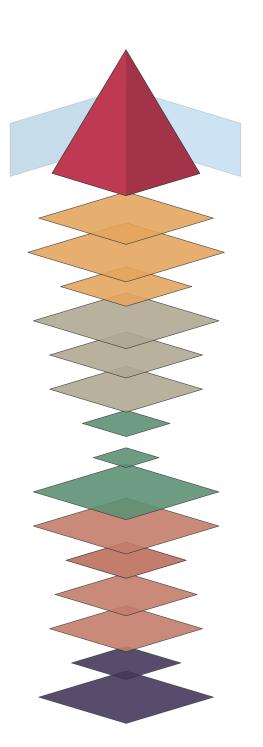




## 



### 7.03 **CRIMINALITY SCORE**

14<sup>th</sup> of 193 countries
6<sup>th</sup> of 46 Asian countries
4<sup>th</sup> of 14 Western Asian countries





CRIMINAL ACTORS	7.30
MAFIA-STYLE GROUPS	8.50
CRIMINAL NETWORKS	8.00
STATE-EMBEDDED ACTORS	9.00
FOREIGN ACTORS	6.00
PRIVATE SECTOR ACTORS	5.00





Funding provided by the United States Government.



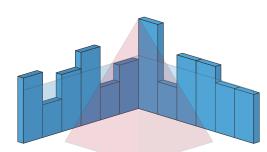


ENACT is funded by the European Union and implemented by the Institute for Security Studies and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.









### 3.38 Resilience score

153rd of 193 countries
37th of 46 Asian countries
10th of 14 Western Asian countries

POLITICAL LEADERSHIP AND GOVERNANCE	4.00
GOVERNMENT TRANSPARENCY AND	2.00
INTERNATIONAL COOPERATION	3.50
NATIONAL POLICIES AND LAWS	4.50
JUDICIAL SYSTEM AND DETENTION	2.00
LAW ENFORCEMENT	3.00
TERRITORIAL INTEGRITY	5.50
ANTI-MONEY LAUNDERING	2.00
ECONOMIC REGULATORY CAPACITY	4.00
VICTIM AND WITNESS SUPPORT	4.00
PREVENTION	3.00
NON-STATE ACTORS	3.00

	7.03 criminality score	
$\stackrel{\bigwedge}{\longleftrightarrow}$	CRIMINAL MARKETS	6.77
$\bigwedge$	CRIMINAL ACTORS	7.30



Funding provided by the United States Government.





ENACT is funded by the European Union and implemented by the Institute for Security Studies and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.

# CRIMINALITY

## **CRIMINAL MARKETS**

#### PEOPLE

Turkey's geographic location at the crossroads between Asia, the Middle East and Europe, combined with its long borders, makes it a prime transit and destination country for human trafficking and human smuggling. Human trafficking is becoming increasingly pervasive in Turkey, especially in the form of sexual exploitation and forced labour. Human trafficking is concentrated largely in tourist areas, metropolitan cities and border cities. As Turkey continues to host a large refugee population, traffickers are taking advantage of the vulnerability of such communities by pressuring women and children into being trafficked for sexual exploitation. Forced marriages of young girls through unofficial religious ceremonies have been increasing as an economic coping mechanism. Organ-trafficking networks have also been exploiting vulnerable communities, particularly refugees facing financial difficulties. In addition to the criminal networks. state-embedded actors are also involved in or at least facilitate human trafficking.

Turkey continues to be a key transit state for migrant smuggling towards Europe from countries such as Syria and Afghanistan. Smuggling from the latter has increased in recent years due to the takeover of the country by the Taliban. There has also been an increase in irregular migrants coming from African countries, which is facilitated by Turkey's lenient visa requirements and good airport links to enter the country. Criminal networks active in the humansmuggling market are loosely connected and independent networks that cooperate with each other on a short-term basis where necessary. Networks facilitate the smuggling of refugees and other migrants via the falsification of documents and the subsequent transportation of these individuals. Similar to human trafficking, human smuggling is also facilitated by corrupt government officials. Reports allege direct involvement of state-embedded actors and legitimate businesses in this market.

Most extortion cases involve either individuals or smallscale criminal networks, working in specific areas of bigger cities in Turkey, that target small businesses or individuals to obtain money by using illegal firearms or other offensive weapons. Criminal networks created by migrant groups are also reported to be involved in this market. Racketeering is mostly carried out by mafia-style organizations working in specific areas claimed by them, which then threaten small shops in order to force them to make regular payments.

#### TRADE

The arms-trafficking market in Turkey continues to be fairly prominent, with the country serving simultaneously as a source, transit and destination country to greater or lesser degrees. The players involved in the illegal-arms market can be classified broadly under three main types. First, there are criminal networks that supply handguns and shotguns to neighbouring Iraq, Syria and Iran, and across the world. Second, there is a much more sophisticated arms-trafficking coalition that works illicitly to supply more advanced and profitable weapons. Finally, state-embedded individuals as well as private-sector actors who are known to have close ties with the government are thought to be involved in illegally transferring weapons to groups fighting in Syria and Libya. The arms-trafficking market, therefore, is allegedly instrumental for the Turkish state's external political objectives. There are also reports revealing Turkey's role in the illegal trafficking of firearms through Bulgaria to the market in Europe.

Trade in counterfeit goods, especially textiles, luxury goods, cosmetics, pharmaceutical items and electronics in Turkey is common, and the products are easily accessible through online and offline platforms despite relevant regulations and law enforcement efforts in place. Due to the prevalence of counterfeit goods in the country, counterfeiting is usually perceived by Turkish citizens as a minor offence without a victim, and acceptable. Although there are no reports regarding the involvement of organized criminal groups in the counterfeiting market in Turkey, bribery of customs and law enforcement officials is a common occurrence. Private-sector actors, such as legitimate textile companies and freight companies, are also reported to be involved in this market. Trade in counterfeit goods manufactured in Turkey is not limited to the domestic market, as the country has been defined as the third-biggest origin country of counterfeit goods following China and Hong Kong.

The illicit trade of excise goods such as tobacco and alcohol is common and such goods are easily accessible in Turkey, and equally not perceived as a major crime by many Turkish citizens. Heavy taxation of excise goods and recent skyrocketing prices, coupled with unemployment and poverty in border regions, have been fuelling both the demand and supply of such goods, making the practice mainstream. Cigarette smuggling in Turkey provides a lucrative funding source for terrorist organizations and criminal groups, and causes a serious loss of tax revenue for the government. Criminal groups involved in this market possess the same characteristics as criminal networks with hierarchical structures. There is also heavy involvement of corrupt state-embedded actors in this criminal market. There are several routes used for the smuggling of excise goods in the country, with the main ones being through



eastern and south-eastern Anatolia, where tobacco products especially are being smuggled from Iran, Iraq and Syria. Smuggling by means of maritime transportation is also common in both the Black Sea and Mediterranean regions.

#### **ENVIRONMENT**

One of the most severe forms of environmental degradation in Turkey, the intentional burning of forests to open the way for commercial developments, continues to be a regular occurrence in coastal areas. It is a phenomenon in which government corruption and political interests are key factors. Certain wildfires that occurred in the eastern region of Turkey have been also linked to the terrorist group Kurdistan Workers' Party (PKK). Turkey is also increasingly being considered a hub for the smuggling of illegal wood sourced from various regions of the world. Although there is insufficient data on these illicit activities, there are indications that Turkey is now serving as a transit point for the trade of teak from Myanmar, in order to evade sanctions imposed by the US and the EU. With regard to fauna crimes, seizures of traditionally trafficked illegal wildlife such as pangolins and products such as rhino horn suggest that, largely as a result of the country's location and status as a global transport hub, Turkey plays an important role in the transnational illegal wildlife trade. Domestically, however, fauna crimes are not particularly pervasive, although the number of illegal wild animals confiscated demonstrates the increasing demand for exotic animals in Turkey.

The illicit trade in non-renewable resources continues to be a critical component of Turkey's illicit marketplace. Oil-related and gold-related crimes are the two most significant non-renewable-resource crimes in Turkey. Oil smuggling is one of the more profitable sources of income for organized-crime groups in Turkey, which exploit a demand for cheaper oil and the opportunity to earn tax revenue from the sale of smuggled oil sourced primarily from Syria, Iraq and Iran. With the ongoing currency crisis and increasing fuel prices, fuel smuggling continued to be one of the major smuggling crimes in Turkey, with seizures significantly increasing in recent years. There are several types of oil smuggling, with changing volumes and criminal actors involved. For instance, while small-volume oil smuggling mainly occurs in border cities with small criminal networks running primitive operations, medium-volume oil smuggling is typically carried out by transportation companies and oil stations where companies are allowed to stockpile. At each level of oil smuggling, corruption and state-embedded actors play a pivotal role. As for the illicit gold market, Turkey continues to work with Venezuela in the gold trade, despite the sanctions imposed.

#### DRUGS

Turkey has been a source, transit and destination country for the heroin trade, due to its geographic location on the Balkan trafficking route, where heroin originating from Afghanistan is imported into Western Europe. Turkish organised-crime gangs continue to maintain control over the wholesale importation of heroin into the continent, and historic records in heroin seizures have been attained in recent years. Moreover, acetic anhydride, a substance used in the manufacture of heroin, has continued to be smuggled into Turkey. This indicates increasing heroin production by laboratories scattered across the country. While terrorist organizations are reported to be closely related to drug trafficking on all levels, reports suggest the collusion as well as active involvement of state officials and politicians in all of the drug-trafficking markets. Although Turkey has not historically been on the transnational cocaine trafficking route, the increase in the amount of seized cocaine within the last couple of years is considered to be the result of a change in transportation routes due to the high numbers of seizures in America and Europe. Therefore, Turkey is becoming a more prominent transit country in cocaine trafficking targeted at south-eastern and Eastern Europe. Local criminal groups involved in the cocaine market are also known to cooperate with Hezbollah in Lebanon, the Sinaloa Cartel in Mexico and Sito Miñanco in Spain, as well as drug cartels in Colombia, Panama and Brazil.

Cannabis is the most commonly used substance within the Turkish community, with widespread cannabis cultivation concentrated predominantly in the south-eastern region of Turkey and controlled largely by the PKK and its associated groups. Despite local production mostly meeting local demand, cannabis is also trafficked into Turkey, primarily from neighbouring countries such as Iran, Iraq and Morocco, as well as Western Balkan countries. The prevalence of synthetic drugs, specifically methamphetamine, synthetic cannabinoids, Ecstasy (MDMA) and Captagon, continues to rise, which is largely caused by easy access and low prices. While there has been an increase in the production of methamphetamine in Turkey, which is indicated by high numbers of liquid methamphetamine and acetic anhydrite seizures, Turkey continues to be a transit country for synthetic-drug trafficking, specifically methamphetamine, Ecstasy and Captagon.

#### **CYBER-DEPENDENT CRIMES**

Although the country is vulnerable to cyber-dependent crimes due to the high dependency on information technologies in both the public and private sectors, cyber-dependent attacks have been decreasing in recent years as a result of measures taken by the government. Despite the regulations, heavy fines and protective measures put in place in recent years, major personal data leaks continue to occur in the country. Turkey is the target of regular malicious software attacks and experienced one of the biggest cryptocurrency



frauds in the history of blockchain in 2021, resulting in losses worth billions of US dollars.

#### **FINANCIAL CRIMES**

Financial crimes, especially financial fraud, embezzlement and tax evasion, are highly prevalent in Turkey, with methods changing according to developing technology and financial instruments. Most of the large-scale incidents of financial fraud and embezzlement were carried out by well-equipped criminal organizations using communication technologies. The most common version of financial fraud is fraudulent calls made by criminal organizations introducing themselves as state officials and asking their victims to transfer certain payments. Other common forms of financial crimes include Ponzi schemes, banking fraud schemes through transferring phone numbers or the use of counterfeit devices attached to ATMs. While financial fraud and embezzlement activities require a lot of organization, networking and know-how, tax evasion is a criminal activity regularly carried out by individuals or small or medium-sized companies. Moreover, corruption and embezzlement of public funds with the collaboration of corrupt officials, bureaucrats and private-sector actors with close linkages to the government are also reported to be commonplace in the country.

## **CRIMINAL ACTORS**

Organized crime and state-embedded individuals have strong and complex links, dating back many decades. The Turkish government is often accused of leveraging certain criminal markets, such as the gold and oil trade, human smuggling and arms trafficking, for its own benefit and political purposes. Depending on the political circumstances and geopolitical relations with other countries, the Turkish government is reported to choose to either tighten or ease its control of organized criminal activity. Despite serious corruption allegations regarding government contracts or the involvement of state officials in criminal activities, judicial action or investigations rarely, if ever, take place. In addition to the political elite, law enforcement officials and customs officials are also believed to be involved in most of the above-mentioned criminal markets. There are a significant number of mafia-style groups operating in Turkey, modelled on the traditional mafia system. Those that continue to exist in the country reportedly have developed close connections with the government and other politicians, making them immune to law enforcement or the judicial system, until they fall out of favour due to their actions. The PKK also has a long history of involvement in drug trafficking, and although it is a separatist militant group, it can be thought to operate as a mafia-style group with respect to its organized-crime activity.

A large number of loose criminal networks are active in certain parts of Turkey. These networks engage in a range of cross-border smuggling activities, ranging from trafficking narcotics to smuggling migrants. The capacity and influence of these criminal networks have increased in recent years, as have their links with criminal networks in neighbouring countries and beyond. With the growth and increasing diversity of illicit economies in Turkey, ad hoc networks are far more influential and more reflective of the nature of both licit and illicit trade than mafia-style groups. Similar to mafia-style groups, criminal networks also operate in security vacuums facilitated by endemic corruption.

Although organized crime in Turkey is dominated by domestic criminal individuals, foreign criminals also operate in the country, primarily in cross-border smuggling that includes migrants, drugs and weapons, as well as human trafficking. As such, their areas of operation are concentrated at the country's land borders and there is strong collaboration between these foreign and domestic organized criminals. Foreign mafia groups and illegally armed groups, including terrorist groups that engage in organized criminal activity, are becoming increasingly visible in Turkey, exacerbated by the spillover effects of the conflict in neighbouring countries, which have begun to dominate trafficking and smuggling activities in Turkey.

Many criminal networks and state-embedded actors involved in the above-mentioned criminal markets own legitimate companies with the aim to launder the profits gained from these illicit activities and to cover their criminal activities. Some legitimate private-sector actors are also reportedly involved in certain criminal activities due to the possibility of quick and high profits.



## RESILIENCE

#### LEADERSHIP AND GOVERNANCE

Although combating organized crime has been an important aspect of the government's policy in recent years, with several operations targeting illicit substance trafficking in particular, there is a general impression that enforcement is uneven in practice, with favouritism shown towards supporters of the ruling party and the president. Criminal scandals combined with a currency crisis have raised numerous questions in relation to the integrity of the government, affecting its popularity with the public. Recent allegations suggest a close connection between the government and organized-crime organizations active in Turkey. Government transparency and accountability is low, with the lack of transparency becoming more apparent following the financial crisis, which is ongoing. Concerns regarding back-door deals and the erosion of the central bank's independence have increased. Alleged corruption and nepotism, coupled with allegations of bribery in public tenders regarding major projects, continued to increase in recent years. The enforcement of anti-corruption laws continues to be inconsistent, and Turkey's anti-corruption agencies are generally ineffective, contributing to a culture of impunity.

Turkey appears to have strong bilateral and multilateral cooperation frameworks in place, including having ratified all relevant international treaties and conventions pertaining to organized crime, but these are largely a relic of the country's history as an ally of the Western world. Similarly, although extradition treaties are in place with a host of countries, there are serious concerns regarding the use of extradition processes and requests on the part of the Turkish government. Even though there has been an ongoing cooperation effort between international counterparts, it is also well known that for the last couple of years Turkey has submitted increasing numbers of requests for the issuance of red notices to INTERPOL, based on political reasons, to target journalists, activists and political opponents living abroad. Turkey selectively cooperates with international organized-crime investigations, mostly when the initiatives do not involve any political elites. Turkey has a robust antiorganized-crime legal framework, including legislation on most forms of organized crime. Increased efforts have been undertaken in recent years with regards to cybercrimes and financial crimes committed through electronic means. However, despite the strong presence of legislation pertaining to organized crime in Turkey, there is a major issue regarding the lack of enforcement of these laws.

#### **CRIMINAL JUSTICE AND SECURITY**

The systemic lack of independence of the judiciary and the political pressure on judges and prosecutors continues to cause problems in the judicial system. Judges and prosecutors are allegedly directed by politicians to control political dissent and prosecutors abstained from launching investigations that may implicate the government or the political elite. The problems around the independence of the judiciary are also caused by the existing structure of the selection process of the council of judges and prosecutors, and the lack of merit-based criteria for their recruitment and promotion. As for the penitentiary system, lengthy detention and pre-trial periods are increasingly common in Turkey, with severe overcrowding and poor prison conditions being major issues. While the judicial and detention systems are robust on paper, but their effectiveness is severely compromised by a lack of independence and the extraordinary degree of interference and control by the Turkish state.

Overall, law enforcement capacity to fight organized crime in Turkey continues to be fairly strong, with a welltrained and well-equipped police and border force, as well as increased numbers of special law-enforcement units focusing on organized crime. However, corrupt practices are commonplace in Turkey's already highly politicized law-enforcement system, and police brutality is common.

Turkey's extensive sea and land boundaries, combined with its position at the crossroads of Asia and Europe – located on the primary trafficking routes of a number of illicit economies – make control of the country's borders challenging. Turkey's ports are becoming more vulnerable, especially due to an increase in cocaine trafficking. A security wall was built along the border with neighbouring Syria, Iran and Iraq, with the aim to combat smuggling activities in the region.

#### ECONOMIC AND FINANCIAL ENVIRONMENT

Turkey continues to be a regional financial centre for countries in Central Asia, the Caucasus, the Middle East and Eastern Europe, and faces major money-laundering risks. Although significant improvements have been made to its anti-money laundering framework in recent years, a number of shortcomings remain with respect to issues such as the proceeds of crime confiscation, managing frozen assets and the lack of restrictions on entering the country with substantial sums of cash. Although the current framework is considered to be adequate, there is little evidence to suggest the tools at the Turkish government's disposal are being implemented successfully. Furthermore, the government's money-laundering investigative activity has been criticized for being overtly politicized. The



country's central bank suffers from lack of independence, and state-owned banks operate according to the political agenda of the government, leading to a loss in credibility both domestically and on the international stage.

#### **CIVIL SOCIETY AND SOCIAL PROTECTION**

Support for victims of human trafficking in Turkey continues to be moderately effective, although the need for increased capacity for supporting trafficking victims and an improvement in victim identification systems remains. Important steps have been taken to expand practices for the protection of victims' rights in judicial processes. Drug treatment programmes are also available in the country.

Non-state actors are increasingly targeted if they are viewed as political opponents. The government has shut down several civil society organizations under the pretence of national security and terrorism concerns. The lack of media pluralism continues to be problematic, with most of the national media being controlled by the government, and investigative journalists facing lawsuits and detention.

This summary was funded in part by a grant from the United States Department of State. The opinions, findings and conclusions stated herein are those of the authors and do not necessarily reflect those of the United States Department of State.

