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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

46th meeting

Strasbourg, 7-11 December 2026

Bureau of the Standing Committee

22 - 24 September 2026

Strasbourg

Open complaint: 2000/01

Conservation of Marine Turtles in Kazanlı Beach (Türkiye)

- GOVERNMENT REPORT -

Document prepared by the MINISTRY OF AGRICULTURE AND FORESTRY
GENERAL DIRECTORATE OF NATURE CONSERVATION AND NATIONAL PARKS
REPUBLIC OF TÜRKİYE

MINISTRY OF AGRICULTURE AND FORESTRY
GENERAL DIRECTORATE OF NATURE CONSERVATION AND NATIONAL PARKS

REPORT ON THE CONSERVATION OF SEA TURTLES IN KAZANLI BEACH FOR FALL 2026 BUREAU MEETING

REVIEW AND ASSESSMENT REPORT

SUBJECT: Recommendation No.95 (2002) on Conservation of Marine Turtles in Kazanlı Beach

This report has been prepared with the aim of establishing a roadmap to be followed following the submission of the progress report containing updated information and supporting documentation, taking into account the letter of 22 December 2025 from the Secretariat of the Bern Convention of the Council of Europe concerning the conclusions of the 45th Standing Committee Meeting and the assessments on the implementation status of Recommendation No. 95 (2002) on the Conservation of Sea Turtles in Kazanlı Beach, Türkiye.

REVIEW AND FINDINGS

Recommendation of the Bern Convention on the Conservation of European Wildlife and Natural Habitats – Recommendation No. 95 (2002):

1. Urgent removal of greenhouses located close to the sea in section K3; and subsequent removal of other greenhouses in this area through appropriate legal and administrative procedures, with the aim of restoring this part of the coast for turtle nesting.

In section K3 of Kazanlı Beach, there are greenhouses still being cultivated very close to the coastline. As a result of the site inspection, official letters were written to the Provincial Directorate of Agriculture, Akdeniz Municipality, and the Provincial Directorate of Environment, Urbanization and Climate Change regarding the greenhouses located on Parcel No. 311, Block 56 in Kazanlı Neighborhood, Akdeniz District, which belongs to Akdeniz Municipality. In the response letter sent by the Provincial Directorate of Environment, Urbanization and Climate Change dated 20/05/2026 and numbered E-51133370-000-15715494 for information, Akdeniz Municipality was requested to “inform relevant institutions regarding the removal and eviction procedures of the greenhouses on Parcel No. 311, Block 56, located in Kazanlı Neighborhood, Akdeniz District, and owned by Akdeniz Municipality.” Furthermore, from the letter dated 19/06/2026 and numbered E-51133370-000[33130122744]-15954727 sent by the Provincial Directorate to an occupant greenhouse operator, it is understood that the occupant operators were requested to evacuate within 15 days as the area falls within the Kazanlı Sea Turtle Nesting Area and below the Coastal Edge Line (Annex-1).

On 22 July 2026, a site inspection was carried out by the General Directorate of Nature Conservation and National Parks. During the inspection, it was determined that the greenhouse, which had been ordered to be demolished within 15 days, had not yet been removed. Following

this finding, consultations were held with the Provincial Directorate of Environment, Urbanization and Climate Change. The Provincial Directorate has referred the matter to the District Governorship and is currently awaiting the necessary administrative response for the demolition to be carried out.

2. Immediate relocation of the taxi parking area away from the beach.

The aforementioned taxi parking area at the Kazanlı Sea Turtle Nesting Beach was located on the northern side of the existing Caretta Park facing the Kazanlı Coastal Road. However, within the scope of the referenced Recommendation decision, it was removed years ago, and no taxi parking area currently exists.

3.Regular collection of plastic waste from the beach.

At the Kazanlı Sea Turtle Nesting Beach, cleanup work was carried out several times prior to the nesting season and due to the flood disasters and storms experienced in May in the Kazanlı Sea Turtle Nesting Area, and waste, logs, and bushes resulting from the flood were cleaned from the beach. A staff member employed under the İŞKUR (Turkish Employment Agency veya Turkish Employment Organization) Workforce Adaptation Project continued beach cleaning and garbage collection activities until June 30 (employment contract concluded).

In addition, an on-site inspection visit was conducted on the Kazanlı coast on 26/01/2026 together with Mersin Metropolitan Municipality, Akdeniz Municipality, and Mersin Provincial Directorate of Environment, Urbanization and Climate Change, and subsequently, garbage and waste dumped on the roadside north of the nesting beach and spread across the field were removed at regular intervals (Annex-2 a). However, illegal garbage dumping in the area still continues periodically. Legal proceedings to issue a fine against a citizen caught dumping garbage are underway.

However, fragmented plastic waste continuously washes ashore from the sea onto the beach. Although cleaning is carried out on the beach, successful results cannot be fully obtained due to the continuous arrival of plastic waste from the sea. When the issue was investigated, it was understood that at the Adana Seyhan Wastewater Treatment Plant, plastic waste introduced in chopped form into wastewater by industrial facilities processing plastic (Recycling Facilities) is discharged into the TD-8 Channel without being adequately retained; the TD-8 Channel within Adana boundaries connects to the TD-0 channel passing through Tarsus Baharlı Neighborhood in our province, and plastic waste reaching the sea via these channels and the Seyhan River washes ashore along the coasts of our province, primarily Kazanlı. The matter has been reported to the Provincial Directorate of Environment, Urbanization and Climate Change, Mersin Metropolitan Municipality, and Akdeniz Municipality (Annex-2 b).

4. To prevent light pollution on the beach, lighting from Kazanlı Municipality and the Soda-Chromium Factory should be properly shielded.

On-site inspections are conducted by our Directorate before the sea turtle nesting season, and the relevant Municipality is requested to demolish unlicensed businesses and warn existing businesses regarding the prevention of light pollution. In addition, light pollution is monitored by our

personnel present in the field throughout the season, and businesses are required to take measures when necessary.

On 21–22 July 2026, a site visit was conducted during both daytime and night-time hours by a team comprising personnel from the headquarters and provincial units of the General Directorate of Nature Conservation and National Parks. During the inspection, official inspection records were prepared regarding establishments causing light pollution, and the necessary consultations were initiated to ensure the removal of the identified sources of light pollution.

However, following consultations with the Soda-Chromium Factory and the site inspections carried out in the area, no conditions that could give rise to light pollution, as alleged in the complainant's report, were identified. This finding has been documented and reported separately as an additional assessment (Annex-3).

5.Continued monitoring of chemical discharges from the Soda-Chromium factory into the sea; establishment of a permanent and reliable monitoring system for nesting activity on the beach; assessment of the additional burden placed on Kazanlı's natural environment by substances discharged from the Soda-Chromium Factory; and monitoring the impact of these wastes on wildlife.

Wastewater generated during production at the Soda-Kromsan factory is treated at the Kromsan Factory Wastewater Treatment Plant and discharged within the scope of the Environmental Law and relevant regulations. The facility holds an Environmental Permit. In the response letter from the Provincial Directorate of Environment, Urbanization and Climate Change, which conducts inspections and from which requested information on the matter, it was stated: "There is a wastewater treatment plant with a capacity of 100 m³/day for domestic wastewater originating from the facility and a wastewater treatment plant with a capacity of 1200 m³/day for industrial wastewater, and the rainwater channels in the ETAN storage area are also connected to the industrial wastewater treatment plant. The limit values for water discharged from the wastewater treatment plant into the receiving environment are specified in the tables annexed to the Regulation on Water Pollution Control, with limit values for domestic wastewater given in Table 21.1 and for industrial wastewater in Table 19." It was further explained by the Mersin Provincial Directorate of Environment, Urbanization and Climate Change that in addition to routine inspections, unannounced inspections are conducted where wastewater samples are taken from the effluent of the relevant wastewater treatment plants to verify whether pollutant parameters remain below limit values (Annex-4).

6.Establishment of a coastal erosion monitoring program to enable timely measures when necessary.

A cooperation protocol entitled "Mersin Province Kazanlı Beach Coastal Erosion Assessment Project" was signed between the General Directorate of Nature Conservation and National Parks and the Middle East Technical University (METU) Institute of Marine Sciences, and entered into force on 18 May 2026 (Annex-5).

The project aims to establish a scientific coastal erosion monitoring programme for Kazanlı Beach in order to determine the extent and causes of coastal erosion and to identify appropriate erosion prevention measures. The monitoring programme will be implemented over a 12-month period (18 May 2026 – 30 May 2027) and includes monthly drone-based shoreline surveys, additional surveys following major storm events, GNSS-supported measurements, and the preparation of orthomosaic maps and digital elevation models.

The project is being carried out jointly by the Mersin Provincial Directorate of Nature Conservation and National Parks and researchers from the METU Institute of Marine Sciences. An interim report will be prepared after six months, and a final report will provide scientific recommendations for coastal protection and erosion prevention measures for Kazanlı Beach.

7. Conducting public awareness activities, especially targeting the local population, about the presence of turtles and their nests in Kazanlı.

During field studies in the Kazanlı region, awareness and information activities targeting citizens are carried out by our team. Information brochures were distributed to participants during beach cleanups on 08/05/2026 and 12/06/2026, and information was provided to fishermen operating in the Kazanlı region during the Karaduvar and Çamlıbel Fishermen meetings organized jointly with the Coast Guard Command on 17/04/2026 and 27/04/2026 (Annex-5). An official letter was sent to the National Education Directorate to provide training in schools in the Kazanlı Region, and school trainings will be organized. Information and educational activities were also conducted for 7 schools at the Mersin Sea Turtle Rescue, Rehabilitation and Information Center located in 100th Year Gümüşkum Nature Park, Davultepe Neighborhood, Mezitli District. A release program for 3 sea turtles whose treatment was completed at the Center was held in Erdemli District, and through the program broadcast in national and local media, awareness and sensitivity were created among our citizens regarding the protection of sea turtles throughout the entire province (Annex-6).

8. Full implementation of the existing environmental planning regulation and ensuring the provision of necessary financial and human resources.

In the 1/100,000 scale Mersin-Adana Region Environmental Land-Use Plan, the area is designated as a Sea Turtle Nesting Area (Annex-7).

9. Demolition of the illegal building located in section K1 of the coastal zone.

The illegal building located in Section K1 of Kazanlı Beach was removed in February 2024.

10. Proper disposal of hazardous waste accumulated near the shore over the years due to industrial activities.

Information was requested from the Mersin Provincial Directorate of Environment, Urbanization and Climate Change, which is responsible for waste control, and in the response letter received, it was stated: “Regarding the matter, Türkiye Şişe ve Cam Fabrikaları A.Ş. Şişecam Chemicals Mersin Kromsan Factory operating in Kazanlı locality, Akdeniz District of our province produces

sodium bichromate and other chromium compounds. Process waste originating from technologies used by the factory between 1984 and 1998 is evaluated as 'hazardous waste' because it contains Cr+6 (hexavalent chromium) compounds. These wastes are temporarily stored within an area of 150,000 m² inside the factory site, covered with an impermeable polyethylene sheet, and surrounded by drainage channels.

Inside the factory, there is an ETAN (Neutralization of Old Technology Wastes) facility aimed at converting old technology hazardous waste into 'non-hazardous waste' form, and there are currently 1,326,161 tons of unprocessed hazardous waste on the factory site. At the ETAN facility, an average of 180 to 200 thousand tons of hazardous waste per year is converted into non-hazardous waste form through neutralization process, and disposed of by landfilling in the 2nd class sanitary landfill site (Lot-2) belonging to Türkiye Şişe ve Cam Fabrikaları A.Ş. Şişecam Chemicals Mersin Kromsan Factory located in Sariibrahimli locality, Akdeniz District, Mersin Province, which holds an Environmental Permit and License Certificate on 'Sanitary Landfill' within the scope of the Regulation on Sanitary Landfill of Wastes.

Groundwater observation boreholes have been drilled around the ETAN storage area for monitoring purposes, comprising a total of 4 observation wells, 1 of which serves as a reference well. Groundwater samples are taken from the observation wells at least twice a year by the Mersin Provincial Directorate of Environment, Urbanization and Climate Change and sent to the TÜBİTAK Marmara Research Center laboratory for analysis.

Upon the request of our Ministry, a report containing the opinion letter of the 6th Regional Directorate of State Hydraulic Works (DSİ) regarding the locations and suitability of the wells for sampling was prepared by the Cukurova University Faculty of Engineering, Department of Geological Engineering, covering the physical and technical properties of the wells and the hydrological and hydrogeological characteristics of the temporary storage area and its surroundings.

Furthermore, the facility in question has been defined as a 'Suspected Site' by our Directorate under the Regulation on Control of Soil Pollution and Point Source Contaminated Sites. The reports containing soil and groundwater analyses that the facility is obligated to prepare under the Regulation are reviewed and monitored by the Contaminated Site Evaluation and Monitoring Commission established under the chair of our Directorate pursuant to the Governorship Approval dated 06/03/2023 and numbered 5866302. The site monitoring process by the commission will continue even after the hazardous wastes stored at the ETAN facility are completely processed and disposed of" (Annex-4).

Information was also requested from the Kromsan Factory on the subject, and in the response letter received, it was reported that 2,060.155 tons of waste have been neutralized so far at the ETAN facility, neutralization works are carried out in fields No. 1, 2, 3, and 5, fields No. 1 and 2 have reached ground level, and work is ongoing in field No. 3. Additionally, based on their application dated 06/11/2012 and numbered SEÇ-637 for the ETAN Facility, temporary hazardous waste storage permission was obtained from the former Provincial Directorate of Environment and Urbanization until the end of 2023; however, the waste quantity specified in the temporary storage permit did not include the waste quantity below ground level under the conditions of that period,

and therefore the total waste quantity exceeded the waste quantity specified in the permit scope. Maintenance processes of machinery and equipment and the inability to work during rainy periods also prolonged the process. When the factory applied to the Provincial Directorate of Environment, Urbanization and Climate Change in 2023 for an extension of the temporary hazardous waste storage permit, it was understood that they needed to obtain a hazardous waste pre-treatment license under the Regulation on General Principles of Waste Pre-Treatment and Recovery Facilities. Hence, they submitted their application for the licensing process, which is currently ongoing. It is understood that neutralization works at the ETAN facility and landfilling of neutralized wastes in Sariibrahimli are continuing (Annex-8).

During the inspection visit conducted at the factory on 21–22 July 2026, consultations were held regarding the disposal of the waste storage area in question. As presented in Annex-3, the areas where the waste has already been disposed of, as well as the remaining waste areas, were inspected on site. Discussions focused on the timeframe required for the disposal of the remaining waste, and the General Directorate of Nature Conservation and National Parks requested that the company submit a detailed implementation schedule for the completion of the disposal activities. The implementation schedule is provided at the end of Annex 3.

11.Relocation of the wedding hall on Kazanlı Beach to another site.

The Municipal Wedding Hall on the Kazanlı coast has been demolished.

12.Implementing appropriate wastewater management and eliminating pollution in the backshore area of the beach.

Kazanlı sewage waste is transferred to the Karaduvar Wastewater Treatment Plant via the Kazanlı pumping station, where full biological treatment is applied and deep sea discharge is executed.

13.Seeking appropriate legal mechanisms to remove houses built on the beach through legal means.

During the inspection visit conducted on 23 July 2026, it has been determined that the residential buildings known as “Onur Sitesi” are still present on Kazanlı Beach. However, as this area is designated as a protected archaeological site, no new development or construction is permitted in the surrounding area. The property is privately owned and titled, and the existing lighting is not considered to be of a level that would significantly affect the nesting beach.

During the site inspection, a single elevated light was identified on the balcony of one residence, which was being used to illuminate the parking area located on the beach-facing side of the building. The matter was discussed with the site management, and consultations will be undertaken to ensure that the light fixture is properly shielded so as to prevent light spill onto the beach.

14.Reducing the impact of agricultural chemicals used in and around Kazanlı.

In Kazanlı, activities related to Biological and Biotechnical Control are carried out by the Akdeniz

District Directorate of Agriculture and Forestry.

ANNEXES:

Annex-1: Correspondence on the Removal of Greenhouses

Annex-2 a: Removal of garbage on the coastal road

Annex-2 b: Letter of Mersin Directorate of Nature Conservation and National Parks dated 01.07.2026 and numbered E-31875023-335.01-25510297

Annex-3: ETAN Facility-Soda Krom Factory July Report

Annex-4: Letter of Mersin Provincial Directorate of Environment, Urbanization and Climate Change dated 10.06.2026 and numbered 15814876

Annex-5: Kazanlı Beach Coastal Erosion Protocol

Annex-6: Information and awareness activities

Annex-7: Environmental Land-Use Plan

Annex-8: Letter of Şişecam Kimyasalları A.Ş. dated 23.06.2026 and numbered 95982

REPUBLIC OF TÜRKİYE
GOVERNORSHIP OF MERSİN
Provincial Directorate of Environment, Urbanization and Climate Change
Ref No / Sayı: E-51133370-000-15715494 / 371-45280268
Subject / Konu: Kazanlı Sea Turtle Nesting Area
TO DISTRIBUTION LIST (DAĞITIM YERLERİNE)

References (İlgi):

a) Official letter of the Republic of Türkiye dated 13.05.2026 and numbered E-31875023-335.01-24772623.

b) Official letter of the Directorate of Legal Affairs (Muhakemat Müdürlüğü) dated 02.05.2025 and numbered E-70291665-641.03.01.04-3952015.

c) Official letter of Mersin Provincial Directorate of Environment, Urbanization and Climate Change (Deputy Director of National Real Estate - Akdeniz Service) dated 20.02.2025 and numbered E-51133370-000-11819120.

ç) Official letter of Mersin Cadastre Directorate dated 23.05.2025 and numbered E-40519554-170.03.02-16574244.

d) Official letter of Mersin Provincial Directorate of Environment, Urbanization and Climate Change (Deputy Director of National Real Estate - Akdeniz Service) dated 25.07.2025 and numbered E-51133370-000-13123316.

e) Official letter of the Directorate of Legal Affairs dated 02.09.2025 and numbered E-70291665-641.03.01.04-4221759.

f) Official letter of Mersin Provincial Directorate of Environment, Urbanization and Climate Change (Deputy Director of National Real Estate - Akdeniz Service) dated 20.10.2025 and numbered E-51133370-000-13453420.

g) Our official letter dated 18.05.2026 and numbered E-51133370-000-15639202.

ğ) Official letter of the Department of Environmental Protection and Control dated 08.05.2026 and numbered E-62960472-611.99-1282103.

By letter referenced (a), it is reported that in the letter forwarded by the Secretariat of the Bern Convention of the Council of Europe regarding the file titled 'Protection of Sea Turtles in Kazanlı Beach', a re-evaluation was conducted regarding Kazanlı Beach within the scope of the recommendation decision, and a file was re-opened against Türkiye at the 45th Standing Committee Meeting held on December 8–12, 2025. It is further stated that, as a country, we have been invited to submit a report to the Secretariat in September 2026 on the work carried out on this matter. As a result of on-site inspections conducted at Kazanlı Beach by independent experts appointed by the Bern Secretariat, it was reported that the removal of greenhouses located on the beach was recommended. Following inspections regarding plot no. 56, block 311 in Kazanlı Quarter, Akdeniz District, where the greenhouses are situated, it was determined that title ownership still belongs to Akdeniz Municipality. However, since the lawsuit for title deed cancellation and registration filed regarding this property was concluded in favor of the Treasury of Finance and finalized by a Decision of the Court of Cassation, Akdeniz Municipality stated that the removal of greenhouses and the rehabilitation of the dune area belong to the Mersin Provincial Directorate of Environment, Urbanization and Climate Change. Consequently, it has been requested that the greenhouses on the aforementioned property be urgently removed and the outcome be reported.

By letter referenced (b), regarding various immovable properties including plot no. 56, block 311 in Kazanlı Quarter, Akdeniz District, in the lawsuit filed by Akdeniz Mayor's Office against the Treasury of Finance (currently pending under Case File No. 2024/126 of Mersin 9th Civil Court of

First Instance), during the hearing held on 08.01.2024, a final peremptory period of two weeks was granted to the parties 'to perform registration procedures in the name of the Treasury of Finance in line with Decision E. 2012/308 K. 2022/199 of Mersin 1st Civil Court of First Instance in Case File No. 2012/308'. Accordingly, it was requested that registration procedures in the name of the Treasury of Finance be carried out urgently in line with said decision and that the Directorate of Legal Affairs and Mersin 9th Civil Court of First Instance be informed of the outcome.

By letter referenced (c), it was requested that registration declaration forms for the execution of the Court Decision specified in letter referenced (b) be prepared and submitted to the relevant Land Registry Directorate for registration procedures.

By letter referenced (ç), it was reported that the map/sketch sections of the technical expert report dated 27.07.2021 referenced in the Court Decision mentioned in letter referenced (a) and requested for execution via letter referenced (c) were illegible; and although the operative part of the Court Decision ruled for title deed cancellation via subdivision for the parts designated as 'A' of plot 56 block 311, plot 94 block 311, plot 271 block 346, and plot 272 block 346, no transaction could be performed due to the absence of a sketch showing the subdivision line, coordinate summary, and area calculation for these plots in the expert report. Hence, it was stated that an order for clarification/rectification (tavzih) must be obtained for the file in question.

By letter referenced (d), obtaining an order for clarification/rectification (tavzih) in accordance with the issues specified in letter referenced (ç) was requested from the Directorate of Legal Affairs.

By letter referenced (e), it was stated that the request specified in letter referenced (d) could be evaluated after receiving an opinion from the competent Court.

By letter referenced (f), an opinion was requested from the competent Court in line with the matters in letter referenced (e), but no response has been received to date.

By letter referenced (g), since the Court Decision regarding partial title cancellation of various immovable properties including plot 56, block 311 in Kazanlı Quarter, Akdeniz District could not be executed because the expert report forming the basis of the Court Decision and providing an opinion on partial cancellation was found insufficient by Mersin Cadastre Directorate, it was requested from the Directorate of Legal Affairs to forward to our Directorate an expert report suitable for issuing a registration notification statement through procedures to be conducted by the Directorate of Legal Affairs (such as obtaining a clarification decision, consulting the relevant Court, filing a new lawsuit, etc.).

By letter referenced (ğ), it was stated that garbage and waste management in coastal and beach areas falls under the authority and responsibility of district municipalities.

Therefore, in line with the demand specified in letter referenced (a), I hereby respectfully request that the greenhouses located on plot no. 56, block 311 in Kazanlı Quarter, Akdeniz District, which currently remain under the ownership of your Municipality, be removed and relevant institutions be notified regarding the eviction procedures; And I present this for necessary action.

Hasan ALAN Provincial Director of Environment, Urbanization and Climate Change

Action (Gereği):

To the Mayor's Office of Akdeniz

Information (Bilgi):

To Mersin Directorate of Nature Conservation and National Parks To Mersin Metropolitan Municipality (Department of Environmental Protection and Control)

REPUBLIC OF TÜRKİYE
Mersin Governorship
Provincial Directorate of Environment, Urbanization and Climate Change

Number: E-51133370-000[33130122744]-15954727

Subject: Eviction (Parcel No. 56, Block 311, Kazanlı)

Mr. Ali ERASLAN

Kazanlı Neighbourhood, Sahil Street No. 2

Akdeniz / Mersin

Following the on-site inspection conducted on 19 June 2026, it was determined that you have unlawfully occupied the property located in Kazanlı Neighbourhood, Akdeniz District, Mersin Province, identified as Parcel No. 56 of Block 311, by constructing a greenhouse and a house. As the property is located within the Kazanlı Sea Turtle Nesting Beach and below the Coastal Setback Line, you are required to vacate the property within fifteen (15) days from the date of notification of this letter.

Failure to comply with this notice will result in your eviction through legal enforcement procedures pursuant to Article 75 of the State Tender Law No. 2886 and Article 89 of the Regulation on the Administration of Treasury Immovable Properties issued under that Law.

Kindly be informed accordingly.

Hasan ALAN

Provincial Director of Environment, Urbanization and Climate Change

REPUBLIC OF TÜRKİYE
GOVERNORSHIP OF MERSİN
Provincial Directorate of Agriculture and Forestry
Ref No / Sayı: E-50458482-230.99-24834694 / 45820789
Subject / Konu: Kazanlı Sea Turtle Nesting Area (Natural Protected Area)
TO MERSİN DIRECTORATE OF NATURE CONSERVATION AND NATIONAL PARKS
(MERSİN DOĞA KORUMA VE MİLLİ PARKLAR MÜDÜRLÜĞÜNE)

Reference (İlgi): Your official letter dated 05.05.2026 and numbered E-31875023-335.01-24670782. In your referenced letter, taking into account that the sea turtle nesting season will commence as of May 15, it was requested that garbage and solid waste dumped within the Qualified Natural Protection Area on Kazanlı beach be urgently collected and removed from the sea turtle nesting area, and that greenhouses located below the coastal edge line on the portion of Kazanlı beach close to the Soda Factory be removed, with necessary actions being taken and the Secretariat of the BERN Convention being informed of the outcome.

Since there is no spatial numerical data (such as coordinates or neighborhood, block, parcel information) regarding the areas of the greenhouses stated to be located below the coastal edge line in the portion of Kazanlı beach close to the Soda Factory in your referenced letter, nor any information as to whether the area in question falls within an approved implementation zoning plan currently in force, no action could be taken within the scope of Law No. 5403 on Soil Conservation and Land Use.

Article 1, paragraph (2-a) of Chapter One of the Regulation on the Protection and Use of Agricultural Lands, published in the Official Gazette dated April 4, 2026, and numbered 33214, states as follows:

"This Regulation covers agricultural lands other than areas within the scope of the Forest Law dated 31/8/1956 and numbered 6831, the Pasture Law dated 25/2/1998 and numbered 4342, non-agricultural areas specified in Law No. 5403, approved village/rural settled areas and their surroundings as well as settled areas, approved planned areas compliant with relevant legislation with the exception of areas designated in zoning plans as areas whose agricultural character is to be protected, parcels that have gained the status of building plots attached to an approved plan provided that the plan is in force, and places defined with non-agricultural status or having gained building plot status during initial land registry establishment."

Therefore, regarding greenhouses that are located within approved planned areas compliant with relevant legislation (except for areas designated in zoning plans as areas whose agricultural character is to be protected), or constructed with permission granted within the scope of Law No. 5403 which entered into force on 19.05.2005, or constructed with permission under the legislation in force prior to the effective date of Law No. 5403, there is no action that can be taken by our Provincial Directorate within the scope of Law No. 5403 for their removal.

Furthermore, in cases where greenhouses are built without authorization in areas subject to Law No. 5403, action is taken pursuant to Article 21 of the Law. Under Article 21 of said Law, there is no provision requiring the immediate removal of unauthorized greenhouses in such areas.

I present this for your information and necessary action.

Erdem KARADAĞ

Provincial Director

This document

T.C.
AKDENİZ MUNICIPALITY
Directorate of Legal Affairs

Ref No / Sayı: E-38268688-641.03.01-138095

Subject / Konu: Treasury of Finance 2012/308 Court of Cassation Decree (Maliye Hazinesi 2012/308 Yargıtay İlâmı)

Date: 10/06/2024

**TO THE DIRECTORATE OF ZONING AND URBAN PLANNING
(İMAR VE ŞEHİRCİLİK MÜDÜRLÜĞÜNE)**

Upon the claim by the counsel for the plaintiff Treasury of Finance that plots numbered 379, 391, 1391, 1393, and 1529 in Kazanlı Village were allocated as pastureland prior to cadastre survey pursuant to decision dated 29/01/1954 and numbered 10-36/39 of the Land Distribution Commission No. 46, and that Kazanlı Municipality subsequently registered these properties—which possess public property status—in its own name in the land registry by correction in a manner turning them into private property; upon the Treasury becoming aware of this situation, a lawsuit was filed by the Treasury before Mersin 1st Civil Court of First Instance requesting the determination of whether the immovables in Kazanlı Village numbered plot 379, 2393, 2395, 3644, 3645, 3646, 3647, 3648, 4281, 3317, 3962, 3963, 3964, 3965, 3966, 3967, 3968, 3969, 3970, 3971, 3972, 3973, 3974, 3975, 3976, 3977, and 3978 are utilized in accordance with their designated purpose under zoning status, whether they are subject to private ownership, and for registration in the name of the Treasury.

In the aforementioned lawsuit, the Court ruled in its decision dated 09.06.2022, Merits No. E.2012/308, Decision No. K.2022/199 as follows:

"For the reasons explained;

1- WITH THE ACCEPTANCE OF THE MAIN LAWSUIT; To CANCEL the land registry records of the immovables located in Mersin Province, Akdeniz District, Kazanlı Neighborhood:

- Block 311, Plot 22 (former plot 379);
- Block 311, Plot 29 (former plot 2393);
- The portion measuring 49,572.92 m² designated as 'A' in the surveyor expert report of Block 311, Plot 56 (former plot 2395);
- The portion measuring 374,032.55 m² designated as 'A' in the surveyor expert report of Block 366, Plot 94 (former plot 4281);
- Block 366, Plot 205 (former plot 4281);
- Block 351, Plot 1 (former plot 3648);
- Block 352, Plot 1 (former plot 3647);
- Block 357, Plot 1 (former plot 3646);
- Block 362, Plot 1 (former plot 3645);
- Block 363, Plot 1 (former plot 3644);
- The portion measuring 30,273.55 m² designated as 'A' in the surveyor expert report of Block 346, Plot 271 (former plot 3317),

2- To CANCEL the land registry records registered in the name of the defendant Akdeniz Municipality for the immovables in Mersin Province, Akdeniz District, Kazanlı Neighborhood: Block 346 Plot 442 (former 3962), Block 346 Plot 441 (former 3963), Block 346 Plot 438 (former 3964), Block 346 Plot 435 (former 3965), Block 346 Plot 434 (former 3966), Block 346 Plot 433 (former 3967), Block 346 Plot 402 (former 3978), Block 346 Plot 403 (former 3977), Block 346 Plot 404 (former 3976), Block 346 Plot 405 (former 3972), Block 346 Plot 414 (former 3971), Block 346 Plot 415 (former 3973), Block 346 Plot 416 (former 3974), Block 346 Plot 417 (former 3975), Block 429 Plot 28 (former 3968), Block 429 Plot 29 (former 3969), Block 429 Plot 30 (former 3970), and to REGISTER them in the name of the Treasury of Finance,

3- WITH THE ACCEPTANCE OF THE JOINED LAWSUIT; To CANCEL the land registry records of the portion measuring 258,498.01 m² designated as 'A' in the surveyor expert report of Block 346, Plot 272 (former plot 3640) and Block 346, Plot 268 (former plot 3319) in Mersin Province, Akdeniz District, Kazanlı Neighborhood,

4- To consider the expert report dated 27.09.2021 and 6 attached sketches as an integral part of the decision,

5- Since the plaintiff is exempt from court fees, NO COURT FEES ARE TO BE LEVIED,

6- Pursuant to Article 36/A of Law No. 3402, litigation expenses incurred by the plaintiff shall REMAIN WITH THE PLAINTIFF TREASURY, and for the same reason, NO ATTORNEY FEES SHALL BE AWARDED in favor of the plaintiff."

The Court Decision was appealed by counsel for the plaintiff and by our side. The 7th Civil Chamber of the Court of Cassation, examining the appeal request, ruled in its decision dated 04/10/2023, Merits No. E.2023/3662, Decision No. K.2023/4404 as follows:

"For the reasons explained; To DISMISS all appeal objections of counsels for both parties deemed unfounded, and to AFFIRM the decision which is in compliance with procedure and law, with the right to request correction of decision open within 15 days from notification of the decision."

Following our application for correction of decision against the Court of Cassation Affirmation Decision, the 7th Civil Chamber of the Court of Cassation, examining the request, ruled in its decision dated 13.03.2024, Merits No. E.2024/681, Decision No. K.2024/1506 as follows:

"To REJECT the request for correction of decision."

The court decision has finalized.

Submitted for your information and necessary action.

Esen ŞENTUT ÖZGÜN

Head of Legal Affairs (Hukuk İşleri Müdürü)

Attachments:

1. Finalization Annotation (Kesinleşme Şerhi)
2. Court of Cassation Decree - Civil (Yargıtay İlâmı - HUKUK)

T.C.
AKDENİZ MUNICIPALITY
Directorate of Zoning and Urban Planning
Ref No / Sayı: E-57526124-756.99-192219
Subject / Konu: BERN Convention Kazanlı Beach (BERN Sözleşmesi Kazanlı Kumsalı)

Date: Undated (Bila Tarihli)
TO DISTRIBUTION LIST
(DAĞITIM YERLERİNE)

Reference / İlgi: Your official letter dated 07.11.2025 and numbered E-31875023-740-21855416.

In the letter dated October 27, 2025, forwarded by the Secretariat of the Bern Convention of the Council of Europe regarding the evaluation of the implementation status of Recommendation No. 95 (2002) on the Conservation of Sea Turtles in Kazanlı Beach, Türkiye, it was stated that while the efforts of the Turkish authorities to remove certain structures in the area were welcomed, there is a continuous decrease in the number of nests; that several critical recommendations (1, 2, 3, 5, Chelonia mydas 7, 10, and 14) were either not implemented at all or only partially implemented; that in particular, the presence of greenhouse structures, vehicle headlights, plastic and chemical pollution, and toxic waste from the factory near the nesting area constitute a source of serious concern; furthermore, that deficiencies persist regarding the effective monitoring of nesting activities (Recommendation 5) and inadequate information/awareness-raising efforts (Recommendation 7); and that for these reasons, if concrete progress is not achieved under Recommendation No. 95 (2002), the re-opening of the file may be considered.

In this context; in your referenced letter, it was stated that the greenhouses mentioned are located on plot 56, block 311 in Kazanlı Neighborhood, Akdeniz District of our Province, situated within the Kazanlı Sea Turtle Nesting Area and below the coastal edge line, and that title deed ownership belongs to our Municipality, requesting the urgent removal of the greenhouses, the rehabilitation of the sand dune area, and reporting the outcome.

As a result of the title deed cancellation and registration lawsuit filed by the Provincial Directorate of Environment and Urbanization, ownership of the aforementioned plot 56, block 311 in Kazanlı Neighborhood, Akdeniz District, has been finalized by a Decision of the Court of Cassation to belong to the Treasury of Finance. The Court decision is attached hereto, and the removal of greenhouses on plot 56, block 311 in Kazanlı Neighborhood and the rehabilitation of the sand dune area fall under the responsibility of the Mersin Provincial Directorate of Environment, Urbanization and Climate Change. Submitted for your information and necessary action.

Abdullah AKTAŞ

For the Mayor (Belediye Başkanı a.)

Deputy Mayor (Belediye Başkan Yardımcısı)

Attachment: Court Decision (Mahkeme Kararı)

Action (Gereği):

To Erdemli Chief Engineering / Office (Erdemli Şefliğine)

Information (Bilgi):

To Mersin Provincial Directorate of Environment, Urbanization and Climate Change



T.C.
GENERAL DIRECTORATE OF NATURE CONSERVATION AND NATIONAL PARKS
7th Regional Directorate

Mersin Directorate of Nature Conservation and National Parks

Ref No / Sayı: E-31875023-335.01-25510297

Subject / Konu: Kazanlı Beach Plastic Waste (Kazanlı Kumsalı Plastik Atıklar)

Date / Tarih: 01/07/2026

TO DISTRIBUTION LIST
(DAĞITIM YERLERİNE)

Sea turtles are endangered species that we have committed to protect under the BERN (Convention on the Conservation of European Wildlife and Natural Habitats) Convention. In our province, the beach stretch from the Akdeniz Kazanlı Soda Industry Plant to the D-7 Drainage Canal constitutes the Kazanlı Sea Turtle Nesting Area.

Despite recurring beach cleanup operations in the mentioned nesting area since April 2026, positive results cannot be achieved due to plastic waste washed ashore continuously from the sea. It has been determined that the plastic waste washing ashore consists of shredded pieces ranging from a few millimeters to 5-10 cm. On the beach, this waste mixes with the sand and is dispersed around by wind and other natural factors. Sea turtles can ingest plastic debris in the sea, mistaking it for food, and plastic waste obstructing their digestive system leads to long-term mortality in turtles. On the beach, plastic waste adversely affects nesting and hatchling emergence. For this reason, marine litter washing ashore on Kazanlı beach must be cleaned up urgently both in the sea and on the beach (heavy machinery cannot be used due to the start of the nesting season) to prevent harm to natural life and wild animals.

Kazanlı Sea Turtle Nesting Beach is one of our sea turtle nesting areas under international monitoring, subject to regular reporting as a country, and regarding which an open case file exists against Türkiye within the framework of the BERN Convention. Considering the "Mersin Province Marine Litter Action Plan (2026-2029)", I respectfully request that necessary measures be taken regarding marine-sourced plastic waste in the Kazanlı Sea Turtle Nesting Area, and that cleanup operations on the beach be conducted or arranged to be conducted.

I respectfully submit for necessary action.

Savaş KUNT

Acting Director of Nature Conservation and National Parks
(Doğa Koruma ve Milli Parklar Müdürü V.)

Distribution (Dağıtım):

- To Mersin Metropolitan Municipality (Mersin Büyükşehir Belediye Başkanlığına)
- To Akdeniz Municipality (Akdeniz Belediye Başkanlığına)
- To Mersin Provincial Directorate of Environment, Urbanization and Climate Change (Mersin Çevre, Şehircilik ve İklim Değişikliği İl Müdürlüğüne)

**STATUS REPORT ON THE ACTIVITIES CONDUCTED AND SUPPORTED BY TURKİYE
ŞİŞE VE CAM FABRİKALARI A.Ş. – ŞİŞECAM CHEMICALS MERSİN KROMSAN PLANT IN
RELATION TO THE BERN CONVENTION CASE FILE**

July 2026

**Final Disposal of Hazardous Waste Temporarily Stored at the Kromsan Plant Site –
Neutralization of Legacy Technology Waste (ETAN)**

Process-related solid waste generated between 1984 and 1998 is currently stored within the plant site. The base, top, and side surfaces of the waste storage area have been lined with impermeable geomembrane materials. The waste is contained under conditions that ensure full containment and prevent any leakage, in order to maintain effective environmental control. Historical and current photographs of the site are provided in Figures 1 and 2.

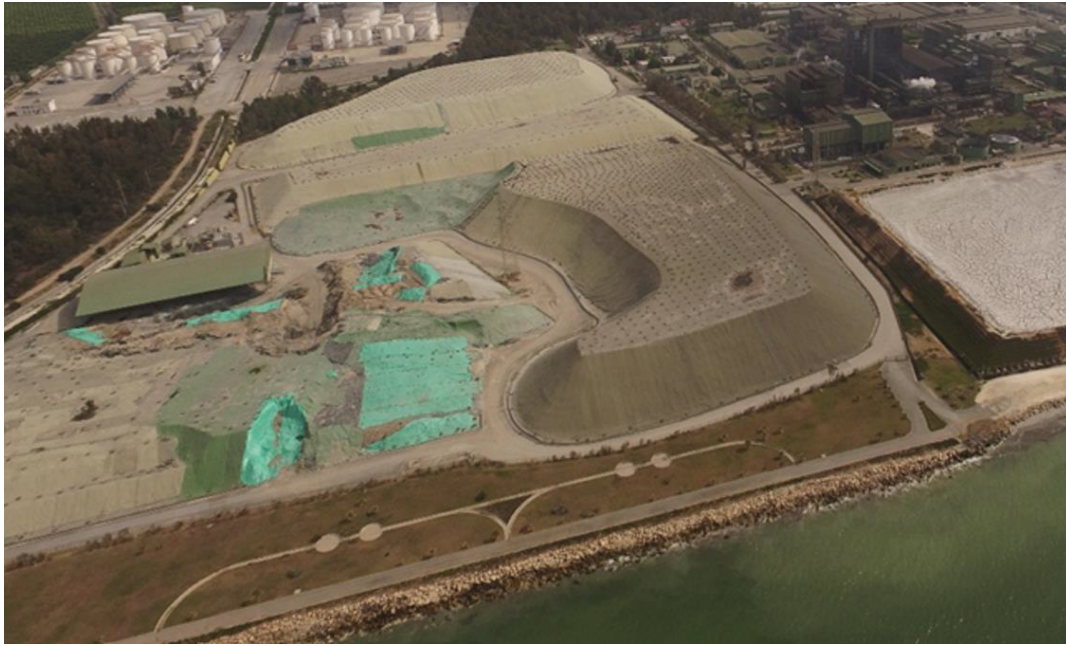


Figure 1: General View of the ETAN Facility as of 31 May 2016



Figure 2: ETAN Facility – General View (21 July 2026)

To process the waste classified as legacy technology waste and convert it into non-hazardous waste, a research and development programme was undertaken and the ETAN (Neutralization of Legacy Technology Waste) Facility was designed. The project was approved by the former Ministry of Environment and Urbanization, and the ETAN Facility became operational in November 2009.

The legacy technology waste stored at the ETAN site is neutralized through chemical treatment under high temperature and pressure conditions, thereby converting it into non-hazardous waste. The treated waste is disposed of at the Sariibrahimli Sanitary Landfill, which was developed in accordance with the site implementation project following the completion of the Environmental Impact Assessment (EIA) process and all required legal permitting procedures, in order to ensure its final disposal in compliance with the relevant landfill regulations.

Within the scope of the ETAN neutralization programme, activities are being carried out in Lots 1, 2, 3 and 5. At present, restoration works in Lots 1 and 2 have been completed and these areas have been brought back to ground level, while neutralization and restoration activities are continuing in Lot 3. Photographs showing the current condition of the ETAN lots are provided in Figure 3.



Figure 3: ETAN Site – Views of the Lots

Approximately 2,060,155 tonnes of waste have been treated and disposed of through the ETAN Facility, and it is estimated that approximately 1,326,161 tonnes of waste remain on site. The current ground-level elevation of the site is shown in Figure 4. Waste is also present below ground level; however, as the quantity of waste below ground cannot be determined precisely, the remaining waste volume is presented as an estimate.

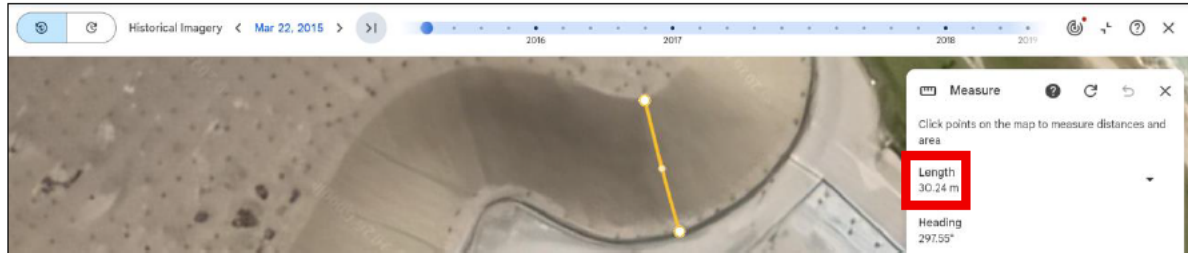


Figure 4: ETAN Site – View of the Upper Elevation Level

The ETAN Facility has an average annual waste treatment capacity of approximately 200,000 tonnes. Taking into account the periodic maintenance activities carried out at the facility, it is projected that all waste present at the site, both above and below ground level, will be treated and finally disposed of by 2031. The implementation schedule prepared in accordance with the relevant neutralization plan is provided in Annex 1.

1. Sariibrahimli II Sanitary Landfill

The Sariibrahimli II Sanitary Landfill is exclusively used for the disposal of chromium compound production process solid waste and ETAN solid waste generated by the Şişecam Chemicals Kromsan Plant.

Under this landfill project, two different categories of solid waste generated by the operations of the Şişecam Chemicals Kromsan Plant are disposed of in accordance with the applicable environmental legislation, thereby ensuring compliance with all relevant legal obligations. Only non-hazardous waste generated by the Şişecam Chemicals Kromsan Plant, namely chromium compound production process solid waste and ETAN solid waste, is accepted and disposed of at the landfill site.

The Sariibrahimli II Sanitary Landfill holds an Environmental Impact Assessment (EIA) Positive Decision dated 4 December 2013 (No. 3260), an official EIA title amendment letter dated 18 January 2021 (No. E-23645791-220.01-98108), and an EIA Positive Decision for Capacity Expansion dated 24 July 2026 (No. E-53785661-220.01). In addition, the site holds an Environmental Permit and Licence Certificate dated 26 March 2026 (No. 22579501-150/E.9366). A photograph of the landfill site is provided in Figure 5.



Figure 5. Sariibrahimli II Sanitary Landfill

2. Factory Coastal Area

The Soda and Kromsan Plants are located within the K4 coastal section covered by the Bern Convention case file. Photographs showing the coastal section of the relevant area are provided in Figures 6–10.



Figure 6. Pool Lighting



Figure 7. Daytime View of the Plant from the Coastal Area – 1



Figure 8. Daytime View of the Plant from the Coastal Area – 2



Figure 9. Night-time View of the Plant from the Coastal Area – 1



Figure 10. Night-time Views of the Soda Ponds Lighting

Due to night-time operational activities at the ponds, the lighting poles are 250 cm in height. All lighting fixtures are oriented towards the ponds, and no light spill from these lighting sources reaches the coastal area. Furthermore, as the waste ponds are located between the plant and the coast, no light spill from the plant is reflected onto the coastal area.

Work Schedule for the Disposal of Legacy Technology Waste at the Kromsan Plant

Implementation schedule		2026		2027				2028				2029				2030				2031			
		Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
1	ETAN Site – Above-Ground Area (Lots 1–3)																						
2	ETAN Site – Below-Ground Area																						
3	ETAN Site – Above-Ground Area (Lot 5)																						

Q1 : January - February – March

Q2 : April - May - June

Q3 : July - August – September

Q4 : October - November - December

T.C.
GOVERNORSHIP OF MERSİN
Provincial Directorate of Environment, Urbanization and Climate Change

Ref No / Sayı: E-27907008-145.01-15814876

Subject / Konu: BERN Convention - Kazanlı Sea Turtles (BERN Sözleşmesi-Kazanlı Deniz Kaplumbağaları)

Reference / İlgi: Your official letter dated 05/05/2026 and numbered E-31875023-335.01-24669876.

Date / Tarih: 10/06/2026

TO THE 7TH REGIONAL DIRECTORATE OF NATURE CONSERVATION AND NATIONAL PARKS

(Mersin Directorate of Nature Conservation and National Parks)

In your referenced letter, it was stated that as a result of the 45th Standing Committee Meeting held on December 8-12, 2025, containing the evaluations regarding the file titled "Türkiye: Recommendation No. 95 (2002) - Conservation of Sea Turtles in Kazanlı Beach" transmitted by the Secretariat of the Council of Europe Bern Convention, it was decided to reopen the case file against Türkiye; and the Standing Committee invited both the Complainant and the Government of the Republic of Türkiye to submit a report to the Bureau in September 2026; and accordingly, it was requested to transmit to your Directorate the reasons why the disposal of toxic waste belonging to the Kromsan plant has still not been completed despite the initial file opened against Türkiye regarding the Kazanlı beach within the scope of the BERN Convention and Recommendation No. 95 (2002) relating thereto, information regarding the quantity of hazardous and neutralized waste on the plant premises, when and through which methods the disposal operations of hazardous waste will be completed, and what protective measures have been taken to prevent the negative environmental impacts of this waste.

Regarding the matter, sodium bichromate and other chromium compounds are produced at the Türkiye Şişe ve Cam Fabrikaları A.Ş. Şişecam Kimyasallar Mersin Kromsan Plant operating in Kazanlı locality, Akdeniz District of our Province, and the process waste generated from the technologies used by the plant between 1984 and 1998 contains Cr⁺⁶ (hexavalent chromium) compounds and is therefore classified as "hazardous waste". This waste is temporarily stored within an area of 150,000 m² on the plant site, covered with an impermeable polyethylene cover material, and surrounded by drainage channels. Inside the plant, an ETAN (Neutralization of Old Technology Waste / Eski Teknoloji Atıklarının Nötralizasyonu) facility is present in order to convert old technology hazardous waste into "non-hazardous waste" form, and there are currently 1,326,161 tons of unprocessed hazardous waste on the plant premises.

In the ETAN (Neutralization of Old Technology Waste) facility, an average of 180 to 200 thousand tons of hazardous waste per year is converted into non-hazardous waste form through neutralization process, and disposed of by landfilling at the Class 2 landfill site (Lot-2) belonging to Türkiye Şişe ve Cam Fabrikaları A.Ş. Şişecam Kimyasallar Mersin Kromsan Plant located in Sarıbrahimli locality, Akdeniz district of Mersin province, which holds an Environmental Permit and License Certificate on "Landfill" obtained within the scope of the Regulation on Landfilling of Waste.

Boreholes have been drilled around the ETAN storage site for groundwater monitoring purposes, with a total of 4 observation wells, including 1 reference well. Groundwater samples are taken from the observation wells by the technical personnel of our Directorate at least twice a year and sent to the TÜBİTAK Marmara Research Center laboratory for analysis.

Upon the request of our Ministry, a report containing the opinion letter of the 6th Regional Directorate of State Hydraulic Works (DSİ) regarding the locations of the observation wells and their suitability for

sampling, as well as the physical and technical characteristics of the wells, along with the hydrological and hydrogeological characteristics of the temporary storage area and its surroundings, was prepared by the firm through the Department of Geological Engineering, Faculty of Engineering, Çukurova University.

Furthermore, the facility in question has been identified by our Directorate as a "Suspected Site" within the scope of the Regulation on Control of Soil Pollution and Point Source Contaminated Sites. The reports containing soil and groundwater analyses that the facility is obligated to prepare within the scope of the Regulation are reviewed and monitored by the Contaminated Site Evaluation and Monitoring Commission established under the chairmanship of our Directorate pursuant to the Governorship Approval dated 06/03/2023 and numbered 5866302, and the site monitoring process by the commission will continue even after the hazardous waste stored in the ETAN facility is completely processed and disposed of.

On the other hand, there is a wastewater treatment plant with a capacity of 100 m³/day for domestic wastewater generated by the facility and a wastewater treatment plant with a capacity of 1,200 m³/day for industrial wastewater; and the rainwater channels in the ETAN storage area are also connected to the industrial wastewater treatment plant.

The limit values of the water discharged from the wastewater treatment plant into the receiving environment are specified in the tables annexed to the Water Pollution Control Regulation, where the limit values for domestic wastewater are given in Table 21.1 and the limit values for industrial wastewater are given in Table 19 together with the parameters to be checked.

In addition to routine inspections, our Directorate conducts unannounced inspections where wastewater samples are taken from the discharge water of the relevant wastewater treatment plants to inspect whether pollutant parameters are below the limit values.

Submitted for your information and necessary action.

Hasan ALAN

Provincial Director of Environment, Urbanization and Climate Change
(Çevre, Şehircilik ve İklim Değişikliği İl Müdürü)

COOPERATION PROTOCOL FOR THE MERSIN PROVINCE, KAZANLI BEACH COASTAL EROSION DETERMINATION STUDY PROJECT

This protocol has been signed between the parties whose titles and addresses are specified below, in order to regulate mutual rights and obligations in line with the specified objective and scope.

1. PARTIES

First Party:

Title: General Directorate of Nature Conservation and National Parks, 7th Regional Directorate

Address: Sinanpaşa Mahallesi Kozan Cad. No:116 Yüreğir / ADANA

Telephone / Fax: **Tel:** 0322 3250763 | **Fax:** 0322 3250708

E-mail / KEP: E-mail: bolge7.dkmp@milliparklar.gov.tr | KEP: tarimveormanbakanligi@hs01.kep.tr

Second Party:

Title: Middle East Technical University, Institute of Marine Sciences

Address: Üniversiteler Mahallesi Dumlupınar Bulvarı No:1 06800 Çankaya / ANKARA

Telephone / Fax: **Tel:** 0324 5213434 | **Fax:** -

E-mail / KEP: E-mail: abal@metu.edu.tr | KEP: odtu@hs01.kep.tr

2. SUBJECT OF THE PROTOCOL

In Recommendation No. 95 (2002) of the "Convention on the Conservation of European Wildlife and Natural Habitats (BERN Convention)" within the scope of the case file opened against our country regarding the Kazanlı Sea Turtle Nesting Beach in our province, it was recommended to our country that "a coastal erosion monitoring program be established so that measures can be taken if needed." In order to fulfill the coastal erosion monitoring activity mentioned in the BERN Recommendation decision and to decide on appropriate preventive methods by determining the causes of existing erosion, the "Mersin Province, Kazanlı Beach Coastal Erosion Determination Study" will be carried out.

3. LEGAL BASIS

This protocol has been prepared based on the provisions of Land Hunting Law No. 4915, Fisheries Law No. 1380, Environment Law No. 2872, International Conventions (Convention on Biological Diversity, BERN Convention, CITES Convention, Barcelona Convention), the relevant Presidential Decree, and Circular No. 2009/10 on "Protection of Sea Turtles."

4. DEFINITIONS

The terms in this Protocol refer to the following:

- **Bern Convention:** Refers to the Convention on the Conservation of European Wildlife and Natural Habitats,
- **General Directorate:** Refers to the General Directorate of Nature Conservation and National Parks,
- **Regional Directorate:** Refers to the 7th Regional Directorate,
- **Administration:** Refers to the Mersin Provincial Directorate of Nature Conservation and National Parks,
- **Institute:** Refers to Middle East Technical University Institute of Marine Sciences,
- **Report:** Refers to the final report explaining the results of the study and the measures to be taken following the 12-month monitoring period and image analyses,
- **Orthomosaic:** Refers to a high-resolution, scaled, and continuous map image formed by geometrically correcting and combining drone and aerial photographs, offering a detailed and accurately measurable map of the earth's surface,
- **Global Navigation Satellite System (GNSS):** Refers to the infrastructure that precisely determines position, velocity, and time on earth using signals from satellites in Earth's orbit,
- **Methodology:** Refers to the set of systematic roadmaps and methods determining how a research, project, or academic study will be planned, conducted, and evaluated.

5. OBJECTIVE

The continuation of the generations of sea turtles (*Caretta caretta* and *Chelonia mydas*), which are species we are obliged to protect under our national legislation and international conventions to which we are party, primarily depends on the protection of the beaches they use for reproduction.

In particular, advancing coastal erosion on Kazanlı beach, where *C. mydas* turtles lay their eggs, leads to the loss of suitable dune area for turtles to lay their eggs. The study will enable the determination of the degree and causes of coastal erosion recently observed on Kazanlı beach, thereby identifying methods that can be used in future beach protection and erosion prevention efforts.

6. SCOPE OF THE ACTIVITY

Between 18/05/2026 and 30/05/2027 (1 year), activities including imaging with a small unmanned aerial vehicle (Drone) on Kazanlı Coast to monitor coastal erosion, processing these images, reporting the results, and notifying appropriate erosion prevention methods will be carried out.

7. DESCRIPTION OF WORKS TO BE PERFORMED WITHIN THE SCOPE OF THE ACTIVITY

1. Within the scope of the study, regular imaging will be conducted on Kazanlı Coast using a small unmanned aerial vehicle (Drone) at monthly intervals for 1 year.
2. Imaging will also be conducted in the same areas following extreme weather events such as strong winds and storms occurring in the region.
3. Initially, images will be taken at different altitudes and processed, and the resulting orthomosaic and digital elevation models will be compared to determine the altitude most suitable for the purpose. In subsequent months, the same measurement values will always be used.
4. Prior to the initial study, Ground Control Points (GCP) will be established at specific intervals on

Kazanlı Coast, at a minimum of 5 points where human disturbance is minimal, and locations and elevations will be determined with centimeter accuracy using a Global Navigation Satellite System (GNSS) receiver.

5. Images will be taken using a small unmanned aerial vehicle (Drone) along pre-determined routes and altitudes at monthly intervals.

6. The acquired images will be processed at the METU Institute of Marine Sciences to generate orthomosaic images and digital elevation models.

7. The obtained images and models will be compared with each other to determine the degree of coastal sedimentation transport and erosion.

8. At the end of the study, it will be reported whether coastal erosion exists, and if so, in which areas and to what extent, and potential sources of erosion will be investigated.

9. Utilizing literature data as well, methods beneficial for preventing erosion for Kazanlı beach will be communicated to the Administration.

8. STUDY TEAM

The study will be carried out jointly by teams from the Mersin Directorate of Nature Conservation and National Parks and researchers from the METU Institute of Marine Sciences. Imaging operations on Kazanlı Coast will be conducted monthly by teams from the Mersin Directorate of Nature Conservation and National Parks, while data processing and reporting will be performed by researchers from the METU Institute of Marine Sciences. Literature data utilized will be included in the report.

9. RIGHTS AND OBLIGATIONS OF THE PARTIES

9.1. Obligations of the Regional Directorate:

9.1.1. Procurement of one unmanned aerial vehicle (Drone) and one laptop computer to be used for data processing under the project will be undertaken by the Regional Directorate, and monthly Drone shooting (imaging process) on the beach for 12 months from the start of the study will be performed by personnel of the Mersin Directorate of Nature Conservation and National Parks. Following major storms that may occur in the region, additional drone shooting will be performed to determine the impact of the storm on the coast.

9.1.2. Daily allowances (per diem) for Ministry personnel participating in field work shall be covered by the Ministry pursuant to the relevant article of Allowance Law No. 6245, while daily allowances for experts/individuals who are not Ministry personnel shall be covered by their respective institutions.

9.1.3. Secretariat services for necessary official correspondence within the scope of the protocol shall be handled by the Mersin Directorate of Nature Conservation and National Parks.

9.1.4. The transportation vehicle required for field work shall be provided by the Administration.

9.1.5. A sufficient number of personnel shall be provided by the Administration for field work.

9.1.6. Administration monitoring personnel shall share the images obtained during unmanned aerial vehicle (Drone) shootings with Institute experts for use in reporting.

9.1.7. Required written permissions shall be obtained by the Administration from the administrative authorities responsible for the region before conducting imaging with the unmanned aerial vehicle (Drone).

9.2. Obligations of the Institute:

9.2.1. Throughout the study period, the Institute shall conduct research and evaluation using scientific methods on the subject matter and shall be responsible for providing experts.

9.2.2. The Institute shall notify the Administration of the name, surname, title, and contact information of the personnel assigned by the University within 1 month at the latest following acceptance of the protocol.

9.2.3. Experts shall provide practical field training to technical personnel of the Mersin Directorate of Nature Conservation and National Parks prior to the study regarding monitoring methodology and unmanned aerial vehicle (Drone) usage methods, and training shall be renewed as needed. The training shall explain how Drone shootings should be conducted, how flight points should be determined, and how data transfer from the Drone should be carried out.

9.2.4. Data obtained from monitoring shall be processed by experts to create orthomosaic images and digital elevation models, compared with previous period data, and changes on Kazanlı Coast based on scientific grounds, current erosion rate and potential sources, and method recommendations to prevent erosion shall be reported to the Administration based on the data obtained.

9.3. Mutual Obligations:

9.3.1. Pursuant to Occupational Health and Safety Law No. 6331, protocol parties are responsible for the safety of their own personnel (faculty members, instructors, students, etc.) whom they employ.

9.3.2. Parties shall cooperate throughout the protocol period; drone shooting days shall be jointly decided, and shooting locations shall be jointly determined in the field environment.

9.3.3. All outputs resulting from the work (data, photographs, maps, etc.) shall be delivered to the Administration within 1 (one) month following completion of the work.

9.3.4. The right to publish data obtained within the scope of the work in written and visual media and to use it in scientific publications is subject to the permission of the General Directorate. All parties must review every article or report prior to publication. Publications shall include the names of those from the parties who contributed scientifically. Printed materials produced from the data shall feature both the General Directorate of Nature Conservation and National Parks logos and the METU Institute of Marine Sciences logos together.

10. FINANCIAL PROVISIONS

The laptop computer and drone (to be registered in the Directorate's fixture inventory) to be used under this project shall be procured by the Regional Directorate and used by Administration personnel.

Transportation of Administration and Institute personnel to the field shall be provided by the Administration, and maintenance, repair, and related expenses thereof shall be covered from the Administration's budget. Evaluation, analysis, and reporting at the end of the study regarding images obtained from Drone shootings shall be carried out by the Institute free of charge. Reports shall be submitted to the Administration on CD media.

11. CONFIDENTIALITY AND INTELLECTUAL PROPERTY RIGHTS

Matters regarding intellectual property rights are specified below:

1. Ownership of data collected, content produced, and materials generated within the scope of this protocol belongs to the General Directorate. However, the Institute holds intellectual property rights in the processes of processing this data through scientific methods, reporting it, and converting it into scientific outputs. Parties undertake to respect each other's intellectual property rights within the framework of Law No. 5846 on Intellectual and Artistic Works and relevant legislation.
2. The Institute may not share, transfer, or disclose to the public any data obtained within the scope of the protocol without written permission or approval from the Regional Directorate.
3. **Protection of Personal Data (KVKK):** Parties undertake to act in accordance with Personal Data Protection Law No. 6698 ("KVKK"). Regarding personal data transferred to each other within the scope of the protocol (volunteer lists, personnel information, etc.), parties accept and undertake that they will: i) process it solely for the purpose of executing the services provided in the protocol, ii) not disclose it to others in violation of KVKK provisions nor use it outside the processing purpose, iii) ensure that their own personnel and volunteers also comply with this confidentiality.

12. STUDY DURATION AND REPORT

The project shall commence on the date the protocol is signed by the parties, and following 12 months of imaging operations, shall be completed by the end of 14 months from the start. Project reports shall be submitted to the Mersin Directorate of Nature Conservation and National Parks in accordance with the work plan, as an interim report at the end of the 6th month of the study, and final reporting within 2 months after obtaining project result data, and shall terminate on 31/07/2027, the last business day of the 14th month following the signing of the Protocol. In the final report, the most suitable methods to prevent coastal erosion for Kazanlı Beach based on the data obtained (supported by literature studies and scientific data) shall be reported.

Upon expiration of the duration, a new protocol may be executed with mutual agreement of the parties.

13. AMENDMENTS TO THE PROTOCOL

If one of the parties proposes an amendment to the protocol, it shall notify the other party in writing at its address. Within 15 business days following receipt of written notification, amendments may be made by an additional protocol to be drawn up with written mutual consent of the parties, provided it does not deviate from the main purpose of the protocol.

14. BREACH AND TERMINATION OF THE PROTOCOL

Each party may unilaterally terminate the protocol by stating its justification in writing in the presence of rightful grounds, such as breach of protocol provisions or cooperation becoming practically impossible to maintain. Termination notice must be served in writing to the other party at least 30 days in advance. At the end of this period, the protocol shall be deemed automatically terminated.

In the event of termination, work and obligations performed by the parties up to the date of termination shall be concluded within the framework of mutual good faith, and parties shall inform each other regarding financial and legal liabilities that may arise.

In case of termination, disposition of all data and results obtained from the project belongs entirely to the General Directorate, and University personnel may not use this data and results for any purpose, including publication, without permission. Otherwise, the Administration may exercise disposition as it deems necessary.

15. DISPUTE RESOLUTION AND COMPETENT COURT

In the event that disputes arising from this protocol cannot be resolved amicably through consensus, "Adana Courts" shall be competent to resolve such disputes.

16. ADDITIONAL PROTOCOL (If required)

Where amendments to protocol provisions or addition of new provisions are required, parties may draw up an additional protocol in writing with mutual consent.

Additional protocols form an integral part of the main protocol and, unless specified otherwise in the additional protocol, shall be executed in accordance with provisions of this protocol.

17. ENTRY INTO FORCE

This protocol consists of 18 (eighteen) articles and 7 (seven) pages, and has been signed by the parties in 3 copies on 18/05/2026 and entered into force.

18. SIGNATURES First Party

Name Surname: Abdullah ALİOĞLU

Title: Regional Director

Signature: [Signed]

Second Party

Name Surname: Prof. Dr. Barış SALİHOĞLU

Title: Institute Director

Signature: [Signed & Stamped]

**T.C.
GENERAL DIRECTORATE OF NATURE CONSERVATION AND
NATIONAL PARKS**

7th Regional Directorate

Mersin Directorate of Nature Conservation and National Parks

Ref No / Sayı: E-31875023-335.01-22871218

Subject / Konu: Sea Turtles (Deniz Kaplumbağaları)

Date / Tarih: 07/01/2026

**TO MERSIN PROVINCIAL DIRECTORATE OF NATIONAL EDUCATION
(MERSİN İL MİLLİ EĞİTİM MÜDÜRLÜĞÜNE)**

Sea turtles are endangered species that we protect under international conventions and our national legislation. In our province, Kazanlı Beach in Akdeniz District is an important nesting area for sea turtles, particularly the green sea turtle (*Chelonia mydas*).

Kazanlı Sea Turtle Nesting Area is monitored within the scope of the BERN (Convention on the Conservation of European Wildlife and Natural Habitats) Convention, to which we are a party, and regular reporting is submitted to the BERN Secretariat of the Council of Europe in accordance with recommendation decisions. However, during recent discussions, the Secretariat emphasized that information and awareness efforts regarding the Kazanlı Sea Turtle Nesting Beach were insufficient. In this context, our institution intends to conduct an educational program during the 2026 Academic Year covering primary, middle, and high school levels in order to raise awareness among students regarding the protection of endangered species. The training is planned to be conducted in schools located primarily in Kazanlı Neighborhood, Akdeniz District, and its immediate surrounding area, covering one class hour and incorporating a visual presentation.

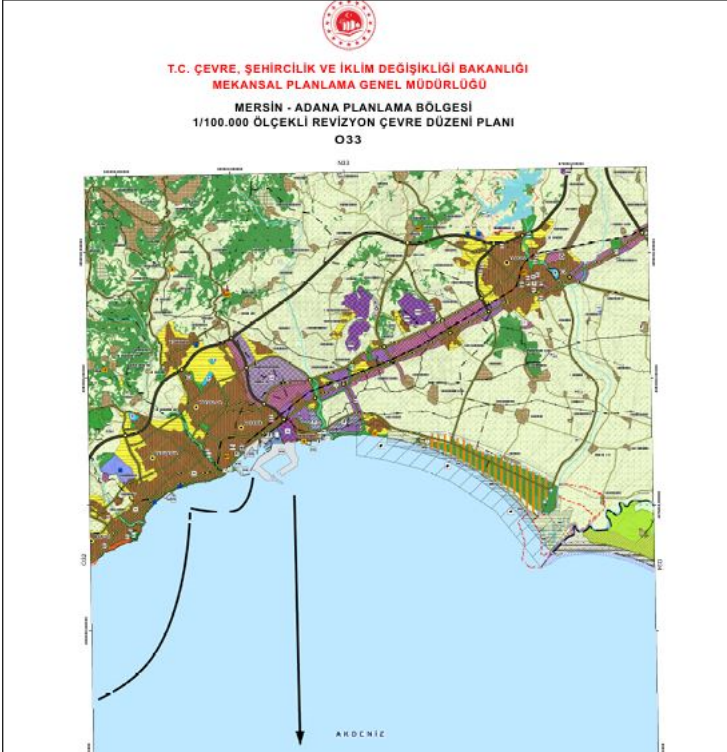
I respectfully request that appropriate schools and training dates for delivering education on sea turtles be determined and communicated to our institution along with their contact information for necessary action.

Savaş KUNT

Acting Director of Nature Conservation and National Parks
(Doğa Koruma ve Milli Parklar Müdürü V.)







ŞİŞECAM CHEMICALS
PROGRESS REPORT – JUNE 2026
ACTIVITIES CARRIED OUT AND SUPPORTED BY TÜRKİYE ŞİŞE VE
CAM FABRİKALARI A.Ş. ŞİŞECAM CHEMICALS MERSİN KROMSAN
PLANT CONCERNING THE BERN CONVENTION
Final Disposal of Hazardous Wastes Temporarily Stored at the
Kromsan Plant Site – ETAN

Kromsan Plant is the only manufacturer among global chromium compound producers that converts process waste—known as chrome ore processing residue—into the non-hazardous waste class. Process solid waste generated between 1984 and 1998 is stored at the plant site. The bottom, top, and surfaces of the waste are covered with impermeable geomembrane lining materials. To ensure environmental control, the wastes are contained with complete sealing capabilities. The perimeter of the storage area is entirely surrounded by rainwater channels, which are connected to the Kromsan wastewater treatment plant via pumps and pipelines to mitigate any potential contamination. To process this waste, defined as legacy technology waste, and classify it as non-hazardous, the ETAN (*Legacy Technology Waste Neutralization*) plant project was designed through R&D activities, approved by the Ministry of Environment and Urbanization, and commissioned as of November 2009.

The ETAN Plant is an exemplary environmental application developed and successfully operated through Kromsan's R&D activities. This type of waste generated during chromium production had not previously been subjected to a treatment process by any chromium manufacturer, nor had its final disposal as non-hazardous waste been achieved. The implementation of this process, developed as a result of Kromsan's R&D efforts, is a world first.

Legacy technology waste stored in the ETAN site is neutralized through chemical processes under high temperature and pressure, bringing it into the non-hazardous waste category. The neutralized waste is disposed of at the Sarıbrahimli Sanitary Landfill Site, which has been developed in accordance with the field application project following the completion of the EIA (Environmental Impact Assessment) and legal permitting processes for final disposal under landfill regulations. Within the scope of neutralization activities on the ETAN site, works are being conducted in Sites No. 1, 2, 3, and 5. Currently, Sites No. 1 and 2 have been lowered to ground level, while work continues on Site No. 3.

In this context, approximately 2,060,155 tons of waste have been processed and disposed of at the ETAN plant, and it is estimated that a total of 1,326,161 tons of waste remain on site. Photos of the site are provided in ANNEX-1.

Kromsan Plant Industrial Wastewater Treatment Plant

Wastewater generated during the production of chromium compound chemicals is treated at the Kromsan Plant industrial wastewater treatment plant, ensuring its discharge in compliance with environmental regulations. The industrial wastewater treatment plant, which is audited by regulatory authorities, holds an "Environmental Permit."

Under the scope of the environmental permit, wastewater samples are collected twice a month from the wastewater treatment plant for monitoring purposes and analyzed by accredited laboratories designated by the Ministry of Environment, Urbanization and Climate Change. Wastewater analysis results are shared in ANNEX-2.

Measures Taken Regarding Lighting

Shading/shielding has been implemented on lighting fixtures located in the sea turtle nesting area.

Disposal and Permitting Processes

Pursuant to our application dated 06.11.2012 and numbered SEÇ-637 regarding the ETAN Plant, a temporary hazardous waste storage permit valid until the end of 2023 was granted by the former Provincial Directorate of Environment and Urbanization on 28.12.2013. It was evaluated that the waste quantity specified in the temporary storage permit did not cover the subsurface waste under the conditions of that period, and the total waste quantity exceeded the amount specified in the permit. On the other hand, periodic maintenance, repair, and cleaning activities have been performed regularly at the facility, which has been in operation since 2009. However, to enhance operational safety, extend the service life of machinery and equipment, prevent potential breakdowns in production processes, and improve the overall performance and efficiency of the facility, a comprehensive heavy maintenance, repair, and cleaning effort was required. Additionally, seasonal conditions associated with rainy periods caused waste disposal operations to take longer than scheduled.

Since the waste located on site could not be completely disposed of within the storage permit duration, an application was submitted to the Provincial Directorate of Environment, Urbanization and Climate Change via our letter dated 08.11.2023 and numbered 31531 for a permit duration extension. However, pursuant to the letter from the General Directorate of Environmental Management dated 15.03.2024 and numbered 8912415, although the pre-disposal neutralization process performed on the site waste is an in-plant operation, it was determined that a licensing process must be executed to track the quantity of incoming waste and remaining on-site waste, evaluating this activity under the scope of a hazardous waste pre-treatment license according to the *Regulation on General Principles of Waste Pre-treatment and Recovery Facilities*. Consequently, the hazardous waste pre-treatment licensing process was initiated.

Within the scope of the hazardous waste pre-treatment licensing process, it is anticipated that waste disposal will be completed by dispatching the waste to the sanitary landfill facility.

Acting with the awareness of a responsible producer, our company fully performs all duties regarding the final disposal of hazardous wastes originating from legacy technologies used in the past and subsequently replaced. Carried out not only as a legal obligation but also as a social responsibility, our efforts to continue this project and finalize the ultimate disposal of legacy technology wastes are conducted with utmost care and diligence.

ANNEX-1

Photo 1: General View of Site No. 1

Photo 2: General View of Site No. 2

Photo 3: General View of Site No. 3

Photo 4: General View of Sites No. 1 and 3





**ŞİŞECAM CHEMICALS
ŞİŞECAM KİMYASALLAR**

To:

T.C.GENERAL DIRECTORATE OF NATURE CONSERVATION AND NATIONAL PARKS- 7th
Regional Directorate Mersin Directorate of Nature Conservation and National Parks

Subject / Konu: Re: Kazanlı Sea Turtles (Kazanlı Deniz Kaplumbağaları Hk.)

Reference Letter / İlgi: Official letter of T.C. General Directorate of Nature Conservation and National Parks, 7th Regional Directorate, Mersin Directorate of Nature Conservation and National Parks dated 05/05/2026 and numbered E-31875023-335.01-24669876.

Date / Tarih: 23/06/2026

In your referenced letter, it was requested:

"to urgently report to your Directorate the reasons why the disposal of toxic waste belonging to the Kromsan plant has still not been completed despite the initial file opened against Türkiye regarding the Kazanlı beach under the BERN Convention and Recommendation No. 95 (2002) relating thereto; the quantity of hazardous and neutralized waste on the plant premises; when and through which methods the disposal operations of hazardous waste will be completed; and what protective measures have been taken to prevent the negative environmental impacts of this waste."

In this context, the report regarding the current status of Türkiye Şişe ve Cam Fabrikaları A.Ş. Şişecam Kimyasallar Mersin Kromsan Plant is presented in the attachment.

Submitted for your information.

Sincerely, **GÜLİZ KAVRAMA BATMAZ**
Quality Manager (Kalite Müdürü)

DR. BURAK BASTACIOĞLU
Kromsan Plant Director (Kromsan Fabrika
Müdürü)