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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Bureau of the Standing Committee**

18-19 March 2024  
Strasbourg

**Open case-file: 2019/05**

**Habitat destruction in Mersin Anamur Beach (Türkiye)**  
**- REPORT BY THE COMPLAINANT -**

*Document prepared by the  
Mersin Environment and Nature Association Deputy (MERCED)*

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**UPDATE REPORT BY THE NGO****Marine Turtle Conservation in the Mediterranean****LOGGERHEAD SEA TURTLE (*CARETTA CARETTA*) &  
SOFT SHELL NILE TURTLE (*TRIONYX TRIUNGUIS*)  
CONSERVATION MONITORING IN ANAMUR, MERSIN, TÜRKİYE****8 February 2024**

*Document prepared by*  
**MERÇED - Mersin Environment and Nature Association Deputy**  
*& presented by*  
**MEDASSET - the Mediterranean Association to Save the Sea Turtles**

*for the Spring Bureau Meeting of 2024 the Contracting Parties to the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)*

MERÇED and MEDASSET hereby submit an update report to the Spring Bureau Meeting of the Bern Convention (March 18-19, 2024) on the conservation status of loggerhead sea turtle (*Caretta caretta*) nesting beaches and habitats of the Nile soft-shell turtle (*Trionyx triunguis*) in Anamur, Türkiye.

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**1. SUMMARY**

There is a very minor update since our previous report submitted in October 2023 (T-PVS/Files(2023)42) and the decision of the last Standing Committee for the nesting beaches in Anamur. There is no communication and collaboration between the authorities and local NGOs, regarding the ongoing or planned works that affect sea turtle nesting beach.

No rehabilitation occurred at Karaagac Beach. The Ministry of Internal Affairs's Inspector came to Anamur to investigate the details of our complaint regarding the illegal Picnic Area Construction. The Investigator decided "there is no need for further investigation into this complaint." MERÇED started the objection process to this decision.

The "Additional Beach Development Project" construction did not start yet this winter, as was initially published. The projected "development area" is larger than the area already completed. The reasons for the delay are not known.

All remaining violations previously reported continued and no rehabilitation or mitigation has taken place. The onsite inspection, as decided by the Bureau, is needed more than ever.

Details for the above are provided in "Annex 1 – Detailed Report".

***MERÇED and MEDASSET call upon the authorities to:***

- Complete the rehabilitation and remove soil, trees, and concrete infrastructure placed on the nesting beach during the “Beach Arrangement Project” Phase 1 and 2 in violation with Coastal Law, Circular # B.18.0.DMP.0.01.03, and international agreements.
- Provide all location information of the “Beach Arrangement Project” including the coordinates of the area, length of the beach occupied, and distance from the shoreline (for the completed phases and planned future phases.)
- Perform an assessment for the restoration status of Karaagac Beach.
- Dismiss the zoning plan change in the Aquapark region affecting the nesting beach, which has been approved by the Municipality of the Anamur and the Mersin Metropolitan Municipality.
- Ensure local authorities and local businesses comply with Turkish National law (Circular # B.18.0.DMP.0.01.03) and the Bern Convention’s Recommendation No. 66 (1998).
- Enforce and penalize perpetrators for violations of the protection measures as stated in the National legislation circular # B.18.0.DMP.0.01.03 (e.g. vehicle access, sand extraction, business expansions, light, and noise pollution, etc.)
- Stop illegally taking sand from the beach.
- Install permanent barriers to prevent illegal vehicle access to the beach.
- Allocate more staff and/or work with a university to ensure efficient monitoring and caging.
- Collaborate and communicate with the local NGOs for ongoing and future changes.
- Prevent further stonewall construction along the Dragon River that results in irreversible damage to the habitat and severely impacts the nesting activity and habitat of the *Trionyx triunguis* turtles.
- Cancel the geothermal drilling license, which covers the nesting beach, until an EIA process by an independent scientific team evaluates its impact.
- Retain the previous protection status of the densest nesting area between Dragon Rivulet, Mamure Castle, and the Pullu Forest Camp, which has changed with a new Circular that was published in the Government Official Gazette dated 29 July 2023 (number 32263) and further limits the protected area.
- Publish the official sea turtle nest numbers marked by the Nature Conservation and National Parks official for each section of the Anamur nesting beach (for the past 5 years and future years)

***MERÇED and MEDASSET call upon the Bern Convention Standing Committee to:***

- Encourage authorities to urgently implement the necessary actions listed above.
- Proceed with an onsite inspection as has been decided.

## **ANNEX 1: DETAILED UPDATE REPORT OF 2024 FOR ANAMUR SPA, TURKEY, MAPS & PHOTOGRAPHS**

### **DETAILED REPORT**

Updates for the previously listed issues are presented under the following headings.

#### **1. Illegally filled site in Karaağaç Picnic Area**

##### **Current Status:**

No progress was made regarding the rehabilitation of the beach during this reporting period. However, there is an update regarding the legal situation.

At the end of the investigation carried out by the Ministry of Internal Affairs's Inspector, it was decided, "there is no need for further investigation into this complaint." MERÇED started the objection process to this decision by applying to the Council of State. Authorities and inspectors are trying to prevent municipal officials from being penalized for the illegal picnic area construction.

##### **History of the issue:**

When the Picnic Area was first built on the beach in 2019, the Regional Directorate of Nature Conservation and National Parks of the Ministry of Agriculture and Forestry decided that the Municipality must rehabilitate the beach and remove the illegally planted trees and soil no later than 16.07.2019. The Municipality was also fined 180.489 Turkish Lira (approx. 22.846 Euros as of 2019 Euro exchange rate).

The Municipality did not rehabilitate the beach, despite the official decision. However, during the winter season, trees were uprooted due to strong waves. Thereupon, the municipality was forced to remove most of the soil they dumped on the beach but did not rehabilitate and return the area to its natural state. Dumped soil, water pipelines and debris remained on the beach. Additionally, the stone wall illegally built remained alongside the Sarisu Creek. Moreover, since the entrance of the road leading down to the beach along the stream is not blocked for vehicle access, many vehicles enter the beach and the road leading to the beach. The nesting beach is littered with broken drink bottles thrown from vehicles.

The Ministry of Internal Affairs's Inspector was appointed at the end of September 2023 regarding the criminal complaint filed by MERÇED against the authorities of the Anamur Municipality for the above issues. The inspector examined whether the decisions of the Directorate of Nature Conservation and National Parks (rehabilitation and payment of fines) were implemented.

After the inspector's visit, Municipality workers smoothed the unevenness on the beach by pouring sand over the remaining debris and soil so that it is not visible.

#### **2. Beach Development Project**

No additional construction took place yet this winter, although initially published project area plans describe a larger area than the area already completed. The reasons for this welcome delay are not known yet but may be due to the upcoming elections that will occur this spring or due to financial reasons.

No rehabilitation of the existing violations caused by the previous two development phases and described below, has occurred. Tons of soil were poured into the beach and dune areas are filled with stones and concrete, creating artificial landscape areas. Trees were planted on the beach; they are irrigated and fertilized regularly. Excessive water flowed on to the beach. These illegal activities continued during the nesting season, and the authorities remained silent and did not fulfill their inspection duties.

The facilities built by the municipality and rented to the businesses continue to damage the beach. Due to these facilities and the illuminated walkways and gazebos built, human pressure increased and sea turtles are now nesting less than before. Due to the lack of personnel responsible for monitoring and protecting the nests, not all nests could be caged during the last nesting season and no accurate data regarding the number of nests was provided.

The single officer working under the Directorate of Nature Conservation and National Parks, tasked with monitoring the nesting beach area is insufficient to detect, prevent and penalize violations. As a result, sun loungers/umbrellas are placed too close to the shoreline and not collected at night, there is shower water runoff, vehicles enter the beach, and visitors light fires during the night and play loud music.

### **3. Sand extraction**

No evidence was observed that sand was extracted the last few months. However, sand extraction had previously been observed almost every year since the case file was first reported in 2019.

### **4. Illegal vehicle access to the beach**

No progress has been made in preventing illegal vehicle entrance to the beach. It is still possible to enter the beach by vehicles from many points of the beach. Figure 1 depicts car tire tracks on the beach.

### **5. Light and Sound Pollution**

There has been no progress in preventing light and sound pollution.

The lights of the facilities are kept on and loud music is played until late at night. The lighting of parks and walking paths within the scope of the Beach Development Project, and the street lamps close to the beach and the interior lighting of apartment complexes are kept on throughout the night. The tones and intensities of the lights are quite high and their positions are incorrect. The lights reflect directly onto the nesting beach. Additionally, fireworks and loud music still occur at parties and weddings.

### **6. Expanding businesses on the nesting beach:**

There are many facilities (restaurant, beach club, cafe, bungalow accommodation etc.) on the beach and they increase their occupation every year since there is no authority stops them.

Karaağaç Beach & Restaurant in the Karaağaç region is one of these businesses. They continue to plant hundreds of trees, irrigate and fertilize plants, build bungalow houses, and place camellias, sun loungers, umbrellas, tables, etc. on the beach within 20-30 meters away from the shoreline. The authorities remain silent about the company's increasing number of bungalow houses, camellias, beach furniture and trees every year. The business area is within the 1st Degree Protection Zone. Photographs are provided in previous reports and company's Instagram account (Ref1: <https://www.instagram.com/karaagacbeach/> )

This business is not the only one that occupies the nesting beach. There are many businesses rented as beach club in the Beach Development Project area.

Also, there are many businesses in the Iskele region that occupy the beach. Some of the recent photographs of this region are given in Figure 2.

The beach furniture management of all these facilities does not comply with any rules. They keep beach furniture at the beach during the day and night. They all create huge amounts of noise and light pollution till late hours.

All these activities reduce the sea turtles' chances of laying eggs and nesting.

## **7. Stone wall built alongside the Dragon Rivulet**

As stated in previous reports Dragon River is home to the African (Nile) Softshell Turtle (*Trionyx triunguis*). Last year, a 1.400 m stone wall built alongside the left and right of the Dragon River. The wall slope is steep, the stones pieces are too big and there are gaps in between the stones. This situation causes no turtle species to be able to climb up for nesting.

The stone wall built along the Dragon Rivulet has completely destroyed the African Softshell Turtle nesting habitat as these turtles mainly nest on sand banks near Rivulets. Immediate measures must be taken to rehabilitate the banks to their natural state.

The below text is retrieved from the website of the governmental State Hydraulic Works (DSI) institution, who carried out the construction of this wall. (Ref2: <https://www.dsi.gov.tr/Haber/Detay/8861>)

*The works within the scope of Mersin Anamur Dragon River and Çeltikçi Stream Reclamation Part 1 work were completed by DSI, both reducing flood risks and giving the district a value-adding appearance. DSI General Manager Mehmet Akif BALTA expressed their satisfaction with completing the project and he emphasized that DSI investments in Anamur will continue to increase.*

*General Manager Mehmet Akif BALTA stated that improvement work was carried out for 1400 meters on the right and left side of the river, starting from the sea and towards the inner parts of the district; “As part of our work, we completed the production of 1400 meters of stone fortifications and covered concrete on the right and left side. In addition, within the scope of security measures, we also manufactured wrought iron railings in a way that suits this area.” he said.*

Map of the area is presented in Map 3 and recent photos of the stone wall are presented in Figure 3.

## **8. Insufficient Monitoring and Protection Status**

There is no regular and standard monitoring study on the Anamur nesting beach. The Nature Conservancy and National Parks have assigned only one person for nest marking and caging. However, considering the 12+ km length of the beach and the density of the nesting, there is an urgent need for more staff as one person is insufficient. Monitoring, conservation, and raising awareness work should be carried out with additional professionals / academic support.

Since there is no nesting activity in the winter season, no progress is observed on this issue in this reporting period.

And no information is shared by the authorities that additional monitoring and protection measures will be taken for the upcoming season.

## **9. Zoning plan change**

There is no progress for this update reporting period on this issue. No information was provided to MERÇED or NGOs, despite our requests.

As stated in the previous reports, there was a zoning change plan covering some of the nesting beach area in the Aquapark region. MERÇED members and many citizens objected to this plan.

## **10. Geothermal Drilling License**

The lawsuit MERÇED filed to the Mersin 1st Administrative Court (file numbered 2023/165 E) against the drilling license for the Geothermal Power Plant project is at the expert discovery stage. The previously taken expert discovery decision was postponed due to the plaintiffs' request for recusal, and a new discovery decision has not been taken by the Court yet.

## **11. New Circular on Change of Conservation Status**

No update occurred for this reporting period on this issue. No information was provided by authorities to MERÇED or NGOs, despite our requests.

### **History of the issue:**

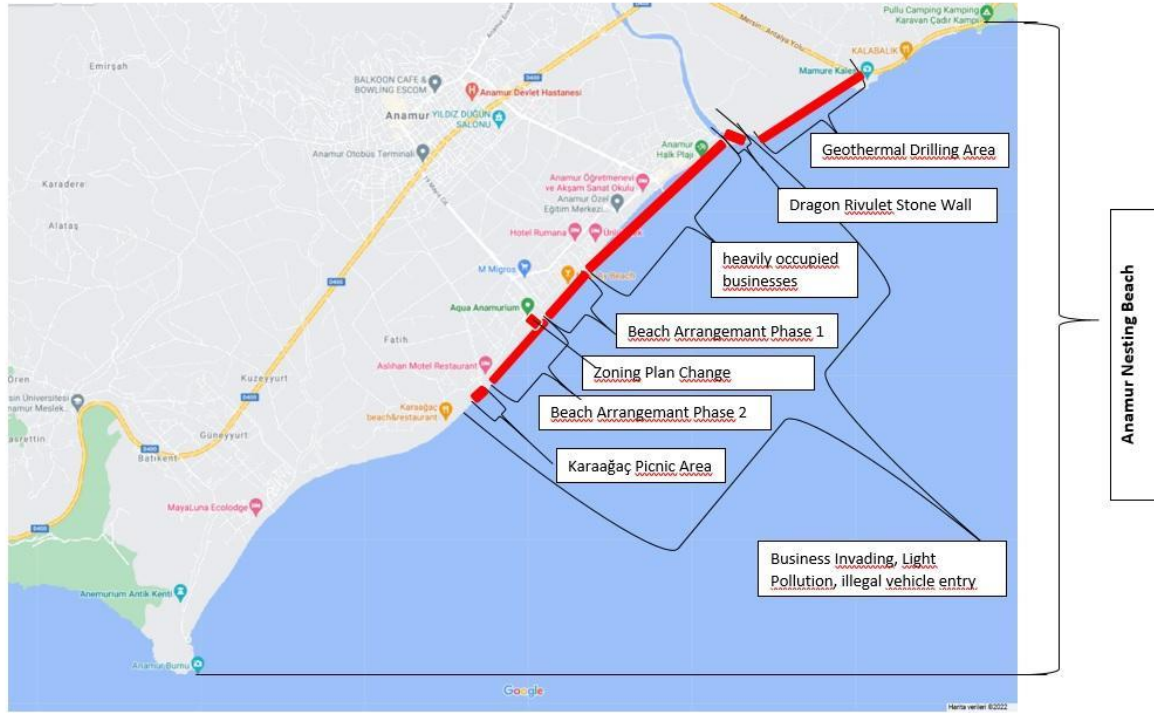
The region between Dragon Rivulet, Mamure Castle, and the Pullu Forest Camp has the densest number of nests since it was protected from human activity for a long time.

The conservation status of this region is reorganized by the Government Official Gazette dated 29 July 2023 and number 32263. (Ref3: <https://www.resmigazete.gov.tr/eskiler/2023/07/20230729-11.pdf> )

The new conservation status of the area is presented in Map 4. (Ref4: Site Management System Web Page - <https://says.csb.gov.tr/> ). MERÇED members visited related Government offices to request data about the previous conservation status and area coordinates. However, officials did not share any information.

It is stated in the referenced press news that, this decision is made to narrow down the protected area as a preparation for future zoning change requests to allow daily usage facilities. With this rearrangement, the natural protected area on the east of the Mamure Castle, is excluded from the scope of protection. (Ref 5: Local Newspaper News Link :

<https://www.mersinhaberci.com/habermobil/46251/anamurda-korkulan-oldu.html> )

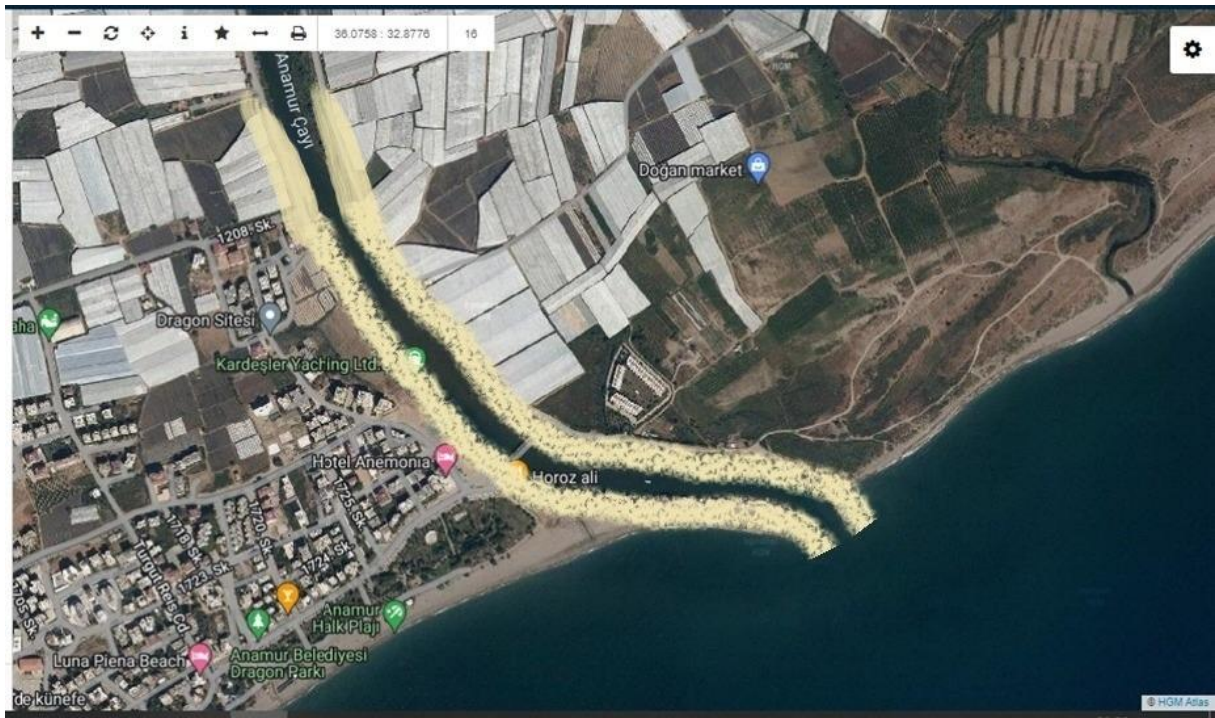
**MAP and PHOTOGRAPHS**

**Map 1)** Map displaying the coastline of Anamur and the areas affected by major threats to habitat destruction for coastal development plans and tourism activity on the sea turtle nesting beaches - © MERÇED 14 February 2022



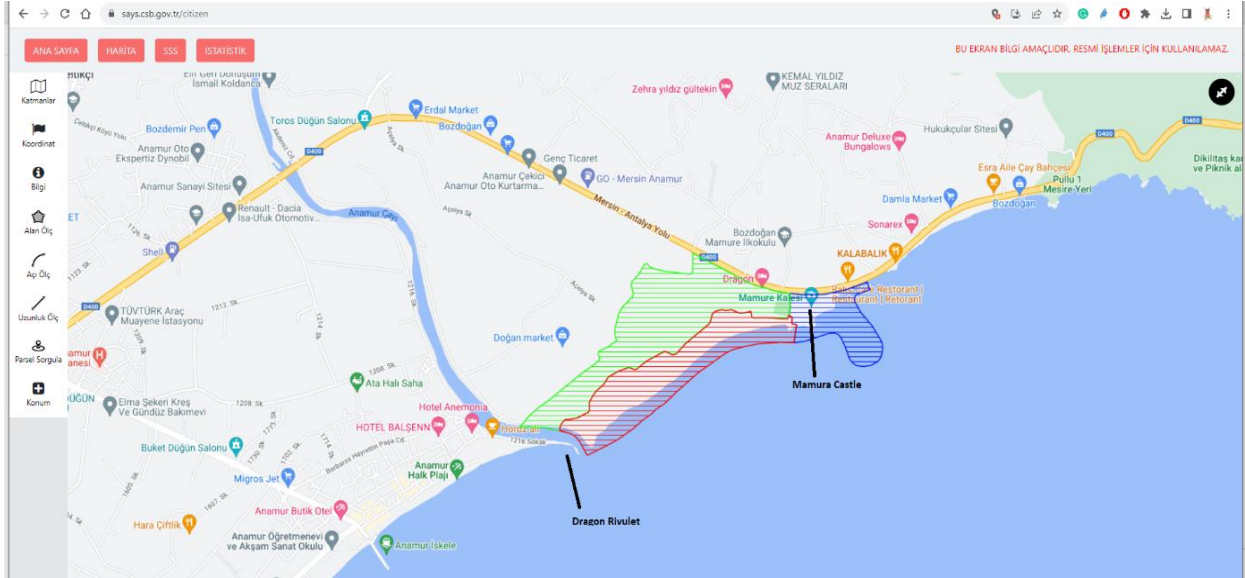


**Map 2)** Map displaying the allocated to the Anamur Municipality for Beach Development Phase. Area between 1 and 3 is completed so far - © MERÇED 8 August 2023





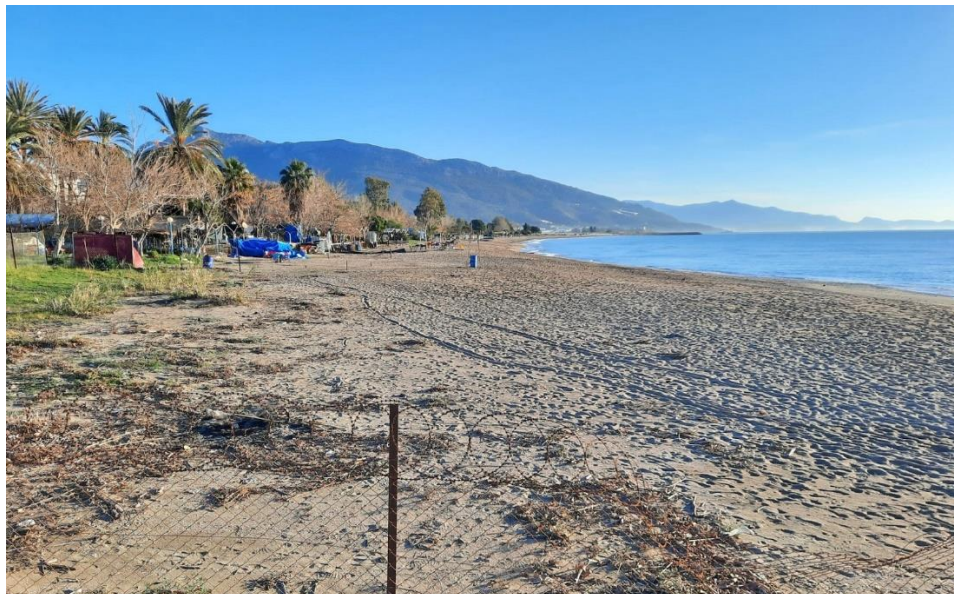
**Map 3)** Stone wall built alongside the Dragon River where African (Nile) Softshell Turtle (*Trionyx triunguis*) lives - © MERÇED February 2024



**Map 4)** The new Circular Changes the Conservation Status of the area between Dragon Rivulet, Mamure Castle and Pullu allowing for additional uses and limiting the protection of the beach.

The updated conservation status as defined in the web page <https://says.csbgov.tr/> is presented here. The Red area denotes “Precisely Sensitive Area to be Protected”, the Green area denotes “Sustainable Conservation and Controlled Use Area” and the Blue area denotes “Natural Archeological Site”)

**Figure 1 Vehicle entrance to the beach**



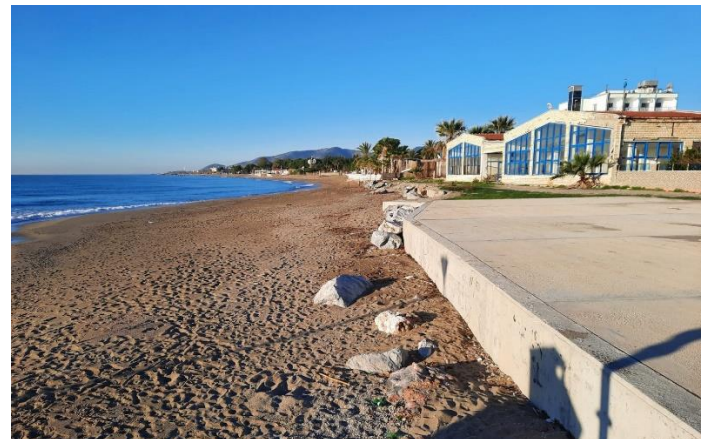
(Fig. 1) Car tire tracks on the beach

**Figure 2 (a-f). Expanding businesses on the nesting beach**



(Fig. 2a) Karaağaç Beach & Restaurant occupy beach. Ref6: Instagram account of Karaağaç Restaurant: <https://www.instagram.com/reel/C1KEjYfIXGW/> - January 2024

(Fig. 2b) Bungalows of the Karaağaç Beach & Restaurant. Ref7: Instagram account of Karaağaç Restaurant: <https://www.instagram.com/reel/C1OUqduIr8B/> - January 2024

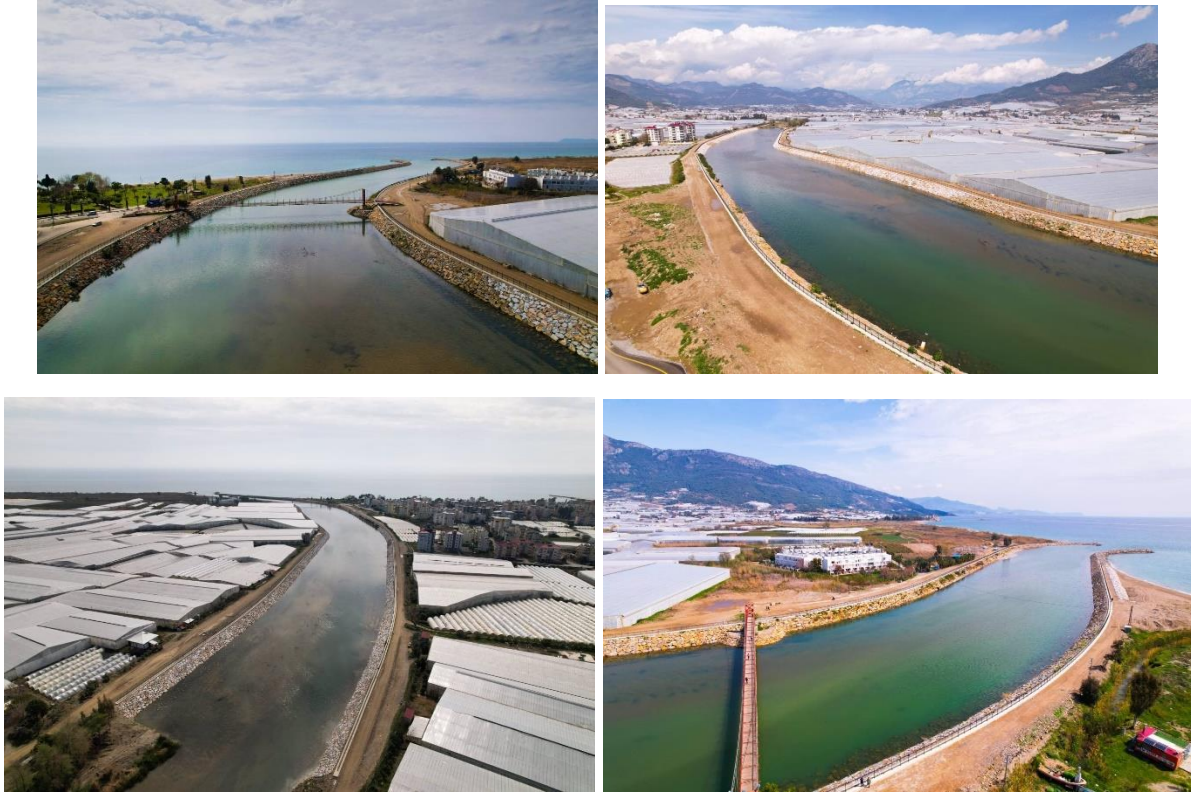






(Fig. 2c-2f) Businesses in the İskele Region – © MERÇED 6 February 2024

**Figure 3 (a-d). Stone wall built alongside the Dragon Rivulet**



(Fig. 3a-3d) Stone wall built alongside the Dragon Rivulet – Ref8: Website of the State Hydraulic Works (DSI) institution <https://www.dsi.gov.tr/Galeri/ResimgaleriDetay/4488> - © State Hydraulic Works (DSI) institution - 2023

## **ANNEX 2: REFERENCES**

### **Anamur: REPORTS & COMPLAINT SUBMITTED TO THE BERN CONVENTION**

*Available online at [www.medasset.org](http://www.medasset.org) or [www.coe.int](http://www.coe.int)*

T-PVS/Files(2022)32 - Government Report

T-PVS/Files(2022)33 - Complainant Report

T-PVS/Files(2023)56 - Government Report

T-PVS/Files(2023)42 - Complainant Report