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File open

**Presumed degradation of nesting beaches in
Fethiye, Patara and Akgol (Turkey)**

**- COMPLAINANT'S COMMENTS AND PROPOSALS FOR
AMENDMENTS TO THE DRAFT RECOMMENDATIONS –**

*Document prepared by
MEDASSET - the Mediterranean Association to Save the Sea Turtles*

COMMENTS & PROPOSALS FOR AMENDMENTS

DRAFT RECOMMENDATIONS ON THE CONSERVATION OF LOGGERHEAD SEA TURTLE (*CARETTA CARETTA*) NESTING BEACHES IN FETHIYE & PATARA SPAS, TURKEY

- 6 November 2015 -

*Document presented by
MEDASSET - the Mediterranean Association to Save the Sea Turtles*

for the 35th Standing Committee Meeting of the Contracting Parties to the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)

1. Draft Recommendation on the conservation of *Caretta caretta* and its habitat at Patara nesting beach (Turkey) - T-PVS(2015)22E

The expert report on the on-the-spot appraisal echoes MEDASSET's reports on current threats to Patara Specially Protected Area (SPA). As stated by the expert, though the nesting beach is relatively pristine, there are some human pressures and negative developments affecting the beach currently; however, the greatest threat is the inadequate management of the site, especially in light of the ongoing large-scale summer house development. We note that the evaluation of the overall impact of the development project on the entire protected area is not addressed, as it is outside the expert's terms of reference ("evaluation of the project as regards the nesting activity and the nesting beach"). In addition to the beach, the protected area includes wetlands, rivers, forest, dunes, and a unique archaeological site of global heritage importance. In our view the development once completed will greatly increase the built-up area, reduce the natural habitat and its pristine status, and have negative impacts on cultural, archaeological, aesthetic elements and landscape of the SPA.

Taking into account the current inadequate management of the site, the ongoing development of 300 summer houses and the precautionary principle, urgent action by the authorities is needed in order to maintain the relatively pristine status of the site and prevent irreversible degradation.

The unique combination of a world heritage site, important habitats and rich biodiversity, merits continued monitoring by the Standing Committee, through Recommendations, that since 1988 have contributed to the current relatively pristine status of the site.

Therefore, we strongly urge the Standing Committee to adopt the Recommendation together with the proposed amendments, with the view of encouraging and assisting Turkish authorities to improve management and conserve the site against human pressures and illegal or unsustainable development.

We welcome the draft Recommendation and wish to make clarifying comments and additions (see T-PVS/File 2015 34 for further details on the points raised below). We hereby submit proposed amendments with the aim to a) clarify or improve measures for effective implementation and easier monitoring of progress in the long-run b) add solutions to problems that could not have been identified by the expert due to the short timeframe of the appraisal (1 day; 1 night not covering all beaches), based on MEDASSET's monitoring of the site since 1988 and following consultation with local stakeholders and experts.

PROPOSED AMENDMENTS

PREAMBLE:

Par. 6: *Noting that the loggerhead turtle is a strictly protected species listed in Appendix II to the Convention and ~~classified as endangered by~~ is included in the IUCN Red List of Threatened Species, mainly as a result of degradation of ~~their~~ nesting areas;*

Reasoning: To ensure text remains up to date regardless of changes to the classification of the species on the IUCN Red List.

Par. 14: *Considering the unique ecological heritage value of the Patara beach as one of the fourth most important Caretta caretta nesting sites in Turkey (Baran and Kasperek, 1989) and the most important and largest dune system on the Turkish Mediterranean coast;*

Reasoning: The beach ranking statement should be kept general as ranking changes over time as long-term data becomes available from Patara and the other Turkish beaches (e.g. ranked 5th in Baran & Kasperek, 1989, 11th in Turkozan *et al.* 2003 and Canbolat 2003, 10th in Turkozan & Kaska 2010, 7th in Olgun *et al.* in press). We also suggest an addition regarding the dunes as the recommended measures also apply to the unique dune system of Patara beach. The dunes are a key element of the SPA, are the largest and most pristine systems on the Turkish Mediterranean coast (Avcı *et al.* 2015, Turkozan & Kaska 2010) and merit mention as a protected ecosystem which is disappearing in the Mediterranean due to coastal development (2012 IUCN report, Eds. de la Vega *et al.*). The dune system expands behind the nesting zone, and hence was not the prime focus of the expert report. However, regulation of activities and action to protect and restore the dunes is needed, e.g. against further developments such as roads or beach bars that lead to dune flattening. This also ensures consistency with Recommendation No. 54 (1996) which includes reference to the dunes.

New Paragraph: *Noting the future increase of residents and visitors following completion of the ongoing large scale summer house development inside the SPA.*

Reasoning: It is fundamental to refer to the large scale summer house development (17 completed and dozens of foundations laid in the SPA's 3rd Degree Archaeological Area). Together with the current lack of management, we consider the large scale development as a key factor leading to the Recommendation. The increase of human pressures due to the approx. 120% increase of the summer population is expected to degrade the protected area and the nesting beach, especially if management remains inadequate. Lastly, the independent expert's report identifies the development as a key cause of potential future problems and one of the reasons that require the recommended measures ("The increasing use of the beach by humans, also as a consequence of urban development in the area (eg, the 415 planned summer houses; Fig. 14), represents an important potential threat [...] Pressure for such [beach] developments are expected in the future due to the 415 new houses and to more visitors from other areas attracted by the natural beauty of the site.")

MEASURES

No. 1. *Urgently ensure that Patara nesting beach receives appropriate legal protection and management, in line with its exceptional historical, natural and ecological value;*

Reasoning: Improved management of the site is a key measure needed, as noted in the expert's report. Though appropriate legal protection may indirectly help solve the management problem due to institutional implications, management measures merit special reference throughout the Recommendation. The outstanding world heritage and cultural value of Patara's archaeological site (UNESCO World Heritage Centre 2015- Ref: 5408 Tentative List), which is an integral part of the SPA and is linked to the dunes and nesting beach, could be noted here.

No. 2. *Urgently set up, enforce and monitor the implementation of strict regulations which: (i) prohibit further development on the beach (including buildings, structures, roads) and remove abandoned illegal facilities and restore dunes, During the nesting/hatching season:*

- (ii) regulate the extent and use of furniture on the beach and ensure furniture is removed from the nesting zone at night*
- (iii) prohibit access of vehicles by placing barriers at ~~the~~ all beach's entrances,*
- (iv) prohibit illumination of the beach,*
- (v) prohibit fishing in front of the beach during the nesting and hatching periods,*
- (vi) prohibit camping on the beach and on riversides in view of the beach,*
- (vii) prohibit horse riding and 4x4 or quad safaris on the beach,*
- (viii) define fines for noncompliance with above regulations*

Reasoning: (i) Abandoned facilities of an illegal bar on the sand dune were documented during the on-the-spot appraisal and the expert report recommends that “*the structure needs to be removed before its pieces disperse on the beach.*” (ii) Beach furniture is currently not removed/stacked at night (noted by the expert and observed during the on-the-spot appraisal, and documented in MEDASSET reports and Turkish monitoring project reports). (iii) Barriers are needed at all (5) beach entrances. (vi) Camping was observed during the on-the-spot appraisal on the river banks in view of the beach and has been documented in all MEDASSET Reports. (vii) Quads were documented on the north beach during the on-the-spot appraisal and enforcement of the existing ban on horse riding during the nesting season should be reiterated. (viii) Preventative fines should be defined, as suggested by one of the IUCN observers (T-PVS/Files 2015 43). Lastly, we moved the phrase “During the nesting/hatching season:” as it applies to all measures.

No. 6. Urgently set up long-term conservation and research programmes, entrusted to a permanent team that should be granted adequate man power to monitor the entire beach (north and south) during the entire nesting/hatching season and protect all nests if necessary;

Reasoning: The brackets are needed to clarify that there are two beach sections so as to ensure that the monitoring teams are allocated resources to monitor also the north beach, beyond the Esen river. It is important that the programmes are designed and resources allocated for monitoring throughout the nesting and hatching season.

No. 7. Improve information to and awareness of tourists about sea turtle nesting and on correct behaviour for the sustainable use of the beach; install clearer signage to indicate the nesting zone

Reasoning: The current signage of the nesting zone where beach furniture use is not permitted is not sufficiently obvious in the main entrance of the beach and is inexistent in the rest of the 12km beach

New, e.g. after No.2:

Ensure that adequate financial and human resources are allocated for the control, management and enforcement of regulations

Reasoning: Currently there are no rangers or guards with enforcement power in the protected area and this is the root cause of the complete “lack of control” stated in the expert report (“Current management”). In addition, this measure shall ensure that measure No.2 on regulations is implemented. Lastly, the proposed measure is included in the Recommendation for Fethiye SPA (Measure No. 12, T-PVS 2015 29) and should also be added here.

New, e.g. after No. 3:

Ensure that litter is periodically removed from the beach and dunes, and collaborate with the agricultural community to tackle the disposal of waste in rivers, as this is washed onto the beach and into the sea.

Reasoning: Garbage is left behind by beach users and agricultural and urban waste is transported by the Esen river onto the beach and into the sea. The expert’s report notes this, and the problem has been fully documented in MEDASSET reports and the Turkish monitoring project reports(e.g. Olgun *et al.* 2012). Beach litter is a threat to hatchlings and to foraging sea turtles (Triessnig *et al.* 2012,

Schuyler *et al.* 2013, Tomas *et al.* 2002, Lazar & Gračan 2011) and an environmental problem that is unsuitable for a protected area and should be tackled by management authorities.

TYPOGRAPHIC CORRECTIONS:

Preamble Par.15: *Recognising that the Government of Turkey has taken - in the past ~~positive~~ - some positive steps to successfully protect i....*

Measure No. 5. *Ensure the proper fencing of all nests in areas with high human presence during the day, so as to protect them from ~~walking-people-trampling~~ and from beach furniture;*

2. Draft Recommendation on the conservation, management, and restoration of Fethiye nesting beaches (Turkey) - T-PVS(2015)29

The section is endorsed and co-signed by the "Karaot Solidarity" civil local society group and a statement by the group is annexed to the document.

We welcome the independent expert's report, which allows for the triggering of the strongest mechanism available to the Bern Convention, i.e. an extensive and ambitious Recommendation. The expert's statement "the bad status...is so obvious that the only possible conclusion is that sea turtle conservation was not considered as a priority..." touches on the core problem in Fethiye SPA and the issue where emphasis needs to be applied. This should be reflected in the Recommendation by placing emphasis on decision-makers and managers, rather than on tasks to be carried out by conservationists/biologists.

As reported in MEDASSET's 2015 report, the few positive steps that were taken few days prior to the on-the-spot appraisal, due to the authorities' intervention, were reverted shortly after (e.g. beach furniture and permanent structures in core nesting zone, light pollution, etc). In conclusion, since the complaint was submitted in 2009 and the case file was opened in 2013, it is clear that management measures are not being applied in Fethiye SPA in order to sufficiently protect sea turtles and their habitats. In fact the last remaining pristine areas are being destroyed, year by year, in disregard of existing Recommendations.

We urge the Standing Committee to adopt the Recommendation together with the proposed amendments, with the aim to reinforce political will for the preservation of the site and encourage strengthening of management of this important protected area and sea turtle nesting habitat, to the benefit of local biodiversity, sustainable tourism and livelihoods. For too long, unsustainable coastal development has continued, uncontrolled, and in disregard of the protected status of Fethiye's biodiversity. **The Recommendation should be urgently applied by the responsible authorities in collaboration with all stakeholders.**

We hereby submit proposed amendments with the aim to a) clarify or improve the measures in order to ensure effective implementation, avoid confusion and make monitoring of progress clearer and simpler in the long-run b) add solutions to problems that could not have been identified by the expert due to the short timeframe of the appraisal (2 days, 1 night), based on MEDASSET's monitoring of the site since 2008 and following consultation with local stakeholders and experts (see T-PVS/File 2015 34 for further details on the issues raised).

PROPOSED AMENDMENTS

PREAMBLE:

Par. 6: *Noting that the loggerhead turtle is a strictly protected species listed in Appendix II to the Convention and ~~classified as endangered by~~ is included in the IUCN Red List of Threatened Species, mainly as a result of degradation of ~~their~~ nesting areas;*

Reasoning: To ensure text remains up to date regardless of changes to the classification of the species on the IUCN Red List.

MEASURES

No. 1. Stop any further development of permanent structures (buildings, roads, shipyard, jetties/docks etc.) along the entire coast of the nesting site complex, in order not to reduce further the nesting habitat.

Reasoning: New resorts or hotel complexes are allowed to place private docks on the nesting beaches, that further increase maritime traffic, permanently affect nesting directly behind the dock, and are occasionally illuminated due to lack of regulation enforcement (see MEDASSET reports and IUCN Observer report T-PVS/Files 2015 43). There are already 5 docks (1 constructed in 2015) and we strongly recommend that no further docks are allowed.

No. 2. Along the entire coast, remove any structure (wooden paths, wooden pavilions, bars, platforms, showers, carpets, patios, etc.) from the nesting zone and former or current sand zones, especially in areas with relatively narrow beach width and/or in tracts with narrow sandy strips especially in the southern part; and restore the sandy areas;

Reasoning: Clarifying the measure's scope and applying it to the entire nesting beach complex, in both the nesting zone and the former and current sandy zones, is critical for the successful implementation of the Recommendation. Permanent structures have been installed in the middle of the nesting zone at all beaches (e.g. in Akgöl and Calis Section B), as well as on the formerly sandy zones at the top of the beaches (Yaniklar, Karatas, Calis Section B and A), which used to be part of the nesting zone but have since been transformed into gardens, bar facilities, etc. In addition to noting the relatively narrow beach tracts, there are narrow sandy strips in wide beach sections that are used for nesting and should be kept clear. In addition, reference to "southern part" is vague so we suggest that the statement is kept general as there are narrow stretches in all beaches (Yaniklar, Karatas, Calis Section B and A). We add "carpets" and cement "patios" as these form permanent obstacles to nesting that need to be removed. Lastly, restoration of the sand zone should follow removal of structures.

No. 5. Map the whole Fethiye coast using long-term data, maps and imagery, to identify the past, current and potential most suitable zones for sea turtle nesting, and set a maximum percentage limit of sandy tracts where ~~to allow~~ touristic structures are allowed on the nesting beach and define (A) coastal tracts less suitable for turtle nesting, where beach furniture is allowed at appropriate densities and (B) coastal tracts adequate for turtle nesting, where beach furniture and access at night are not allowed. Enforce beach furniture removal/stacking at night along the entire nesting beach complex during the nesting/hatching season;

Reasoning: Adding the use of long-term nesting data, imagery and land maps to define the nesting zone and no-use zones is extremely important (i.e. at least 10-15 years of data). Figure 1 demonstrates the striking anthropogenic transformation of the sandy areas since 2003 in one of the beach sections. Defining zones and use rules based only on the current sandy zones or based on very recent data will in fact formalise the occupation of the former sandy zones and their transformation into bars, huts, patios, gardens, etc, that has led to the current beach degradation and decrease of available nesting space. Moreover, it is important that permitted beach furniture is appropriately designed in terms of density and location. Lastly, removal/stacking of sunbeds at night is a key problem in the SPA; to date, sunbeds are not removed at night on 6.5 km of 8 km of the nesting beach zone, as was observed during the on-the-spot appraisal (see MEDASSET report for photographs)

No. 6. Prohibit the use of beach furniture and other structures or facilities anthropogenic material on the sandy zones of Akgöl beach, prohibit use of the core nesting area in the sandy northern end of the beach, and carry-out the necessary controls to check enforcement;

Reasoning: If enforcement and control (daily patrols, signs, zoning, etc) is indeed implemented, the entire beach does not need to be kept off limits for beach users. At the start and end of the beach there is a sandy area where nests are laid, however, there is a pebbly zone in the middle of the beach that visitors could be allowed to use during the day. The northernmost end of the beach (before and after the stream) should be completely cordoned off as the entire depth of the sandy section is used for dense nesting. The sandy area at the beginning of the beach (south end)

should be kept furniture-free. Measure No.1 should of course be applied in Karaot/Agkol and structures along the coast should not be allowed (buildings roads, shipyard, etc).

No. 7. Reduce light pollution to a minimum along the whole coast: (i) remove all lights not strictly necessary, (ii) reduce the number of lights allowed for each business company, (iii) all lights considered as strictly necessary should be reduced in power and (iv) be red or orange-yellow, (v) all lights should be shaded in the direction of the beach. Further reduce lights after a certain time in the night, for not less than 50% of the dark time. Where possible, reduce height of lights, use motion sensors and native bushes/plants as light buffers on roads and properties; prohibit light show equipment use during nesting/hatching season.

Reasoning: We suggest 3 additional cost-efficient light reductions measures (for more details see MEDASSET reports, IUCN observer report T-PVS/Files 2015 42, Witherington & Martin 2000). The use of bushes as light buffers in sections already lined by promenades and roads should be used only if adequate water and root insulation is used. Light show equipment, used by at least one beach bar in Calis beach, should be banned during the nesting/hatching season.

No. 8. Build permanent barriers (not ditches) on the roads to prevent vehicles ~~to~~ from accessing the beach, designate parking spaces and official picnic areas away from the beach;

Reasoning: Ditches accumulate rubbish and are a trap for turtles (and humans). MEDASSET's reports have repeatedly advised against this technique; however this measure was used by authorities to prevent vehicle access in Calis a few days before the on-the-spot appraisal and the expert report notes that "It is questionable if such a measure can really be effective in the long term"; hence, we suggested the addition "(not ditches)". Moreover, parking spaces and picnic areas, such as those in Calis beach, should be designated away from the beach as they amplify disturbances (vehicle access, illumination, human presence at night, etc; see MEDASSET reports and IUCN Observer report T-PVS/Files 2015 43).

No. 9. Regulate maritime traffic during the nesting/hatching season, by prohibiting any motorised traffic at appropriate distances near the coast, by setting speed limits and ~~by~~ foreseeing marked corridors for boats from the beach to open waters;

Reasoning: Speeding water sport vehicles, lack of corridors, and boats that speed across and near the coast to transfer tourists between hotels in Fethiye, can lead to turtle injury or deaths due to collision. The phrase, "near the coast" is vague and needs to be locally defined, so we suggest the addition of "at appropriate distances across" and "near". To our knowledge, the national Regulation No. 2009/10 on rules applying to sea turtle nesting beaches, prohibits marine traffic within 1 nautical mile of the coast and specifies a general 8mph speed. Former beach signs stated this, but the rules were not enforced.

No.10. Set up long-term research and conservation programs conducted by a same permanent team recruited on a long-term perspective. This team should have adequate manpower to monitor the entire beach and protect all nests if necessary during the entire nesting/hatching season. The team should also assess across the years and ~~with~~ using the same comparable methods: (i) the disorienting effects of photo-pollution on hatchlings, (ii) disturbance of nesting females, and (iii) predation of nests (or attempts);

Reasoning: Though resolved during the recent years, in the past the nest monitoring programme launched late in the season (see e.g. 2011-2012 MEDASSET report).

No. 12. Ensure that adequate financial and human resources are allocated to ~~both~~ the controls and the management and monitoring of the beaches;

Reasoning: The key problem in Fethiye is lack of action at the management level. We suggest that the emphasis is put on management and enforcement in the above measure: "monitoring" may be confused with research programmes run by biologists, and resource allocation for scientific monitoring is already stated in measure No. 10.

No. 13. Improve information to the *local community and* tourists about sea turtle nesting and sustainable use of the beach. This should include *effective communication of regulations (incl. regulations implementing the Recommendation) by the authorities to stakeholders and businesses, signs at all major beach entry points, and awareness campaigns aimed to the hosts guests of the big resorts, in collaboration with the owners and managers; Encourage beach hotels and businesses to support scientific teams;*

Reasoning: The local community is a key group using the beach (for recreation and income) and should be added as a target group for awareness raising. Communication of regulations and especially of those implementing the current Recommendation (especially Measure No. 1), is vital, and has been suggested by local stakeholders (see Annex), as there is very low awareness and hence non-compliance. In addition, signs at all major entry points are needed in order to improve awareness and compliance by beach users (currently signs communicating rules are insufficient in Calis Section B, Agkol and Yaniklar, and non-existent in Karatas, see MEDASSET report). Moreover, new hotels that are allowed to operate on the beach could be invited to facilitate (e.g. by designating a responsible contact point and by providing in-kind support) the scientific monitoring team, as their operation directly increases the team's workload – e.g. due to the new mega-resort, Karatas beach needs to be monitored daily since 2015, whereas in the past monitoring was periodical due to the much lower level of disturbances and threats.

New: Prohibit camping and bonfires and set appropriate time limits for the operation of beach bars at night during the nesting and hatching season.

Reasoning: Camping on the beach (which leads to human presence on the beach at night) is documented in all MEDASSET reports and was observed during the on-the-spot appraisal. In addition, beach bar operation at night should be restricted after a certain time at night as this is a key cause of light pollution and human presence on the beach, both identified as critical problems in the expert's report.

New: Define and enforce fines for noncompliance with above regulations

Reasoning: Deterrent fines or penalties should be defined and applied after warning, especially given the current uncontrolled and high anthropogenic disturbances, that are documented in the expert's report, despite existing general national regulations that apply to all Turkish nesting beaches.

New: Involve the local community in the protection and management of the protected area.

Reasoning: As per the Patara recommendation, involving the local community will lead to higher acceptance and ownership of the protected status of the area and increased compliance to the necessary regulations (if coupled with enforcement).

New: Take measures to clean the beach and empty appropriately located bins on a daily basis, and ensure sewage is not discharged into the sea.

Reasoning: Garbage is left behind by beach users as has been noted in all MEDASSET reports as well as in the Turkish nest monitoring project reports (see e.g. 2010-2013 project reports). Though not noted in the expert's report as a key problem, as most of the beaches were cleaned prior to the on-the-spot appraisal, this is a recurrent problem in Fethiye SPA. Beach litter is a threat to hatchlings and foraging sea turtles (Triessnig *et al.* 2012, Schuyler *et al.* 2013, Tomas *et al.* 2002, Lazar & Gracan 2011), and an environmental problem that is incompatible with the area's protected status that should be tackled by management authorities. Community-based beach clean-ups can be combined with awareness raising at the start of the nesting season and at the end of the hatching season. Daily litter collection could be combined with beach furniture collection/stacking at the end of the day. Rubbish collection should be done manually and not with heavy machinery (e.g. bulldozers). Illegal sewage discharge into the sea should be closely monitored as marine pollution is a key problem in Fethiye Bay (e.g. see Bann & Başak 2013 and MEDASSET reports reporting sewage problems in 2009 and 2015).

SUPPLEMENTARY INFORMATION

Fig. 1. Fethiye, SPA. Çalış. Section B. 2003 – 2013 satellite imagery comparison shows the continual coastal build-up, planting and occupation of the sandy area of the nesting beach. In most parts only the pebbly zone near the waterline is development-free.



ANNEX - Karaot Solidarity Statement On The Fethiye Recommendation

Karaot Solidarity is a local civil society volunteer group that was created to defend Karaot (also known as Akgöl) against a shipyard construction in the protected area.

COMMENTS & SUGGESTIONS

We, as Karaot Solidarity, may add the following comments and suggestions to the problems found and announced by MEDASSET :

- 1) Unfortunately, the local decision makers and operators are not aware of the importance or the fragility of the area. The supervision of the protected area is simply not enough. Because of this reason, we believe throughout all nesting and hatching season, periodical trainings about the importance of the area, regulations and practices must be held for the local businesses, residents, managers and so on by the team that will do the monitoring, and also the locals must be integrated into the field work in order to keep them more involved and informed about the issue.
- 2) In the Fethiye-Göcek SPA Environmental Zone Revision Plan (scaled 1/25.000) which was approved by Ministry of Environment and Urban Planning on the date 12.01.2015 (as far as we know which is also the latest- see Fig. A.), some of the nesting areas which are well-known and annually monitored (for example an area on Karaot Beach which is designated for the Shipyard and Tourism Facilities) are excluded from the sea turtle area of influence. We think these areas must be re-included in maps as nesting zones as soon as possible.
- 3) We think the coasts which are not active nesting areas for the moment due to lack of conservation efforts but previously or potentially were nesting areas must be researched and identified by the Ministry of Environment and Urban Planning.
- 4) We think the Ministry of Environment and Urban Planning must be clear about the subject that the nesting areas cannot be zoned for development, not only for a shipyard but also for any construction, and make a public announcement that any attempt will be denied in accordance with the international agreements which the Turkish Government has accepted to be a part of.

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Fig. A. In the Fethiye-Göcek SPA Environmental Zone Revision Plan (scaled 1/25.000, approved by the Ministry of Environment & Urban Planning on 12.01.2015) some nesting zones which are well-known and annually monitored, for example an area on Karaot/Agkol Beach, are not marked as a sea turtle habitat and are designated for shipyard and tourism development (see red arrow).

