (*Tekeli 2012*). In the climate change field, NGOs constitute the largest and the most diverse non-institutional side. Universities and institutions working on research and education for climate change, independent experts and researchers make up a non-institutional actor group. In the innovation processes of climate policies, academicians constitute an important actor group with their roles of conducting scientific studies, giving advice, and representing updated scientific consensus at scientific meetings (*Şahin 2014*). The last non-institutional actor group which needs to take place in the national climate policy innovation process includes international associations. Such actor groups, which cannot be counted among the NGOs, may be intergovernmental foundations such as United Nations Development Program

¹In Turkey's democratic practice, all the structures other than public institutions are accepted to be NGOs regardless of their differences. However, DMOs are differs from NGOs in such a way that DMOs are the organizations of the groups coming together to defend their interests in the conflicted political public field and increase their interests through negotiations (*Tekeli 2012*).

(UNDP) and Regional Environmental Centre – Turkey (REC) established under the umbrella of the UN or in accordance with a treaty². In sum, as the main actors of climate change policies in the Turkish context Ministries and their affiliates (central administration units), local governments and legal authorities are accepted to be institutional actors while political parties with no group at the Assembly, NGOs, DMOs, private sector, academy and international foundations are non-institutional actors (Table 1).

Reality: Actors of Climate Policy Innovation Processes

Within the context of the institutional structuring for climate policy innovation, the first thing Turkey did is establish of CBCC in 2001 based on a circular of the Prime Ministry. After 15 years from its inception the establishment aim of the board today is defined as “to take required measures to prevent harmful effects of climate change, to make more efficient works, to provide coordination and collaboration between relevant public and private sector institutions and organizations, and to determine suitable domestic and foreign policy by considering the conditions of Country (*T.R. Ministry of Environment and Urbanization 2016*)”. From its establishment based on Prime Ministry Circular 2001/2 onwards, CBCC was reformed three times in accordance with the Circulars 2004/13, 2010/18 and 2012/2. Through Circular 2013/11, the Board turned into a different form with the name CBCCAM.³

In 2001, CBCC began to work with the participation of the Minister of Environment (MoE) that has role of both chair and secretary. The purpose of the establishment of CBCC was “coordination of future works and take

all the national attempts related to climate change into account from a more strategic point of view (*TR Prime Ministry 2001*)”. Among the actors defined to form CBCC in 2001, only TOBB took place in it out of public institutions, the number of which was then 12 (Table 2). In 2004, CBCC was restructured and the definition of the establishment aim of CBCC was enlarged compared to Circular 2001 as follow; as “to take required measures to prevent harmful effects of climate change, to achieve more productive works by providing coordination and responsibility distribution between relevant institutions and establishments determine suitable domestic and foreign policy by considering the conditions of Country (*TR Prime Ministry 2004*)”. With the new arrangement, MoEF⁴ became the chair and secretary of CBCC. Moreover with the new regulation it became possible for the Board to invite the administrators of relevant institutions to the meetings when necessary. However, only the member of public institutions and ministries was again TOBB reduced to eight members only (Table 2). In 2010, the Board has restructured. However, its aim was not changed. The new regulation in the Board brought a new DMO actor, TUSIAD, in addition to TOBB together with 11 public institutions (Table 2). the previous period designed depend on Circular 2004, “...if needed, the Board can invite the representatives from other ministers, public institutions and organizations, universities, NGOs, vocational unions and private sector” and “...establish sub-boards and-committees, and working groups possibly involving the representatives from universities, NGOs, vocational unions and private sector, in addition to related public institutions and organizations...” (*TR Prime Ministry 2010*). Such statements show that even though the Board leaves the control to the public side, other stakeholder groups begin to be recognized in 2010. On the other hand, in 2011 the chairmanship of the board became the MoEU, which became responsible for the works planned related to climate change depending on its establishment decree. A duty of MoEU was explained in the decree “to establish coordination between institutions and organizations to determine the plan, policy and strategies for taking actions against global climate change and ozone layer depletion (*TBMM 2011*)”. The General Administration of Environmental Management was working under the umbrella of the MoEU. After the reconstruction of ministry structures, in 2012 a circular was declared about CBCC. The aim of the Board was declared as “taking required actions to prevent harmful effects of climate change, determination of compatible policies with the conditions of the Country and

Table 1. Actors for climate policy innovation processes in an ideal situation.

	Actor groups
Institutional actors	Central administration units Local Governments Legacy groups (TBMM and political parties with seat in the Assembly)
Non-institutional actors	Political parties with no seats in the Assembly Private Sector DMOs NGOs Academy International organizations

² These international foundations had roles and importance in the development of climate policies in Turkey especially between 2004 and 2009.

³ In this respect, it must be noted that every changing circular abandoned the previous one.

⁴ In 2003, Ministries of Environment and Forestry were combined to form a new ministry named Ministry of Environment and Forestry.

Table 2. Changing pattern of the actors in CCBC/CBCCAM since from 2001-2016.

CBCC				CBCCAM
2001	2004	2010	2012	2013-2016
CHAIRMANSHIP OF THE BOARD				
Ministry of Environment (MoE)	Ministry of Environment and Forestry (MoEF)		Ministry of Environment and Urbanization (MoEU)	
INSTITUTIONAL ACTORS OF THE BOARD				
Ministry of Foreign Affairs (MoFA)				
Ministry of Transport (MoT)			Ministry of Transport, Maritime and Communications (MoTMC)	
Ministry of Agriculture and Rural Affairs (MoARA)			Ministry of Food, Agriculture and Livestock (MoFAL)	
Ministry of Industry and Trade (MoIT)			Ministry of Science, Industry and Technology (MoSIT)	
Ministry of Energy and Natural Resources (MoENR)				
Ministry of Forestry (MoF)	Ministry of Environment and Forestry (MoEF)		Ministry of Forestry and Water Works (MoFWW)	
Ministry of Environment (MoE)				
Undersecretariat of State Planning Organization (SPO)				
Undersecretariat of Exterior Commerce (UoEC)				
Undersecretariat of Treasury (UoT)		Undersecretariat of Treasury (UoT)		
State Meteorology Affairs General Manager (SMAGM)				
Turkish Statistical Institute (TSI)				Turkish Statistical Institute (TSI)
	Ministry of Public Works (MoPW)			
		Ministry of Finance (MoF)		
		Ministry of Health (MoH)		
		Ministry of Economy (MoE)		
		Ministry of Development (MoD)		
				Disaster and Emergency Management Presidency (DEMP)
				Ministry of National Education (MoNE)
				Ministry of European Union (MoEU)
				Ministry of Interior Affairs (MoIA)
NON-INSTITUTIONAL ACTORS OF THE BOARD				
Turkish Union of Chambers and Commodity Exchanges (TOBB)				
		Turkish Industry and Business Association (TUSIAD)		
				Independent Industrialists' and Businessmen's Association (MUSİAD)

constructing coordination and cooperation between public and private institutions and establishments” (*TR Prime Ministry 2012*). Out of 11 Ministries and their affiliates, two actors taking place on the Board were TOBB and TÜSİAD (**Table 2**).

However, in 2013, CBCC was combined with the Coordination Board of Air Emissions (CBAE), which was founded in 2012, and a new board was renamed CBCCAM. This decision was explained in the circular as follows; “struggle with climate change and air emission management are topics related to each other and should be taken into consideration in a complementary way and at national level relevant establishments and institutions should be partner” (*TR Prime Ministry 2013*). Through this, it is aimed to simplify bureaucracy and to prevent a waste of time. The aim of the Board is explained as “to improve the inventories of national air emissions and greenhouse gas emissions by containing data of the Country, collect detailed data related to activity fields contributing to the formation of sectoral emission, determine national emission factors, take required measures to prevent harmful effects of climate change, determine suitable domestic and foreign policy by considering the conditions of Country and provide coordination and collaboration between relevant institutions and establishments to determine strategies for the reduction of emission (*TR Prime Ministry 2013a*)”. The Circular suggests a situation similar to that in 2010 where public institutions take control however, participation of other stakeholders is also accepted. On the other hand, the Board was added as the 3rd nongovernmental actor apart from TOBB and TÜSİAD, in addition to 15 institutional actors in the 2013 restructuring process (**Table 2**). Moreover, based on the 2016 structure of CBCCAM, the Disaster and Emergency Management Authority (DEMP) and Turkish Statistical Institute (TSI) were also included in the Board as two new institutional actors after the Prime-ministry circular in 2013 (*T.R. Ministry of Environment and Urbanization 2016*). In addition to the actors who seem like parts of climate policy innovation processes, the activeness of these actors should be discussed to reveal the inclusivity of the policy-making processes in the CBCCAM. In order to understand the inclusivity of the board in terms of its actors, the working groups should be presented. When considering the working system of the Board, it is emphasized in 2001, 2004, 2010 and 2013 circulars that sub-working groups may be formed for the Board to achieve integral and coordinated work. It is stated even in 2010 and 2013 circulars that if the Board needs, it can establish sub-committees or groups involving relevant public institutions, non-governmental stakeholders,

universities, vocational unions and representatives of the private sector. After being restructured in 2013, there are seven working groups under CBCCAM called Reducing Greenhouse Gas Emissions; Impacts of Climate Change and Adaptation; Air Management; Education, Awareness Raising of Public and Capacity Development; Inventory of Greenhouse Gas Emissions; Finance; and Technology Development and Transfer (*TR Ministry of Environment and Urbanization 2015*) (**Table 3**).

It is conferred from when the present actors of seven working groups are considered that only 13 of 20 CBCCAM members are included in these working groups, four of seven working groups are organized under the coordination of MoEU and only two of these 4 working groups work actively as a group (**Table 3**). The rest of the seven working groups (three working groups excluded by MoEU) are organized under the coordination of the Turkish Statistical Institute (TSI), Undersecretariat of Treasury (UoT), and Ministry of Science, Industry and Technology (MoSIT). On the other hand, there are five working groups in those there is not any member except the coordinator. Therefore, it is hard to say that these five groups are actually working as a group. In this line, MoEU, as the manager of the board, is the most active member as being the coordinator of four working groups; MoSIT, Ministry of Transport, Maritime and Communications (MoTMC), Ministry of Food, Agriculture and Livestock (MoFAL), Ministry of Forestry and Water Works (MoFWW) and MoE are the second most active members being part of two working groups. While TSI, UoT, Ministry of Energy and Natural Resources (MoENR), Disaster and Emergency Management Presidency (DEMP) and MoH and Ministry of Culture and Tourism (MoCT) are only members of a working group, 3 non-institutional actors of the Board (TOBB, TUSIAD and MUSIAD) are not included in any working groups as member or coordinator. On the other hand, circular 2013 has opened a path for the participation of institutional and non-institutional actors, who are not a member of the Board, but with the “if needed” phrase. However, there is only MoCT takes place in the subgroup even though it is not among the member of CBCCAM.

CONCLUSION AND RECOMMENDATIONS

In the area like a multi-faceted climate change problem, it is better to design the policy innovation processes with the participation of different actors. However, it is not as easy to construct a democratic negotiation process as it is written. In a complex political field including many stakeholders from different areas, containing private interests, the main determinant is not

Table 3. Working groups under CBCCAM, their coordinator institutions and members.

WORKING GROUPS							
	Reducing Greenhouse Gas Emissions	Impacts of Climate Change and Adaptation	Air Management	Education, Awareness Raising of Public and Capacity Development	Inventory of Greenhouse Gas Emissions	Finance	Technology Development and Transfer
ACTORS							
MoEU			Coordinator				
TSI					Coordinator		
UoT						Coordinator	
MoSIT	X						Coordinator
MoTMC	X	X					
MoFAL	X	X					
MoFWW	X	X					
MoE	X	X					
MoENR	X						
DEMP		X					
MoH		X					
MoCT		X					
NOT ANY DEFINED ACTORS							

democratic structures many times but hegemonic power relations.

In addition, it is more complex in a country like Turkey to have a centralist administration culture to design and sustain multi-actor climate policy innovation processes. In discourse, governance is accepted to be a key concept to solving global problems in Turkey in academic and political environments. In the ministry type administration system, climate policies are determined mainly by the government in the frame of laws and decisions accepted by the Assembly. However, policy innovation processes are carried out by the related ministry, which is MoEU in climate policies and CBCCAM works on the matter with the chair of MoEU.

Some important actors out of public institutions began to be included in CBCCAM providing a continuous dialogue medium in 2004 with TOBB followed by TÜSİAD in 2010 and MÜSİAD in 2013. Such a condition may be evaluated to show the regular increasing effect

of actors out of public institutions in Turkey's climate policies. However, only the participation of DMOs who are closer to the private sector than civil society, in the process of institutional actors means two-level governance. That reveals, unfortunately, as emphasized by Şahin (2014), in Turkey, the state accepts directly and only the private sector to be the policy actor out of government, but stakeholders of climate policies are not confined to these two actor groups. Out of these two actor groups, local administrations from public side, legislation organ, NGOs, DMOs including professional chamber, political parties with no seat in Assembly, international organizations and academia out of ministries and their affiliates can be included. Especially local administrations are important actors in these processes since due to their scales they are suitable for the application of participatory practices. In addition, when considering the members of CBCCAM and to what extent they are active participants of the Board, it cannot be stated that there is a governance mechanism in it since only two of seven working groups in the Board have a

multi-actor working system and MoEU is responsible for the coordination of both of them. In addition, 3 actors that are out of public institutions are not represented in any of these 7 working groups.

Therefore, it is not possible to accept that CBCCAM works inconvenience with a governance approach in terms of inclusivity, for both stakeholder groups in an ideal situation and working structure and formed a multifaceted dialogue and negotiation ground. Nevertheless, there is no sharing platform for different actor groups out of CBCCAM to be in dialogue and interact with each other and make a contribution to the innovation of climate policy together. For this reason, it is not possible to mention the embedded governance culture in policy innovation processes to respond to climate risks in the Turkish context, in other words, the presence of a democratic negotiation process. Based on this reality, the priority may be defined as forming a ground where negotiation opportunities can be improved on climate policy innovation.

As discussed by Massey *et al.* (2014) and Kulözü (2017) in the case of adoption and diffusion of climate policies, every single country has its drivers and barriers both internal and external. In the same way, climate policy innovation processes of each country have their dynamics depending on the contextual characteristics. In Turkey, it is hoped that a more democratic and multi-partial policy process will be possible due to the existence of public administration with a reform capacity and developing climate movement. However, it is a requirement to solve the inclusivity problem in the development of climate policies. Both capacity of the policy innovation and turning the innovated policies into practice could only be achieved at the end of a negotiation process in which all the actors come together on a democratic ground. In this way, it will be possible to access innovation of coherent policies and ownership of these policies by larger sides. Even if the most meaningful climate policies are innovated, as Marks (2010) stated, practice could be unsuccessful when a policy making process in which all the relevant stakeholders are not included. At the national level, climate change as a global problem needs global solutions and so, as stated by Kulözü (2017), it has critical importance to develop multifaceted negotiation opportunities. From this point of view, in order to reach a global solution for the problem an effective mode of governance at not only the global level but also at the national and local levels should be reached.

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