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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
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Conservation of Marine Turtles in Kazanlı Beach (Türkiye)

- COMPLAINANT REPORT -

Document prepared by the NGO

Marine Turtle Conservation in the Mediterranean

FOLLOW-UP OF RECOMMENDATION NO. 95 (2002) ON THE CONSERVATION OF MARINE TURTLES IN KAZANLI BEACH (TURKEY)

31 July 2026

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

for the 46th Standing Committee Meeting of the Contracting Parties to the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)

MEDASSET hereby submits an update report to the 3rd Bureau Meeting of the Bern Convention (22-24 September 2026) on the conservation status of sea turtle nesting beaches in Kazanli, Turkey.

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SUMMARY

Kazanli beach is located in southern Turkey. It is one of the top three most important green turtle (*Chelonia mydas*) nesting beaches in the Mediterranean. Conservation problems regarding Kazanli, were first reported to the Bern Convention in 1999 and have since been discussed regularly at its annual Standing Committee Meetings. In 2000 and 2001, MEDASSET alerted about the release of toxic waste into the sea from the beachside Soda Chrome Factory and seawater sample analysis revealed chromium concentration 13.500 times higher than permitted levels. A case file was opened in 2000, followed by Recommendation No. 95 (2002) “on the conservation of marine turtles in Kazanli beach (Turkey)”.

In June 2026, MEDASSET conducted a site visit to Kazanli Specially Protected Area (SPA) to assess the management and conservation status of the nesting beach. The survey was funded by Aktionsgemeinschaft Artenschutz (AGA), www.aga-artenschutz.de.

Fieldwork was conducted over three days, covering both day and night hours. During the fieldwork, the current status of the issues identified in the previous report was examined in detail for this important nesting beach. Please note that a high nesting density of green sea turtles (*Chelonia mydas*) was recorded in the Kazanlı Specially Protected Area (SPA). A significant increase in the number of nests was observed, particularly in the K1 region. **However, severe plastic pollution was detected across the entire beach, while petroleum-based leaks and crystalized chromium waste discharges were encountered in the area where the Soda-Chrome Factory is located. Please view the separately submitted Videos by clicking on the link [KAZANLI VIDEOS 2026](#) !**

To summarize, significant and alarming issues, remain unresolved, posing a serious threat:

There is still insufficient action in relation to five measures that require continual implementation, resulting in widespread litter (Point 3), lack of nest monitoring (Point 5), lack of information (Point 7), and signs of agrochemical pollution (Point 14).

Six measures have not been implemented to date: Points 1, 4, 6, 10, 11, and 13.

Widespread plastic pollution was documented throughout the beach, while petroleum contamination and unauthorized waste discharges (white crystallized residue) were identified in the section near the Soda-Chromium factory. Please see photos and video submitted. No removal of the hazardous waste was documented, **presenting a serious threat to humans and animals alike**. In addition, of extreme concern is the direct discharge into the sea that has been detected and the presence of white crystal chrome residue on the beach. (Point 5).

Details about our summer 2026 survey findings, photographs and video are provided in our “Detailed Report” (Annex 1, 2 and 3).

To date, **Recommendation No. 95 (2002) has not been implemented!** Our detailed report underscores the pressing need for its full implementation. The issues identified over two decades ago remain unresolved, and no improvement can be reported regarding the condition of this critically important nesting beach.

It is of **urgent priority** that the Turkish authorities take immediate action to address the long-standing conservation and management challenges without further delay.

MEDASSET urges the Turkish authorities to:

- **Fully implement all outstanding measures** under Recommendation No. 95 (2002) without further delay.
- **Protect the Kazanlı nesting beaches** from any form of coastal development or construction.
- **Provide the requested information**—first sought in 2021—regarding:
 - o Official maps and technical details related to the *Kazanli Tourism Development Plan* and/or *Kazanli Beach Arrangement Project*;
 - o The designation of areas for “Sustainable Development and Controlled Usage”;
 - o The identification of “Nature Conservation” zones.

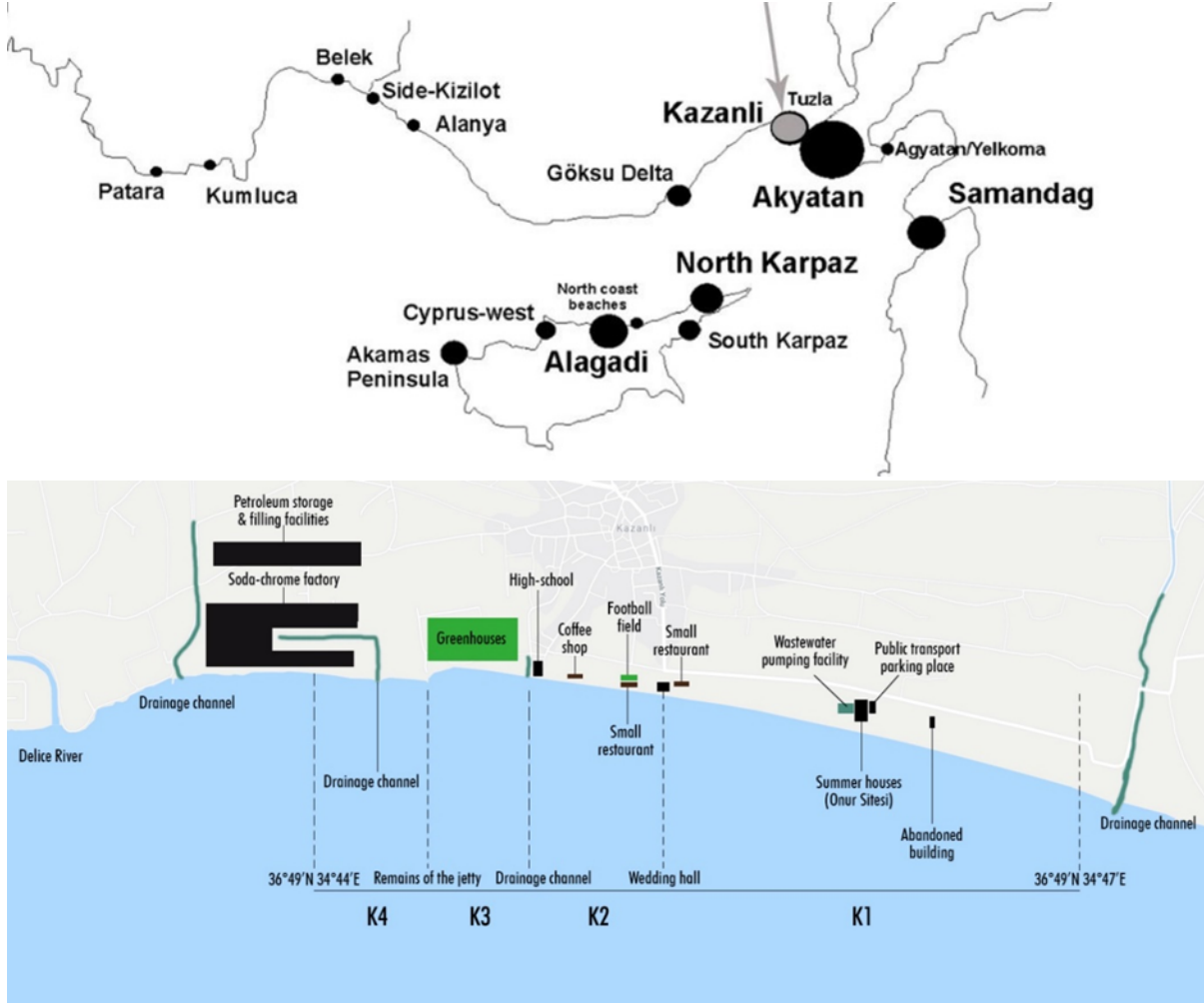
MEDASSET also calls upon the Bern Convention Standing Committee to:

- **Follow up on Recommendation No. 95 (2002)** at the **46th Meeting of the Standing Committee**.
- **Urge the Turkish authorities** to fully implement the Recommendation without further delay, and formally request the provision of the above-mentioned information.

ANNEX 1: DETAILED UPDATE, BACKGROUND SUMMARY, MAPS & PHOTOGRAPHS

KAZANLI, TÜRKİYE

In June 2026, MEDASSET conducted a site visit to Kazanlı Specially Protected Area (SPA) to assess the management and conservation status of the nesting beach. The survey was funded by Aktionsgemeinschaft Artenschutz (AGA), www.aga-artenschutz.de.



Fieldwork was conducted over three days, covering both day and night hours. The assessment was carried out on-site based on the statements of the advocating and complaining parties, and was documented in detail. The findings revealed that the activities carried out in the region do not constitute a systematic conservation effort compliant with established standards. Below, the survey findings regarding each measure under Recommendation No. 95 are presented.

During the fieldwork, the current status of the issues identified in the previous report was examined in detail. A high nesting density of green sea turtles (*Chelonia mydas*) was recorded in the Kazanlı Specially

Protected Area (SPA). A significant increase in the number of nests was observed, particularly in the K1 region, while a complete lack of nesting was observed in K3. Severe plastic pollution was detected across the entire beach, while petroleum-based leaks and illegal waste discharges were encountered in the area where the Soda-Chrome Factory is located.

The current issues identified on Kazanlı Beach are presented under the headings below.

1. Remove as a matter of urgency, the row of greenhouses closest to the sea in beach section K3; remove, as soon as feasible, other greenhouses in beach section K3 through the appropriate legal and administrative procedures and restore that space to favour turtle nesting:

No improvement has been observed regarding the issues associated with greenhouse structures identified in previous reports. On the contrary, serious concerns persist regarding the potential expansion of these greenhouse areas. In order to protect these structures from coastal flooding and dune movements, barriers consisting of large rocks have been constructed along the coast. In previous years, it was observed that humus-rich soil was added behind these barriers, raising concerns that this practice could pave the way for the further expansion of greenhouse areas in the future. Furthermore, plastic waste extending into the nesting zone was detected among these rock barriers (**Figure 1**).

It was recorded that the headlights of vehicles moving along the secondary road merging with the beach illuminate the coast directly, and that heavy noise and light pollution are generated due to the use of this area for socializing purposes at night. This situation is thought to cause sea turtles to avoid this region for nesting (**Figure 2**). Heavy rubble pollution was also observed in the study area.

2. Moving the taxi parking area away from the beach as a matter of urgency:

In many parts of Kazanlı Beach where access to the road is possible, trenches have been dug to close these areas to vehicular traffic. Vehicle intrusions were observed only in the K3 region, where the road merges with the beach (Figure: Yellow Dump Truck). It was determined that vehicles were parked very close to the beach in the parking lot of Onur Sitesi, as well as in the parking areas belonging to restaurant and cafe businesses, and the large parking lot located at the intersection of K1 and K2. The noise and light pollution generated by daytime vehicle activity is considered to cause scarcer nesting activity in these areas. (**Figure 3-4**).

Onur Sitesi is located in the K1 section of the beach, and active lighting is used in the housing estate's parking lot. Although the preference for amber tones in these lights is a positive practice, it is considered that light direction and shielding are not sufficiently implemented in these systems; therefore, their impact on the beach needs to be minimized. In the K2 section, it was detected that restaurant parking lots located close to the coast used high-intensity white-light spotlights. Although the primary purpose of these spotlights is parking lot illumination, no nesting was recorded in this area due to the intense light reflecting directly onto the beach (**Figure: 5**).

3. Periodically removing the plastic debris from the beach:

Severe pollution was observed across the entire beach, with the vast majority of this waste consisting of plastic debris (**Figure 6**). No regular cleaning efforts by the municipality, industrial facilities, or local communities were encountered. On the other hand, local rehabilitation and cleaning efforts were observed only in front of the restaurants.

4. Screening the lights of the municipality of Kazanlı and the Soda-Chromium factory so as to avoid photo-pollution on the beach:

In previous years, upon the application of a local non-governmental organization, the Mediterranean Third Eye Education and Youth Association, the municipality selected amber tones for the roadside lighting and ensured that these lights were directed so as not to affect the beach (**Figure 7**). On-site investigations revealed that these positive changes have been maintained.

On the other hand, the illumination from the Soda-Chrome Factory continues to affect the entire area (**Figure 8**), and it has been determined that it generates intense light pollution, particularly in the K3 region. Although the color tones of the street lighting in the school zone are appropriate, the positioning of some light fixtures needs to be adjusted and adequate shielding must be implemented.

It was determined that the lights of Denizkızı Restaurant, Sahil Balık Restaurant, and Cemre Kır Bahçesi, located in the K2 section of the beach, directly impact the coast. The illuminated seating areas of these establishments, which extend onto the beach, combined with their high-intensity light sources, cause severe light pollution. Conversely, the removal of the astroturf pitch (mini-football field) in the area was noted as a positive development (**Figure 5**).

Additionally, the headlights of vehicles brought by evening visitors to the beach, the light sources used by recreational anglers, and the illuminated seating areas on the beach stand out as other factors, and it has been observed that existing warning signs regarding light usage are insufficient (**Figure 4**).

5. Maintain monitoring of the chemical waste discharge into the sea by the chromium factory; establish a reliable and permanent monitoring of nesting activities in the beach and make an independent assessment of potential burden of the natural environment of Kazanlı, with substances released by the Soda-Chromium factory; assess the potential risk of effluents of the Soda-Chromium Factory to wildlife;

The Soda-Chrome Factory, located on the Kazanlı nesting beach and recognized as one of the largest industrial facilities in the region, operates under Kromsan within Şişecam. In Şişecam's 2023 Sustainability Report (https://sustainability.sisecam.com/sites/catalogs/en/Documents/Sise_cam-2023-Sustainability-Report.pdf), the "CareforNext 2030" sustainability targets were outlined. However, the report does not include any specific action plan or content regarding the conservation of sea turtles under the heading "Protect the Planet."

During on-site monitoring studies, significant sea turtle activity was observed on the beach directly in front of the Soda-Chrome Factory. Petroleum residues were encountered in several sections of the beach, and white crystallized waste scattered across the coast was also notable. In particular, when analyzing satellite imagery, leakages were detected in coastal areas corresponding to the alignment of the factory's waste ponds. This situation was thoroughly documented through both photograph and video records during the fieldwork (**Figure 9**).

Field observations further revealed that a Ministry personnel member was designated to conduct daily monitoring activities, while a researcher, operating under official Ministry authorization, was carrying out nest monitoring and controls (**Figure 10**).

6. Setting in place a monitoring of beach erosion, so as to take remedial measures as needed:

No systematic measures or mitigation efforts against coastal erosion were identified across the beach; however, protective rock barriers have been constructed in front of the school and the greenhouses. Since there is no natural dune structure in the K4 region, there are no concerns regarding erosion risks in this area. On the other hand, the K1 region stands out as the sub-section of the beach least exposed to the effects of erosion.

7. Promote public awareness on the presence and interest of marine turtle nesting in Kazanlı, addressed in particular to local population:

It was determined that the information signs installed at the beach entrances in previous years, as part of the voluntary activities of the Mediterranean Third Eye Education and Youth Association (a local non-governmental organization), have been removed, and no highly visible warning signs remain in the area. The sign located within the premises of Cemre Kır Bahçesi is practically unnoticeable (**Figure 11**). Although the local community is aware that sea turtles nest in the area, sufficient sensitivity and care regarding this matter are not exhibited.

8. Fully implementing the existing environment plan and assure the necessary financial and human resources to this end

The most recent Environmental Status Report published by the Mersin Provincial Directorate of the Ministry of Environment, Urbanization and Climate Change covers the year 2025. The report does not include any updated developments, data, or information regarding sea turtle nesting numbers or the conservation status of Kazanlı Beach.

9. Removing the illegal building in beach section K1

Last year, the abandoned structure in the K1 section was completely removed, and the construction site, including all rubble, was thoroughly cleared. This year, the access road leading to the structure has also been entirely closed, preventing entry to the beach from this specific area (**Figure 12**).

10. Removing as appropriate the hazardous waste accumulated over the years close to the beach as a result of industrial activities:

During the fieldwork, it was observed that the storage areas remained in their original locations, albeit with some additions and modifications. However, no definitive information could be obtained regarding the nature of the activities conducted in this area. Additionally, direct discharge into the sea was detected. Particularly during the on-site investigations, white crystals, estimated to be soda residues, were encountered at the leakage points on the beach, and a significant increase in the leakage volume compared to previous years was identified (**Figure 9 and 13**).

11. Considering the removal of the wedding hall of Kazanlı from the beach, to be relocated elsewhere:

The wedding hall building has been completely demolished, and its rubble has been entirely cleared. However, social events such as engagement ceremonies and weddings continue to be held at Cemre Kır Bahçesi and the surrounding restaurants.

12. Applying appropriate treatment to sewage waters from Kazanlı, so as to free the back of the beach from pollution:

Rainwater is discharged directly into the sea through concrete discharge channels and other drainage lines (**Figure 14**). According to the Mersin Provincial Marine Litter Action Plan (2025-2029) (<https://webdosya.csb.gov.tr/db/mersin/icerikler/mers-n-den-z-copler--il-eylem-plani-2025-2029-20250414132822.pdf>) :

- There are partial sewerage infrastructure deficiencies in the Kazanlı region,
- Although solid waste undergoes basic-level recycling, it still leads to beach and marine microplastic pollution.

In addition to coastal cleaning, various actions were planned to prevent cigarette butt pollution on beaches and to collect existing ones; however, it has been observed that none of these measures, including the items mentioned above, have yet been put into effect.

13. Looking for an appropriate solution to remove houses on the beach that were constructed legally

No change in status has been reported or documented since the 2022 report.

14. Reducing the impact of agrochemical products in the area around Kazanlı:

The population growth experienced in the region following the major earthquake in recent years has brought about an increased demand for food. This situation has driven the expansion of arable lands through agricultural subsidy programs, a process that is currently ongoing.

According to the Mersin Provincial Marine Litter Action Plan (2025-2029) (<https://webdosya.csb.gov.tr/db/mersin/icerikler/mers-n-den-z-copler--il-eylem-plani-2025-2029-20250414132822.pdf>):

- The D7, D8, and D9 drainage channels exert agricultural pollution pressure on the beach.
- There are plans to establish waste collection points along the coastline and to clean up accumulated marine litter on the shore.
- Partial sewerage infrastructure deficiencies persist in Kazanlı.
- Furthermore, within the boundaries of the Turan Emeksiz Forest on the Mediterranean coast—specifically along the shoreline between the Seyhan River (which empties into the sea at the Mersin-Adana provincial border to the east) and the Kazanlı settlement to the west—the establishment of the "Mersin-Tarsus Culture and Tourism Preservation and Development Zone" with a capacity of approximately 8,000 beds is planned.

15. Potential Predation Risk and Management Recommendations

Several stray dogs were observed in the area, moving in small groups. Although active field monitoring has not detected any direct harm to nesting sites or adult individuals so far, it is anticipated that these dogs may instinctively seek out easy food sources during periods of food scarcity. Therefore, to prevent any potential impact on adult sea turtles, nests, and hatchlings before a predation event occurs, it is of critical importance that local authorities relocate these stray dogs to animal shelters, thereby proactively mitigating this potential threat to the population (**Figure 15**).

FIGURES:



Figure 1. The rocky wall covered by plastic wastes. There are many nest and non nesting emergences in front of this wall (yellow arrows) (a) in July 2025; however, **no nesting occurred in June 2026 due to the pollution (b).**



Figure 2. It was observed that humus-rich soil (b) had been added behind these barriers in previous years, raising concerns that this may facilitate **further expansion** (a) of greenhouse operations in the future; furthermore, especially with the addition of the gate (yellow arrow), it reinforces the impression of a gradual encroachment.





Figure 3. Although trenches have been excavated to prevent vehicle access to the beach, the **extensive parking area in K2** remains positioned in close proximity to the shoreline.



a

b



Figure 4. **Light pollution and human activity** originating from nocturnal movement within the parking area, which is positioned close to the shoreline, directly impacting the beach. July 2025 (a) June 2026 (b)



Figure 5. **The removed (yellow oval) astroturf pitch and its spotlights**, alongside the artificial light sources of the commercial establishment that **continue to illuminate the shoreline**; additionally, the parking lot lighting of the Onur Site in July 2025 (a) and June 2026 (b).





Figure 6. The majority of the pollution consists of plastic waste



Figure 7. Street lamps maintain their position and color. July 2025 (a) and June 2026 (b).



Figure 8. **No improvement has yet been implemented in the lighting systems of the Kromsan factory** that impact the shoreline: July 2025 (a) and June 2026 (b).





Figure 9. Wastewater seepage originating from the Kromsan factory and the **chrome residual white crystallized substance left behind. See also videos in separate folder for better representation of the situation.**



Figure 10. Several sea turtle nests identified and documented along the shoreline during the fieldwork.



b



Figure 11. The signboard located within the boundaries of the Cemre Kır Bahçesi has become **virtually invisible and unnoticeable**: July 2025 (a) and June 2026 (b).



Figure 12. The access road leading to the abandoned construction site in the K1 zone (yellow arrow) has been closed off to prevent both vehicular and pedestrian entry (yellow oval): July 2025 (a) and June 2026 (b).



Figure 13. Operations and activities conducted within the **chrome waste** storage area.



Figure 14 The concrete canal next to the school and the barriers protecting the school from waves.



Figure 15. **Stray dogs** observed moving in a small group within the study area.

BACKGROUND SUMMARY

Green sea turtles, *Chelonia mydas*, are regarded as globally endangered.¹ In the Mediterranean, researchers estimate that there are only 784 green adult female turtles nesting in the region, laying about 1.164-2.674 nests per year.²

The beach of **Kazanlı** in southern Turkey is one of the most important green turtle nesting areas in the Mediterranean. In 1988, it boasted the highest density of green turtle nesting in the Mediterranean.³ More recently, it was listed as among the top three most important green turtle nesting beach in the Mediterranean, together with Akyatan and Samandag beaches. In 1988-2006, 43-403 nests/year were recorded and 176-562 nests/year in 2006-2011.⁴ Part of Kazanlı nesting beach is nationally designated as a 1st Degree Natural 'SIT' Protected Area. The total length of the beach is 4.5 km (see map at the end of this annex). Surveys in the 1980's identified a number of serious **threats**, which increased in subsequent years and although confirmed and reported by numerous researchers and conservationists, the responsible authorities failed to take action for several years. As a result, the nesting beach is subject to serious deterioration.

MEDASSET has been monitoring Kazanlı nesting beach and reporting on conservation problems since 1999. Main threats identified are: erosion, wastewater and toxic waste pollution, litter, sand extraction, light pollution, agriculture (greenhouses) on the rim of the nesting beach, coastal fishing during the nesting season, disturbance to the species during nesting and lack of public awareness. To the rear of the beach, sits the Kromsan Soda Chrome Factory that has deposited 1.5 million tons of hazardous toxic waste, directly next to the Kazanlı nesting beach. The waste has a high concentration of toxic chromium (Cr 3+/6+) compounds, and is a by-product of the factory's activities in the 1990s. This mountain of waste is covered with a plastic sheet (in reaction to Recommendation No 95), directly next to the Kazanlı nesting beach. The removal of this hazardous waste from the beach is of high priority for environmental and human health. In 2000 and 2001, MEDASSET alerted about the release of toxic waste into the sea off the nesting beach from the beachside factory. Seawater samples, which MEDASSET analysed, were found to contain chromium concentration 13,500 times higher than permitted levels. More than 23 green turtles were found dead. Discharges into the sea resulted in turtles emerging to nest with their body encrusted with white CaCO₃.

Bern Convention & the Kazanlı Case

The situation at Kazanlı has been reported several times in the Recommendations of the Bern Convention Standing Committee. In **1998** the Standing Committee adopted **Recommendation No. 66** *on the conservation status of some nesting beaches for marine turtles in Turkey*, and urged the Government of Turkey to "take urgent measures to restore the beach, remove the adjacent greenhouses and the solid waste, particularly plastics; and resolve the pollution problem from the soda chrome factory". To encourage conservation action, the Standing Committee opened a case file (No. 2000/1) at its 20th Meeting in **2000**. Further concerns about inadequate protection of the sea turtle population and discharge of toxic waste into the sea, finally led to an **on-the-spot appraisal mission in 2002**, following which the Standing Committee issued a specific **Recommendation No. 95 (2002)** *on the conservation of marine turtles in Kazanlı beach (Turkey)*, with 14 conservation measures. As some of the measures were implemented by the Turkish authorities, and considering that a better overall protection of the area had been achieved, despite MEDASSET's call to maintain the case file open, the Standing Committee at its 24th Meeting in **2004** provisionally closed the file, requesting that the Turkish Government continues to report on progress on the implementation of the 14 recommended conservation measures. However, the Turkish

¹ IUCN Red List of Threatened Species, www.iucnredlist.org

² Hochscheid et al. (2018). Sea Turtles in the Mediterranean Region: MTSG Annual Regional Report.

³ Baran & Kasperek 1989, Yerli & Demirayak 1996

⁴ Kasperek et al. 2001, Casale & Margaritoulis 2010, Turkozan *et al.* 2015

Government did not report on the conservation status of Kazanlı in 2005, and no delegation attended the **2005** Standing Committee Meeting. In **2006**, the Turkish Government submitted a brief report, but again did not send a delegate to the Standing Committee meeting. In **2007**, the issue was discussed at the Standing Committee, which decided not to re-open a file, but to request that the Turkish Authorities submit a report in 2008. At the **2008** Standing Committee Meeting, the Turkish Government reported on progress to implement measures listed under Recommendation No. 95 and further informed that the Soda Chrome Factory's plan to set up a landfill site had been delayed, and that the solid waste treatment would commence in July 2009, while the operation of the landfill was set to begin in November 2009. MEDASSET called on the Government of Turkey, to start implementing without delay plans to put the hazardous waste in a safe location, far from the green turtle nesting beach and the sea.

According to the March **2009** Bureau Meeting Report, the Turkish authorities reaffirmed their intention to remove the hazardous waste from Kazanlı Beach, but notified that "it would take some time". They confirmed that the construction of the waste neutralisation facility was underway and was expected to be completed as planned. EIA studies were being carried out for the waste storage site. According to the report submitted by the Government to the 2009 Standing Committee Meeting, the waste disposal facility was to be finished by October 2009. At the 2009 Meeting, the delegate of Turkey reported on progress on the implementation of Recommendation No. 95, and informed that the removal of the toxic waste was to start soon, an investment had been made to establish a neutralization plant, and that waste removal will take eight or ten years. MEDASSET welcomed progress made, and highlighted that together with the toxic waste management several points remain unsolved, such as the severe coastal erosion which requires more drastic measures by the authorities.

During the 30th Standing Committee Meeting in **2010**, though Kazanlı was not on the Meeting's agenda, and following MEDASSET's intervention, the Turkish delegate briefly informed that nest monitoring continued and that the toxic waste neutralisation facility was established within the chromium factory's grounds and that the process has started (see 2010 MEDASSET Announcement). Two hundred thousand tons of chromium had been neutralised and were kept within the Factory's grounds, until transferred to a landfill site, which had not yet been defined. MEDASSET called upon the Turkish Government to continue reporting regularly to the Convention on all issues concerning Kazanlı, especially on the toxic waste management and erosion problems. The request was reiterated via email to the Secretariat in **2011** and through an intervention during the **2012** Standing Committee. To our knowledge, no government report had been submitted since 2009.

At the **2013** Standing Committee Meeting, the Turkish delegate informed about measures, including: awareness raising targeted at visitors; local volunteer beach cleaning activities; light screening by the municipality; seasonal vehicular traffic bans; chemical analysis showing waste compounds from the chromium factory to be well below standard values. Illegal buildings and greenhouses remain on the beach. No information was provided on the remaining measures, such as the severe beach erosion problem. Information reported on the removal of the toxic waste was the same as reported in 2010, therefore, there seemed to be no tangible progress (for details see T- PVS/Files (2014) 58).

In **2014**, the Turkish delegate's oral statement at the Standing Committee Meeting addressed all measures under Recommendation No. 95. MEDASSET welcomed the continuation of awareness raising, nest monitoring, efforts to reduce agrochemical pollution, municipal sewage and industrial wastewater discharge monitoring. A single beach cleanup before the nesting season was reported. The report was unclear regarding whether light pollution reduction measures were indeed taken or if there were only discussions with the municipality and factory about this issue. The 1.5 million tons of solid toxic waste remain next to the nesting beach, there was no update on the amount of waste neutralised during 2011-2014 and the only positive news was that the permanent landfill for the neutralised waste should start to operate in 2015, as the EIA was completed in 2014. Regrettably, removal of greenhouses and illegal buildings had not progressed, pending an ongoing shoreline delimitation court process. Lastly, there was a complete lack of measures to monitor or manage erosion. As announced in the delegate's oral intervention,

in Dec. 2014 the Ministry made a study visit to ARCHELON (Athens, Greece) regarding the management of nesting sites. During the visit, MEDASSET participated in a discussion session on beach erosion and invited an expert geologist who, after noting the severe erosion in Kazanlı using satellite imagery, identified the river dams in the surrounding area as the possible key source (as has been suggested in MEDASSET's reports) and provided some general guidance on potential measures.

At the **2015** Standing Committee meeting, the Turkish delegate presented a report on the 14 points of Recommendation No. 95 (2002): preliminary work was underway regarding a beach erosion project and 46.593 tons of the neutralised chemical waste stored in a temporary landfill facility in the factory, had been transferred to a permanent landfill (for details see T- PVS/Files (2015) 49).

At the **2017** Standing Committee meeting, the Turkish delegate informed that the beach erosion project was not launched and no action has been taken to deal with the erosion problem, and that 183 thousand tons out of the 1.5 million tons (only 12.2%) of the neutralised chemical waste stored in the temporary facilities had been transferred to a permanent landfill. MEDASSET's survey and report confirmed that the huge amount of toxic waste remains next to the nesting beach and erosion is accelerating at an alarming speed. Despite government reports, light pollution is still a major problem, abandoned buildings and greenhouses are still present on the beach, summerhouses and a wedding hall continue to operate in the nesting area, and information signs are severely lacking.

At the **2019** Standing Committee meeting, MEDASSET reported the lack of implementation of Recommendation No 95 to tackle conservation problems such as coastal erosion, litter, sand extraction, light pollution, coastal fishing during the nesting season and lack of public awareness. the According to the Government report "the amount of chromium neutralized in this facility is around 800.000 tons." MEDASSET noted the slow progress in removing the toxic waste, despite government commitments that the process would be completed by 2019. The Standing Committee urged the Turkish authorities to implement all points of Recommendation No. 95 (2002) and requested an updated report in 2021.

At the **2021** Standing Committee meeting, MEDASSET reported the lack of implementation of Recommendation No 95 to tackle conservation problems such as coastal erosion, litter, sand extraction, light pollution, coastal fishing during the nesting season and lack of public awareness. The Standing Committee took note of the updated information provided by both parties and thanked the Turkish authorities and MEDASSET for their presentations. The Committee took note of the complainant's concerns that progress in the implementation of Recommendation No. 95 (2002) was lacking, especially concerning the erosion of the nesting beach and T-PVS(2021)MISC - 22 - building removal. The Committee expressed its regret that the project in cooperation with the METU Marine Sciences Institute on the factors causing coastal erosion, due to lack of funds, could not be implemented. The Standing Committee urged the Turkish authorities to implement all conditions of Recommendation No. 95 (2002) and to accelerate the neutralisation process of the remaining hazardous wastes, hoping that in 2023 all waste would be neutralised. Both parties were invited to submit updated reports in two years.

At the **2023** Standing Committee meeting, MEDASSET reported the continued lack of implementation of Recommendation No 95 to tackle conservation problems such as coastal erosion, litter, sand extraction, light pollution, coastal fishing during the nesting season and lack of public awareness. The Standing Committee took note of the reports of both parties, thanked MEDASSET, the complainant organization, for its oral presentation, but regretted the lack of participation of the Turkish authorities in the discussion. It noted only limited progress in the implementation of Recommendation No. 95 (2002) and remained very preoccupied by the situation of sea turtles at Kazanlı beach. More generally, it requested full implementation of Recommendation No. 95 (2002) with no further delay, especially to implement the erosion control and the toxic waste removal. It referred to its newly adopted guidance tool on the

Conservation of sea turtles nesting sites and encouraged both parties to make full use of it in their work. It invited both parties to report to the Bureau in Autumn 2025 ahead of the following Standing Committee meeting.

At the **2025** Standing Committee meeting, MEDASSET reported the continued lack of implementation of Recommendation No 95 to tackle conservation problems such as coastal erosion, litter, sand extraction, light pollution, coastal fishing during the nesting season and lack of public awareness. The Standing Committee thanked the Government for its report, and both Government and Complainant for their presentations. It welcomed the efforts of the Turkish Government towards the removal of some buildings and the taxi parking in the K1 zone, the improved water treatment practices in the Kazanli urban area, and further advances in the management of the area. However, the Committee was deeply concerned about the steady decrease in the numbers of nests of *Chelonia mydas* at Kazanli beach, reported by the authorities. It urged the authorities to pursue the removal of structures and greenhouses from the dunes, reported on by both complainant and authorities (Point 1 of Recommendation No 95 (2002)). The Committee regretted that nocturnal light pollution, the presence of cars and of plastic and urban debris in the dunes and beaches (Rec. 3 and 10) have not been effectively tackled by the Turkish authorities. It was concerned with the massive accumulation of agricultural waste and plastic debris on the road along the beach and urged the Government of Türkiye to ensure that the municipalities dispose of it safely and regularly remove it from the road and zones nearby to prevent it spreading onto the beach. The Committee was alarmed that after more than 25 years a huge volume of highly toxic chemical residues are still stored in the factory attached to the nesting site, polluting the beach and wildlife there. Removal and/or adequate treatment of the highly toxic residues, included in Recommendation No 66 (1998), is advancing very slowly, while the negative impact on the beach is visible and there were reports of the deaths of fish and turtles due to the incidental spread of the chemicals. It regretted insufficient monitoring of the sea turtle nesting activity in the area (Rec. 5) and ineffectiveness of the information and public awareness raising campaigns (Rec.7), and urged the authorities to advance decisively in implementing Recommendation No 95 (2002). Based on the information provided by the parties, **the Committee decided to re-open the case file** and called both the Complainant and the Government to report to the Bureau in September 2026.

ANNEX 2: REFERENCES

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RELEVANT RECOMMENDATIONS OF THE STANDING COMMITTEE:

- No. 7 (1987) On the protection of marine turtles and their habitat;
- No. 8 (1987) On the protection of marine turtles in Dalyan and other important areas in Turkey;
- No. 12 (1988) Concerning the protection of important turtle nesting beaches in Turkey;
- No. 13 (1988) Concerning measures for the protection of critical biotopes of endangered amphibians and reptiles;
- No. 24 (1991) On the protection of some beaches in Turkey of particular importance to marine turtles;
- No. 66 (1998) On the conservation status of some nesting beaches for marine turtles in Turkey;
- No. 95 (2002) On the conservation of marine turtles in Kazanlı beach (Turkey)