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**Habitat destruction in Mersin Anamur Beach
(Türkiye)**

- REPORT BY THE COMPLAINANT -

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

UPDATE REPORT BY THE NGO

Marine Turtle Conservation in the Mediterranean

LOGGERHEAD SEA TURTLE (*CARETTA CARETTA*), GREEN TURTLE (*CHELONIA MYDAS*) & AFRICAN SOFT SHELL TURTLE (*TRIONYX TRIUNGUIS*) CONSERVATION MONITORING IN ANAMUR, MERSIN, TÜRKİYE

4 November 2024

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

for the 44th Standing Comm 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 44th Standing Committee Meeting of the Bern Convention (2-6 December 2024) on the conservation status of loggerhead (*Caretta caretta*) & green (*Chelonia mydas*) sea turtle nesting beaches and habitats of the African soft shell turtle (*Trionyx triunguis*) in Anamur, Türkiye.

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1. SUMMARY

This report covers the updates since the last report submitted for Autumn Bureau Meeting ([T-PVS/Files\(2024\)6](https://www.t-pvs.org/files/2024/06)).

As a result of the elections held on March 31, 2024, the political party and the Mayor governing the Anamur municipality changed. We hope that the new administration will not make the mistakes made by the former mayor. MERÇED will continue to monitor the new Mayor's and his team's actions, give advice if requested by the local authorities and report to the Standing Committee of the Bern Convention.

MEDASSET organized an On Site Appraisal (OSA) by a sea turtle expert in Anamur SPA in 29-30 June and 1 July 2024. The MEDASSET on site survey was funded through a grant from Aktionsgemeinschaft Artenschutz (AGA), www.aga-artenschutz.de. It was prior to the Bern Committee organized OSA (BCOSA). MEDASSET's report on the conservation status of the Anamur nesting beach is attached in Annex 1 and photos of this report are provided in Annex 2. This report highlights the fact that most issues included in the previous NGO reports have not been corrected, including light pollution, illegal vehicle entry to the beach, expanding businesses, stone walls alongside the *Trionyx triunguis* habitats (Dragon river and Sultan Stream) etc.

MEDASSET's OSA was followed by the Bern Convention expert's OSA (BCOSA) which took place 2- 4 July 2024. MERÇED as well as representatives from the local authorities and the central government participated in the BCOSA. MERÇED's observations during and after the BCOSA are presented in Annex 3 and the related pictures in Annex 4. During the BCOSA, a *Trionyx triunguis* was observed swimming in the Dragon river and nests of *Caretta caretta* and *Chelonia mydas* were also identified. During the BCOSA all parties discussed possible solutions to the issues. There was no communication and collaboration between the authorities and local NGOs until this BCOSA event, which enabled all parties to directly share their thoughts and perspectives with each other. The parties began evaluating problems and possible solutions to better protect and monitor the nesting beach. This is a promising outcome, which we hope will continue and that it was not just a show during the BCOSA.

This concern is driven by the fact that the corrective actions taken by the authorities on the beach prior to the BCOSA (for example, taking back the beach furniture, warning businesses to comply with the rules defined in the circular, etc.) have returned to the former state after the BCOSA team left Anamur. This situation discourages our hopes that corrective actions will be permanent.

In our detailed reports in Annex 1, 2, 3 and 4, we report on some positive progresses, such as the cancellation of the drilling permits on the nesting beach, which was part of the planned geothermal power plant. However, we also report on new negative developments and observations:

- 1) Plowing the beach with construction equipment for "cleaning and organizing" purposes in April,
- 2) Caravan camping work on the beach near Dragon River,
- 3) Concrete building construction and burial of a septic tank in the coast of the Anemurion Ancient city, which is a nesting beach and a 1st Degree Archaeological Site.
- 4) Negative effects of the stone walls and illegal huts in the Sultan Stream on the habitat of African soft shell turtle. (Ref: Annex 5 -[R1], Ref2, Ref3]
- 5) Reclamation works and pollution in streams and rivers

MERÇED and MEDASSET call upon the authorities to:

1. Ensure that local authorities and local businesses comply with the Turkish National law (Circular # B.18.0.DMP.0.01.03 - Ref: Annex 5-[R11]) and the Bern Convention's Recommendation No. 66 (1998),
2. 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). Businesses should be disciplined so that they stop to commit violations,
3. Allocate more staff and work with experts from a university, to ensure efficient and significant prevention, monitoring and data collection is performed,
4. Immediately establish the sea turtle commission, as decided during the BCOSA, and operate it effectively. Reported violations to the commission should be resolved effectively and in a timely manner,
5. Ensure that the positive cooperation and communication established with local NGOs during the BCOSA process continues,
6. Update the Ministry's National Biodiversity Inventory records to collect and include Green turtle's (*Chelonia mydas*) and African soft shell turtle's (*Trionyx triunguis*) data,
7. Rehabilitate the stone walls alongside of the Dragon River, Sultan Creek and Sarısu Creek that cause irreversible damage to the living environment and seriously affect the nesting activities and habitats of African soft shell turtles,

8. Fix the lighting of parks, tourism businesses, official premises, street lamps and apartment complex's lamps on the entire nesting beach. Especially the newly built Beach Arrangement Project (Devlet Bahçeli Park) and the Port (Iskele) region, should be evaluated in terms of the color, intensity, frequency and direction of the lighting, and necessary changes should be made, (Ref: Annex 4 - Fig. 13)
9. Stop illegally taking sand from the beach. Punish people/institutions that take illegal sand from the beach in a way that will provide deterrence,
10. Install permanent barriers to prevent illegal vehicle access to the beach in the Dragon and the Cerenler region,
11. The caravan area in the Dragon area and the iron profiles to establish the jet ski renting facility should be removed,
12. Remove the reinforced concrete building and the toilet area within the 1st degree archeological protected area and the 1st degree nesting protection zone in Anemurium Ancient City (Ören). Area should be rehabilitate to its natural state,
13. Ensure that the data collection process on sea turtle nests follows international protocols, (For example, GPS data of the nests should be recorded.)
14. Ensure that the restaurant that builds bungalow houses, plants grass, creates a walnut garden by pouring soil on the sand on Karaagaç beach, comply with the rules defined with the Circular, (Ref: Annex 5 - [R14]),
15. Fix the showers in Beach Arrangement Project (Devlet Bahçeli Park) to prevent water flows to the beach,
16. Remove the concrete floor in front of the Teacher's Guest House that narrows beach and causes nests to be submerged, (Ref: Annex 4 - Fig. 1f)
17. Release more water from the Hydroelectric Power Plant in Dragon Stream. Sedimentation flow must be ensured,
18. Provide sea turtle awareness and protection training to all municipal and government office employees (including cleaning personnel, construction workers, gardeners, electricians, technicians, excavator operators, etc.) who work at the beach or whose work interacts with the beach,
19. Publish the number of nests marked by the Nature Conservation and National Parks authority on the Anamur nesting beach separately, according to the sections of the beach and all existing sea turtle species (Loggerhead sea turtle (*Caretta caretta*), green sea turtles (*Chelonia mydas*) and African soft shell turtles (*Trionyx triunguis*). This information is requested for the past 5 years and future years.
20. Dismiss the zoning plan change in the Aquapark region affecting the nesting beach that is approved by the Municipality of the Anamur and the Mersin Metropolitan Municipality.
21. The damage to the streams from existing and possible mines in the region is unknown. Additionally, agricultural pollutants in the environment need to be investigated. Mass fish deaths occur at various times in these streams, which are home to African soft shell turtle. Again, the municipality's stream improvement and cleaning efforts are likely to have negative effects on the aquatic life in the streams.
22. The soil brought to the Karaagaç Picnic Area should be removed (Ref: Annex 4 - Fig. 16)

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

1. Encourage authorities to implement the necessary actions listed above.

ANNEX 1: Remains the same as previous report – [Annex 1 of July 2024 Report]

ANNEX 2: Remains the same as previous report - [Annex 2 of July 2024 Report]

ANNEX 3: MERCED’S ADDITIONAL REPORT FOR ANAMUR NESTING BEACH

The updated statuses of the previously reported issues are presented at MEDASSET’s OSA (On-spot Appraisal) report in Annex 1 and Annex2. This annex is a complementary document by MERCED to Annex 1 and Annex 2 to present the information not included in MEDASSET’s OSA report. It includes information gathered after MEDASSET’s OSA, during the Bern Convention’s OSA (BCOSA) and information gathered after the BCOSA was completed. The list of the issues presented in this annex is given below:

- Bern Convention’s OSA (BCOSA)
- Concrete building construction and installation of a septic tank in the Anemurium Ancient city
- The stone walls alongside the habitats of the African soft shell turtle (*Trionyx triunguis*) and illegal huts on the Sultan Stream,
- Plowing of the beach with construction equipment for "cleaning and organizing" purposes
- Caravan camping work on the beach near Dragon river
- Geothermal Drilling License
- The dam built on the Dragon River does not release enough water
- Expanding businesses on the nesting beach
- Insufficient Monitoring and Protection Status
- Communications and collaboration
- Green sea turtle (*Chelonia mydas*) Observations
- Zoning plan change
- Reclamation works and pollution in streams, rivers and canals
- Light pollution and sound pollution
- Illegal vehicle entry to the beach
- New Soil pile in the “Karaagac Picnic Area” region.

Details of the above issues are detailed in following sections:

1. Bern Convention’s OSA-2-4 July 2024

The BCOSA was very well organized. MERCED appreciates all the participants’ (Bern Convention, MEDASSET, scientific experts, Municipality representatives, Ministry representatives and NGO representatives) efforts to make the BCOSA a productive and solution-oriented activity. The visited areas during the BCOSA were the location between Pier (Iskele) and Taşlık region, the Beach Development Project area (Devlet Bahçeli Park), Cerenler, Karaağaç, Sultan Stream, Anemurium (Ören) and the Mamure Castle. The habitats of loggerhead sea turtle (*Caretta caretta*), green sea turtles (*Chelonia mydas*) and African (Nile) soft-shelled turtles (*Trionyx triunguis*) were observed. Some sample portions of the beach were visited during night to observe light pollution. Photographs of the BCOSA are presented in Figure 1, Annex 4.

The highlights of the BCOSA are listed below:

- There was good communication and collaboration between all parties during OSA. Productive conversations occurred to better protect and monitor the beach.

- A *Trionyx triunguis* turtle was observed in the Dragon River. (Ref: Annex 4 - Figure 1a) We were informed that this species is not in the Ministry's National Biological Diversity Inventory, and therefore it is not monitored (no data collected) due to lack of personnel. It was stated that it is difficult to locate the *Trionyx triunguis* nests, since it requires special training. The Ministry's National Biological Diversity Inventory must be updated to collect and include data on the *Trionyx triunguis* turtle! Nile turtle individual was seen around Rolly Hotel beach [R18].
- Some green sea turtle (*Chelonia mydas*) nests were detected during the BCOSA as well as many *Caretta caretta* nests.
- Around eight nest exit traces were observed only in the sampled visited areas during the BCOSA. This indicates that nesting had started at the end of April. However, according to the Circular # B.18.0.DMP.0.01.03, the nesting season starts on May 15 in terms of protection and monitoring studies. There is a great need to amend the circular. (Alternatively, the authorities need to start the measurement earlier than the Circular states.)
- Businesses which have sun loungers and other beach furniture on the beach had them removed prior the BCOSA. However, they moved the furniture back to the original positions as soon as the BCOSA team left. (Ref: Annex 4 - Figure 2)
- A very high percentage of unmarked / uncaged nests were seen.
- It was observed that the concrete wall built in the Teacher's Guest House narrowed the beach very much, therefore most of the sea turtle nests were at risk of being submerged, and there was also a very intense water flow to the beach during the washing of the concrete stage. (Ref: Annex 4 - Figure 1f)
- Especially around the Teacher's Guest House, nests were seen very close to the shore line and they will most likely be submerged under seawater during the high tides. However, we were informed that the nest moving process could not be carried out very often because the nest moving process took a long time and the current staff could not even keep up with the existing nests' marking. The nests close to the shoreline that could be saved by relocating to a safe place were abandoned to their fate.
- During the night, it was observed that the lights in the Coastal Development Project's, Pier's and businesses at the beach were too frequent, bright and intense, and their use of colors was inappropriate. Also some street lamps and some apartment blocks' lightning were facing the sea. Their direction needs to be reversed. The lighting of the whole coast line needs to be reviewed. (Ref: Annex 2 - Figure 5)
- The condition of the stone walls and huts in the Sultan Stream area was observed. This area is one of the four places where *Trionyx triunguis* turtles nest. (Ref: Annex 5 - [R1]) The illegal hunts and barracks had been removed from Dragon River, a few years ago. It is observed that those illegal constructions are located at the Sultan Stream (Ref: Annex 4 - Figure 4d-4e)
- In Karaağaç region, a business owner was seen planting grass on the beach, pouring soil on a part of the beach, installing watering pipelines and fertilizers to establish a walnut garden, and they built bungalow houses. (Ref: Annex 4 - Figure 1e)
- In Dragon and Karaağaç regions, there are many spots where you can drive to the beach without any barriers. (Ref: Annex 2 - Figure 5)
- In Anemurium (Ören), it was observed that there was a healthier ecosystem in terms of sand and vegetation richness in places where there is less or almost no human intervention. However no cage or marking is observed although foot prints of sea turtles are observed. (Ref: Annex 4 - Figure 1h)
- A very dense nest presence was observed in the Mamure Castle area. Many nests were not caged. (Ref: Annex 4 - Figure 1i)

2. Concrete building construction and installation of a septic tank (toilet) in the Anemurium Ancient city which is a nesting beach and a 1st Degree Archaeological Site.

The Anemurium Ancient city is the west border of the Anamur nesting beach. This site is protected as a 1st degree archaeological site and it is also one of a few well protected areas in the nesting beach, since this area is closed to settlement and away from human influence. Historical restoration works were being carried out for long time in this archaeological site.

We were informed that the construction works are being carried out in the name of “landscaping and social facilities” on the beach of Anemurium Ancient City. Photographs are provided in Annex4-Figure 3 and videos are available at the Facebook account of “Anamur Environment Platform” (Ref : Annex 5 - [R13])

The company that won the construction tender, as can be seen from the referenced video (Ref : Annex 5 - [R13]) shot about a month ago, excavated using heavy machines in an area approximately 25-30 meters away from the beach, where there are archaeological ruins, as well. They built a raft foundation which is contrary to the decision of the Adana Cultural and Natural Heritage Preservation Board. They started a reinforced concrete construction and dug a 3-4 m deep septic tank to be built on the western side of the building. Now the septic tank is covered with plywood to hide. (Ref : Annex 4 - Figure 3d)

Following the reactions and objections to the concrete construction, the illegal building's upper flat is removed, but the cement foundation and the septic tank were left behind. It is highly likely that the construction will continue in accordance with the board's decision. The coastline of the Anemurium ancient settlement had also been declared a natural protected area in accordance with the decision of the Presidency of the Republic of Turkey. In other words, archaeological and natural protected areas overlap. This coast is also protected by the Circular # B.18.0.DMP.0.01.03, about the protection of the sea turtles. The coast line just beyond the construction site goes all the way to the Sultan Stream. The area hosts sand lilies and other dune plants and sand dunes on the beach. Since this area has been well protected for hundreds of years, it has remained preserved until today. Opening this special area to construction activities under the name of serving and promoting tourism is against the rules of domestic law and the international regulations (Bern and Lahey Convention).

Public entrance to the ancient city is forbidden. Recent photographs presented at Annex 4 - Figure 3 do not show any cage marking. Most probably even the Nature Conservation and National Parks officials may not be able to enter the beach and mark, count nests.

3. The stone walls alongside the habitats of the African soft shell turtle (*Trionyx triunguis*) and illegal huts on the Sultan Stream,

According to academic publications (Ref: Annex 5 - [R1], [R2], [R3]), African soft shell turtles (*Trionyx triunguis*) were reported in four areas in Anamur between 2006 - 2007. These places are: Dragon Rivulet, Sultan Stream, Sarisu Stream and the Durağan wetland region between Dragon River and the Mamure Castle. Three of these four areas were recently covered with stone walls after this data collection period. The stone walls are not aslope enough, the stones pieces are too big and there are gaps in between stones. This situation causes no turtle species to be able to climb up for nesting. Those walls have destroyed their nesting habitats. After the data collection activities by academics, (in 2006, 2007) no significant academic research was conducted to follow up the latest situation. In addition, government officials stated during the OSA that no data was collected on the *Trionyx triunguis* sea turtles in Anamur, because this species was not included in the National Biodiversity Inventory records. In addition, the authorities admitted that there is no available human resource to collect data for *Trionyx triunguis*.

Related photographs are presented at Annex 4-Figure 4.

A *Trionyx triunguis* is accidentally caught by an excavation machine during water channel cleaning activities in Akdeniz Neighbourhood. This neighbourhood is not very close to the sea and it had never been recorded that *Trionyx triunguis* lives in that region.

Related photographs are presented at Annex 4-Figure 17 and video link is available in Annex 5 - [R18].

We urge the authorities

- to update the government's National Biodiversity Inventory records based on the academic publications, (Ref: Annex 5 – [R1])
- asses an urgent appraisal to collect latest status for this year,
- include African soft shelled turtles in the regular data collection process,
- increase man-power and provide training to collect data for African soft shelled turtles,
- Assess the stone walls built alongside the Dragon River, Sultan Stream, Sarisu Creek and make appropriate changes on the construction to let the sea turtles climb and make nest, (If necessary, get consultancy regarding the conditions that the wall must meet to let the turtles climb up)
- Remove the barracks built on the Sultan Stream.

4. Plowing the beach with construction equipment for "cleaning and organizing" purposes in April 2024

The Municipality's construction machines that can dig deep plowed the sand on the Anamur nesting beach as if it was a farm field in April 2024. The Municipality undertook this activity under the name of "beach landscaping, cleaning and preparation for the summer". Authorities claim that there is no problem because it was not done during the nesting season. However, this should not be done at any time of the year, as this activity harms the ecosystem consisting of every living thing from microorganisms to dune plants and vegetations that keep the beach healthy.

During the BCOSA, eight nest exit footprints were observed on 3rd of July. This means that nesting started at the end of the April. (Note that according to the Circular # B.18.0.DMP.0.01.03, nesting season starts on 15th of May, which is not valid for all regions and must be amended.)

Related photographs are presented at Annex 4-Figure 5.

5. Caravan camping work on the beach near Dragon river

During the nesting season, in the area close to the junction point of the Dragon River and the sea, a construction has started on the 25.06.2024. Initially construction machines entered the nesting beach. They altered the dune surface and made it flat. Then they cut the reeds and poured pebbles on the sand. A few days later caravans were seen parked in the area. It is not known whether this portion of the beach has been converted into a caravan park area permanently or whether it is a temporary situation.

Related photographs are presented at Annex 4-Figure 6.

During the BCOSA, these caravans were not there. MERCED will monitor if the caravans will come back again.

6. Geothermal Drilling License

Initial plan of the Geothermal Power Plant had covered three drilling points. One at the nesting beach and two at the mountains further from the beach. During the BCOSA, the authorities stated that the plan is updated to remove the point at the nesting beach. This is a positive progress. MERCED will continue monitoring the progress on this issue.

7. The dam built on the Dragon River does not release enough water.

There is a Hydroelectric Power plant on the Dragon River. Since this dam does not release enough water and the sediment does not flow into the sea, the gravel formation on the beach has increased. This situation causes the beach ecosystem to deteriorate and nesting is hindered for sea turtles.

8. Expanding businesses on the nesting beach:

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

Before the BCOSA, most of the businesses moved their beach furniture away from the shoreline and they decreased the number of sun lodgers to occupy less space at the beach. However, after the BCOSA was completed, everything went to the previous state. Photographs of this situation are given at Annex 4 - Figure 2.

Authorities walk the beach every day to mark nests but they do not impose any fine or warn the violators to establish a permanent solution to this problem.

“Karaağaç Beach & Restaurant” is one of these businesses. They grew grass on the beach, and they installed many bungalow houses. They placed sun loungers, umbrellas, tables, etc. on the beach within 20-30 meters away from the shoreline. The owner of the business claims that this portion of the beach is his own land and he started a garden in the beach. They poured soil over the sand and used an irrigation system and fertilizers and planted hundreds of trees to turn the beach into a walnut tree plantation. Also they use excavation machines very often to maintain the garden by mixing soil and sand on the beach, to dig holes at the beach to plant trees in the nesting season.

Since all the authorities are just “watching” all the increasing violations of the “Karaağaç Beach & Restaurant” and all other businesses, the business owners are becoming increasingly emboldened to commit even greater violations every year. This year, “Karaağaç Beach & Restaurant” owner built a concrete floor in the 1st protection zone. It is likely that a concrete building will be built on it in near future.

The authorities should investigate the legality of the work that has been done at the “Karaağaç Beach & Restaurant” and all other businesses operating on the nesting beach. And they should issue appropriate penalties to the business that do not comply with the Circular # B.18.0.DMP.0.01.03.

Photographs of the walnut plantation in the 1st Protection Zone of the “Karaağaç Beach & Restaurant” are provided in Annex 4 - Figure 8 and Figure 9.

The Karaağaç Beach & Restaurant Instagram account provides additional videos and photographs of the facility (Ref: Annex 5 - [R14] -<https://www.instagram.com/karaagacbeach/>)

This business is not the only one that occupies the nesting beach. There are many businesses in the Beach Development Project area and in the Pier (Iskele) region. The photographs of all these businesses are given in previous reports. The beach furniture management of all these facilities does not comply with any rules. The businesses keep beach furniture at the beach during the day and night. All of these businesses cause large amounts of noise and light pollution until late hours.

All these activities negatively affect the sea turtles' chances of nesting.

9. Insufficient Monitoring and Protection Status

There is no regular and scientific monitoring study on the Anamur nesting beach. The Nature Conservancy and National Parks have assigned only 1-2 people 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. Monitoring, conservation, and raising awareness work should be carried out with additional professionals, academic support and volunteers.

During the BCOSA, this issue was raised. It has been proposed to local authorities to provide accommodation areas for volunteers and meet the logistical needs of this future volunteer team, which will monitor and protect the beach. Then national and international volunteers and funds will be sought. Officials promised to consider this offer. It was recommended that the volunteers receive training by the National Sea Turtle Scientific Commission or a qualified NGO such as DEKAMER, EKAD, and WWF-Türkiye to train volunteers before starting their duties in the Anamur.

This issue was brought up during BCOSA. It was recommended to local governments to meet the logistical needs of this volunteer team that will inspect and protect the beach and to create accommodation areas for the volunteers. National and international volunteers and funds will then be sought. Officials promised to consider this offer.

10. Communications and collaboration

Before the BCOSA, there was not sufficient communication and collaboration between the authorities and the NGOs. A positive communication was established during the BCOSA. MERCED hopes that this positive situation will be permanent and will help to effectively protect the area.

During BCOSA, the authorities declared that a sea turtle committee would be established with the participation of local authorities and relevant NGOs. It was decided that the committee would meet periodically and assess local issues in order to be aware of problems / violations and to provide faster resolution. It was also aimed that, the committee would visit the beach if a violation was reported by NGOs to observe the issue in the field. However, the committee is not established so far. This situation has damaged our confidence in the positive communication environment created during BOSA.

11. Green sea turtle (*Chelonia mydas*) Observations

During the BCOSA, Green sea turtle (*Chelonia mydas*) nests were observed in the Dragon beach. After the OSA, people living at the Oren region recorded Green sea turtle hatchlings videos on 27.07.2024. (Full video reference is in Annex 5 - [R16]) Screenshot of the video and map of the location are available at Annex 4 - Figure 10.

12. Zoning plan change

There is no progress for this reporting period on this issue. No information was provided to MERCED 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. MERCED members and many citizens objected to this plan. The details of the new zoning plan had been shared in previous year's reports.(T-PVS/Files(2022)33)

13. Reclamation works and pollution in streams, rivers and canals

The streams, rivers and canals in the region are home to the African (Nile) soft-shelled turtles. There are attempts to open many stone, coal, marble and dolomite quarries in most of the locations of the Anamur. It is later understood that experts and public institutions do not show environmental sensitivity during the preparation of EIA reports. If these attempts are successful and mines are opened, there is a high probability that these facilities will have a negative impact on the rivers and streams where African (Nile) soft-shell turtles live.

In addition, as a result of agricultural activities aimed at the production of tropical fruits such as bananas, strawberries, etc. and other products in the region, it is highly likely that pesticides, pesticides and chemical fertilizers will have negative effects on these streams and rivers. Mass fish deaths occurred in a stream that was blocked in August. The death of mullet (*Mugilidae*) fish, which has high tolerance, that can survive even in adverse conditions, shows how dire the situation is.

The municipality carried out major cleaning and reclamation works in many streams with digger machines in 2024. During the cleaning, aquatic plants that allow African (Nile) soft-shelled turtles and their food fish and other aquatic organisms to shelter and lay eggs were also destroyed. On the other hand, the activities mentioned above are likely to have negative effects on the habitats of African soft shell turtle.

The damage to the streams from existing and possible mines quarries in the region is unknown. Additionally, agricultural pollutants in the environment need to be investigated. Mass fish deaths occur at various times in these streams, which are home to Nile turtles. Again, the municipality's stream improvement and cleaning efforts are likely to have negative effects on the aquatic life in the streams. (References [R16-R17] includes videos)

Related photographs are presented at Annex 4-Figure 14-15.

14. Light pollution and sound pollution

Serious light and sound pollution exist and the amount of the pollution is increasing every year. The extent of light and sound pollution, caused by street lighting, restaurants and entertainment venues operating on the beach, within the scope of the beach arrangement project, is alarming. The lights of the facilities are kept on until very late at night. The lighting of the parks and walking paths remain on all night. Lights are intense, wrong color and their positions are inappropriate. They directly affect the nesting beach. Strong and intense lighting that was recently added to the harbor that started to operate this summer. Only one light on the beach was eliminated since our last year's report. The land that is slated for the Beach Arrangement Project - Phase3 is being used as a parking lot at night and the impact of vehicle lights on the beach were identified.

There are 4 main facilities or business in the region that cause extremely high sound pollution (Anamur Municipality 82 facilities, Yalçınkayalar wedding hall, Atalay Wedding Hall, Ünlüselek Hotel) and many cafes and bars.

Images of light and sound pollution are presented in Annex 2-Figure 5, and Annex 4-Figure 7c, d, e, Figure 13

15. Illegal Vehicle Entry to the Beach

Although it is stated in every previous report, still there is no progress to install permanent barriers to prevent vehicle access to the beach. This situation not only causes cars and even towed boats to enter the beach, but also causes crowded groups to come to the beach late at night, playing loud music from the car, causing glare with headlights of the cars, and night visitors leaving lots of garbage behind, including broken glass bottle pieces. In addition, entering the beach by vehicle makes it easier to attempt to steal sand from the beach.

Related photographs are presented at the Annex 4 - Figure 7j, Figure 11 and Figure 12.

16. Status of Karaagac Beach – New Soil Pile

It was observed that nature was rehabilitating remaining of the soil in the Karaagac Picnic Area region. (See Annex 2 – Figure 1). However a new pile of soil is observed in the same area. It is not spread to the beach yet. Whoever brought that soil might be planning to spread over the sand in the future. The authorities must take urgent action to remove that soil and penalize those who bring that soil to the beach.

Also it is observed that a new strawberry field (greenhouse) is being built at the north side of the picnic area (above the Sarısu Creek) During those activities, it is observed that reeds are cut alongside the Sarısu Creek and lots of plastic waste is spread around even inside the creek. That Creek connects with the sea within 40-50 meter. All these plastics will flow to the sea later on. This should negatively affect the creek and the marine life. Sarısu Creek is one of the 4 areas that are mentioned in the article (Ref: Annex 5 - [R1]) where African soft shell turtle (*Trionyx triunguis*) observed in the Anamur.

In addition, reeds that had previously reached a height of 2 meters were cut on the banks of the Sarısu Creek.

Related map and the photographs are presented at Annex 4-Figure 16.

ANNEX 4: MAPS & PHOTOGRAPHS

Figure 1a-i - Photos taken during the BCOSA 2-4 July2024



Fig. 1a) African soft shell turtle (*Trionyx triunguis*) welcomes the BCOSA team in the Dragon River.

Fig. 1b) Checking if the nest area is submerged or not, since the nest is close to the sea



Fig. 1c) The only official who is on duty monitoring the 12+ km beach is taking notes.

Fig. 1d) The BCOSA team is walking at the beach



e

Fig. 1e) The BCOSA team is evaluating the business that has constructed bungalow houses and established a walnut garden by pouring soil over sand at the Karaagac beach.



Fig. 1f) The area in front of the Teacher's Guest House. The concrete wall and the sun loungers in front of the building narrowed the beach. This poses the risk of some of the nests right in front of the sun loungers being submerged. Additionally, during the field inspection, it was observed that a large amount of water was flowing onto the beach due to the concrete floor being washed. Red marked areas depict the flowing water.



Fig. 1g) The area in front of the Military grounds. The concrete wall narrowed the beach. This poses the risk of some of the nests right in front of the wall being submerged. Red area marks the nest cage.



Fig. 1h) The BCOSA team at Anemurium region. Endemic sand plants are visible, whereas there is none left in front of the Beach Development Park. Also no cage is observed as an outcome of monitoring activity



Fig. 1i) Nests in the Maure Castle region. Almost 16 nests are visible at this picture. However, uncaged sea turtle nests are observed too.

Figure 2 a-c Photos taken after the BCOSA - July 2024



Fig. 2a) The businesses moved beach furniture closer to a distance of 15-20 meters from the shore after the BCOSA team left Anamur. (© MERÇED 8 July 2024) The sea turtle nest in front of the sun lounge is marked in red.

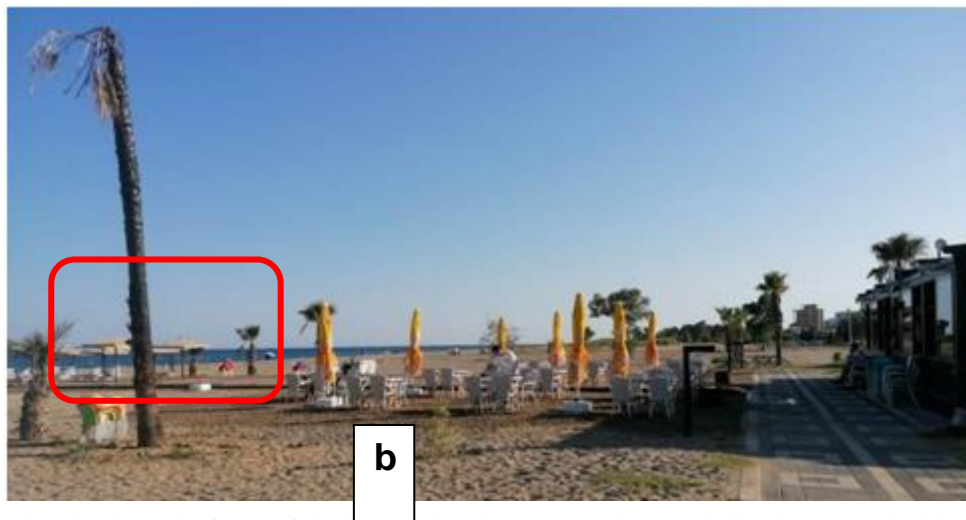


Fig. 2b) Another business in front of the beach development park. Beach furniture marked in red area were removed during the BCOSA. (© MERÇED 8 July 2024)



Fig. 2c) Another facility in front of the beach development park. Beach furniture moved close to the sea after the BCOSA team left Anamur. (© MERÇED 14 July 2024)

Figure 3 a-f. Concrete Construction at Anemurium Ancient City – June-July 2024



Fig 3a, b) Ancient City before construction starts - Red area in Fig 3b depicts construction area (underneath the two trees) There is a historical stonewall between the nesting beach and the construction area.



Fig 3c) Construction Information Sign: According to the sign, "Mersin Governorship awarded the "Anemurium Ancient City 1st Stage Landscaping Work" to a company called Tuba Construction to be completed between February 13, 2004 and March 17, 2025. "Entrance not allowed due to the restoration works."



Fig 3d) Ancient City illegal construction - Red area depicts the septic (toilet) area which was dug 2-3 meters deep. The blue line depicts a historical stone wall between the nesting beach and the construction area.

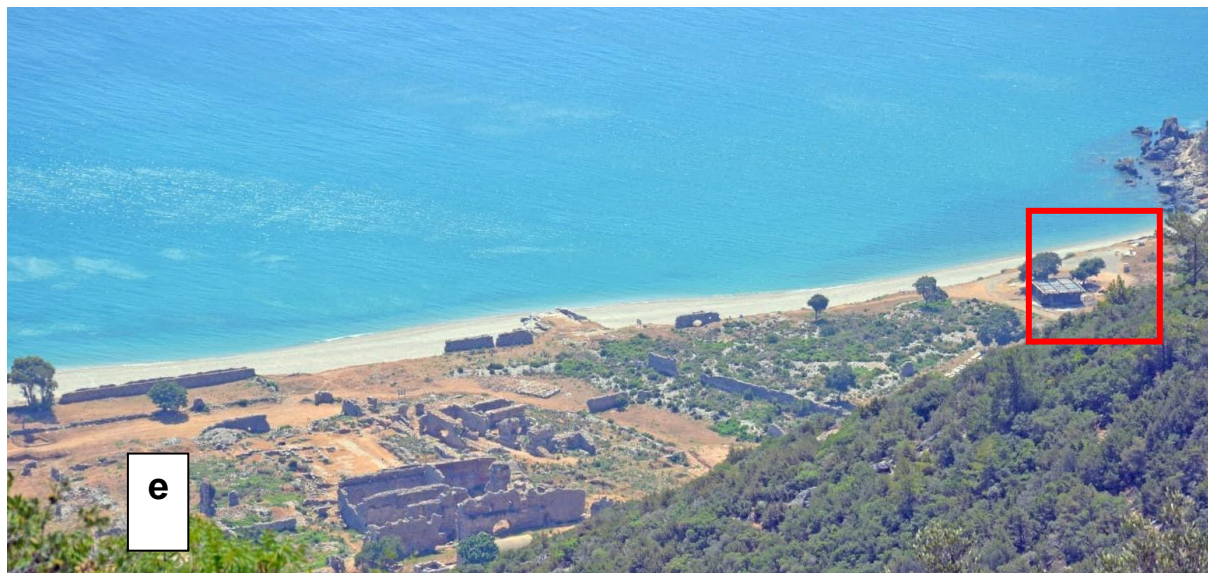


Fig 3e) The illegal construction at the east side of the ancient city. Entrance to the ancient city is forbidden after the construction started. There are no nest cages over nests observed in the beach. Most probably, the Nature Conservation and National Parks officials may not be able to enter the beach to mark or count nests.



Fig 3f) The upper flat of the building was demolished as a result of public complaints. But the basement and the toilet still exist. The building should be removed totally. The red area depicts the septic (toilet) area which is covered by plywood to hide.

Figure 4 a-f- Stone Wall Alongside the Trionyx Habitats

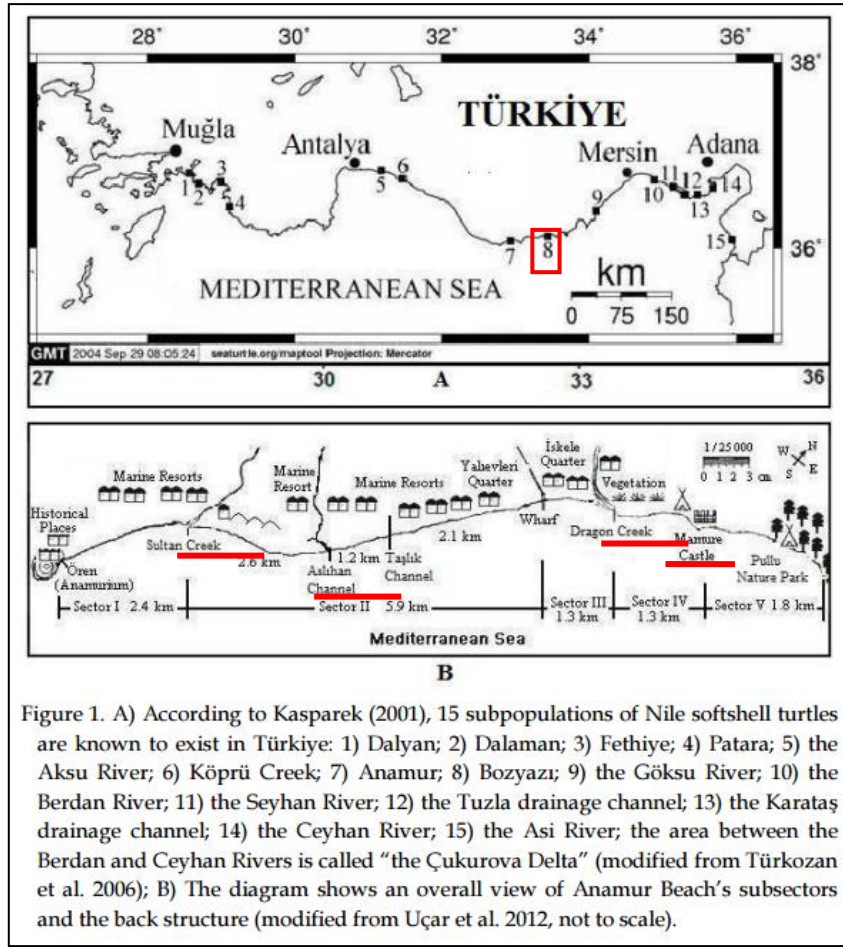


Fig. 4a) Figure 1 of the academic publication “(Ref: Annex 5 -[R1] - First data on African softshell turtle(*Trionyx triunguis*) nests on Anamur Beach in Mersin on the eastern Mediterranean coast of Türkiye, by Aşkın Hasan UÇAR and Serap ERGENE, 2022” (Red lines depict African softshell turtle habitats according to the aforementioned academic publication)

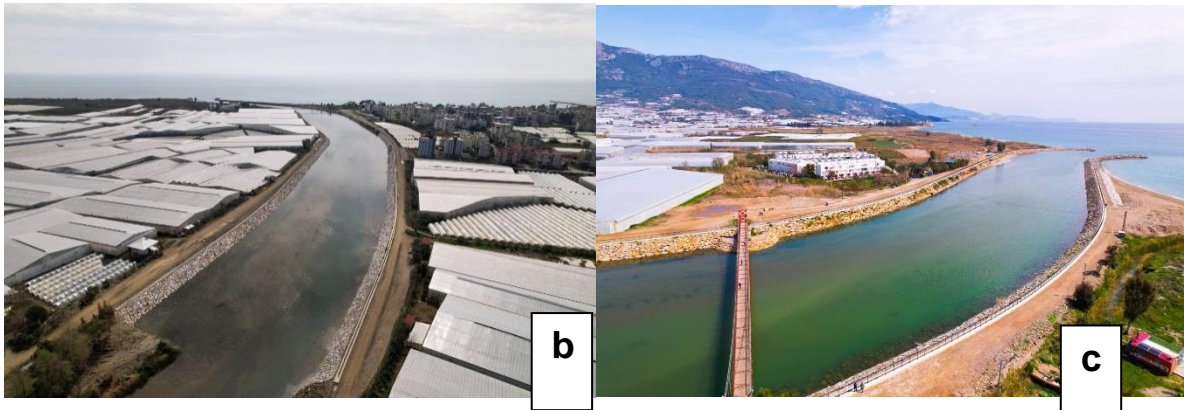


Fig. 4b-4c) The stone wall built alongside the Dragon Rivulet (Ref: Website of the State Hydraulic Works (DSI) institution <https://www.dsi.gov.tr/Galeri/ResimgaleriDetay/4488>- © State Hydraulic Works (DSI) institution – 2023)



Fig. 4d-4e) The stone wall and illegal huts built alongside the Sultan Stream © MERCED - 1 July 2024

Figure 5 a-e - Plowing of the nesting beach with construction equipment - 20.04.2024



Fig 5 a-e) The nesting beach is plowed by construction machines resulting in habitat destruction (© MERÇED 20 April 2024)

Figure 6 a-d - Caravan Camping Area Construction at the Dragon Beach- 25 - 30 June 2024

Fig.6a, 6b) In the Dragon beach region, during the nesting season the Municipality construction machines entered to the beach. They flattened the dune surface and they cut the reeds. 25.06.2024

Fig. 6c) They poured white pebbles on the surface. 27.06.2024

Fig. 6d) Caravans are observed in the same area after a few days. However during the BCOSA, there were no caravan. They were all removed from this area to prevent their photographs taken during the BCOSA.

Figure 7a-1 - General Anamur Beach Photos- June-July 2024

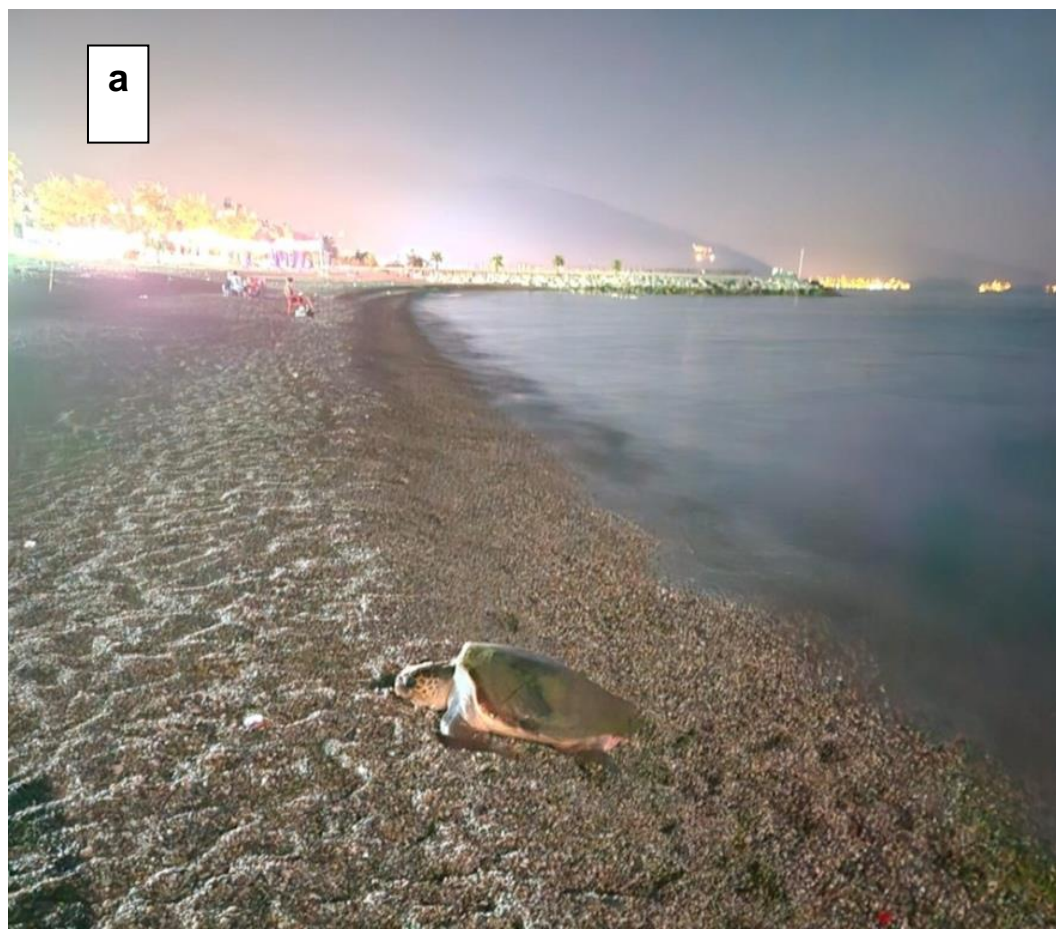


Fig. 7a) *Caretta caretta* came to the beach to lay eggs with bright lights at the background



Fig. 7b) Corn sellers' vehicle at the beach



Fig. 7c) White, green and red lamps are used in the Beach Development Park (Devlet Bahçeli Parkı)



Fig. 7d) Street lamps facing to the sea in Cerenler region. 7e) Lights of the MESKİ (Water and Sewerage Office of Mersin Metropolitan Municipality) Pump station building - June 2024

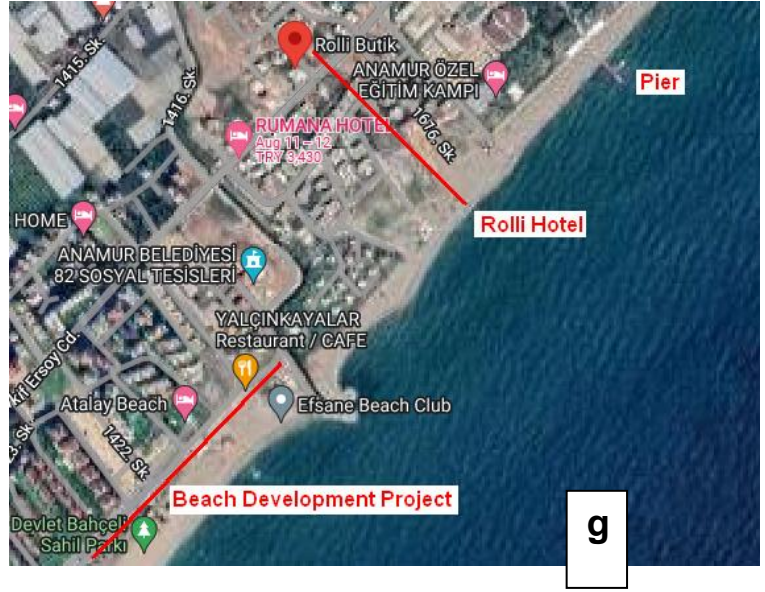


Fig. 7f) Screenshot of a video displaying dead hatchling found in front of Rolli Hotel which is almost 250 meter far from the shore line. The lights of the businesses facing the beach in front of Rolli Hotel need to be corrected. - June 2024 (Full video link available at Annex 5 – [R15])

Fig. 7g) Map of the Rolli Hotel, displaying distance to shore line.

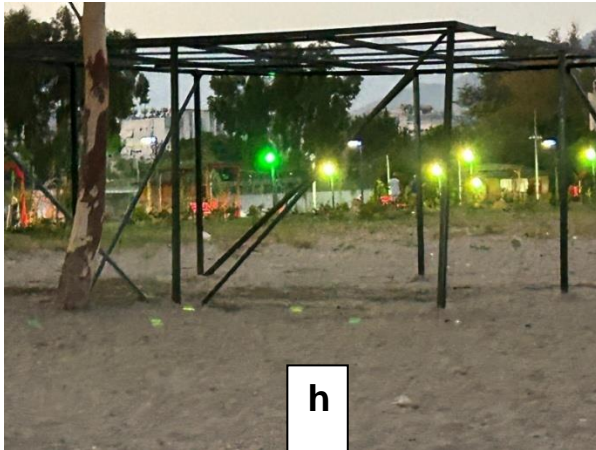


Fig. 7h- 7i) Iron profiles installed at the Anamur beach. It is learned that it will be a jet ski facility. And Nature Conservation and National Parks officials promised that the building will be removed. MERCED will monitor the status of the building.

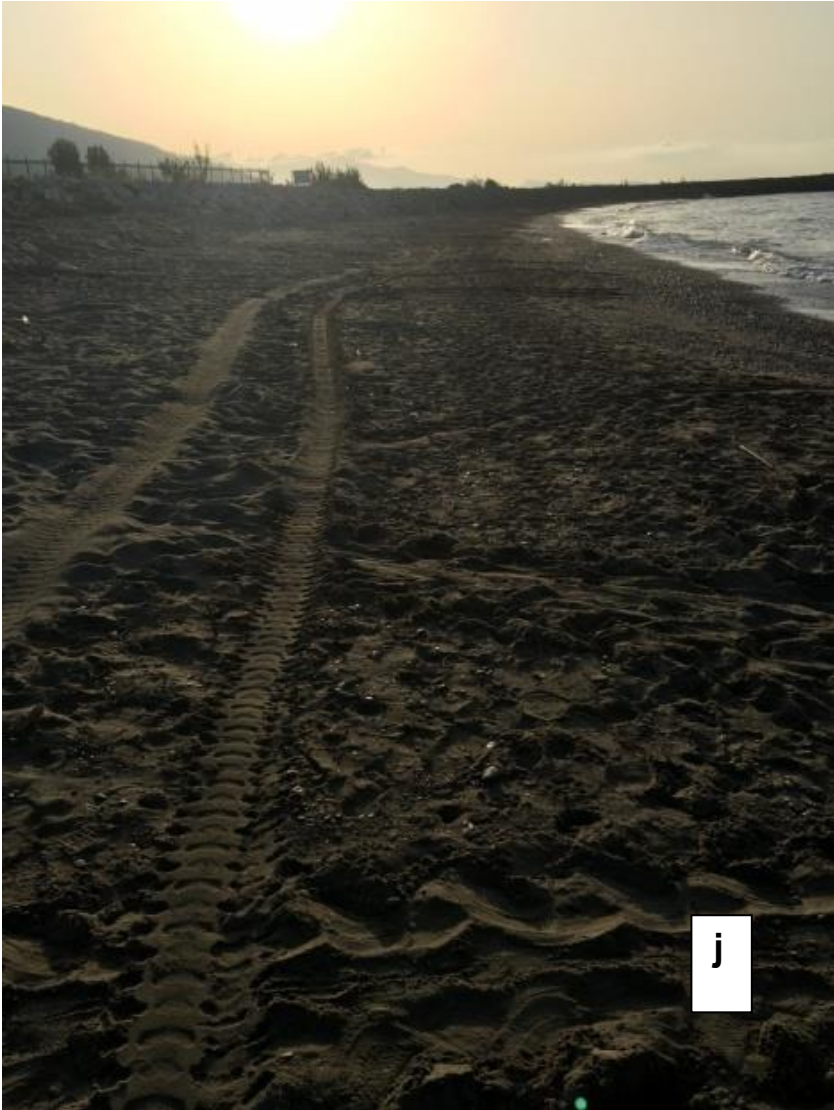


Fig. 7j) Vehicle access tracks – June 2024



Fig. 7k, 7l) Plastic pollution at the beach. They are getting close to become micro plastics. They are approaching microplastic. They are candidates to be washed into the sea and swallowed by sea turtles.

Figure 8 “Karaağaç Beach & Restaurant” - Garden Construction - July 2024

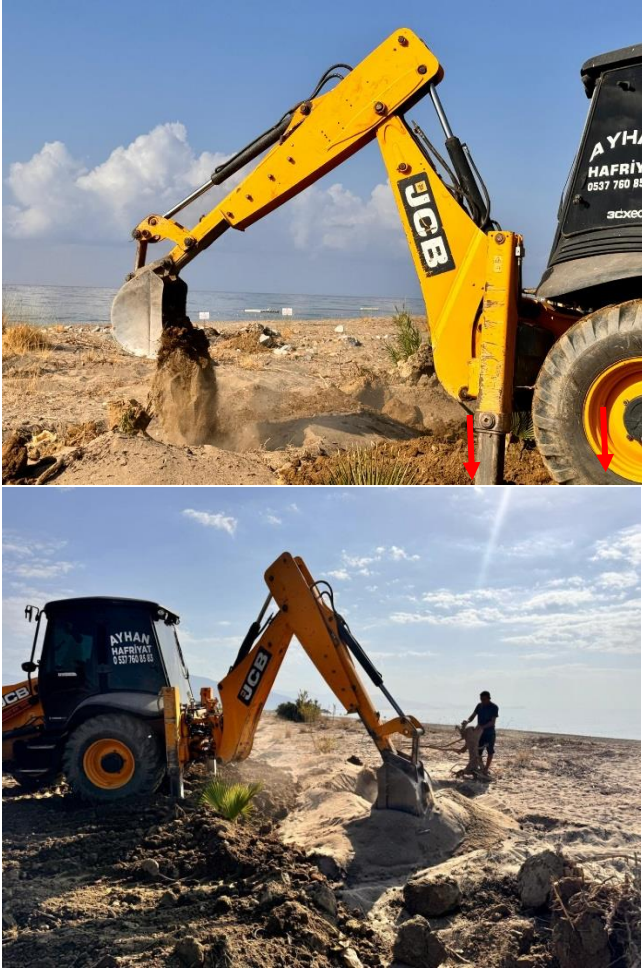


Fig. 8a) The restaurant and accommodation facility owner stated that they maintain their garden. Soil and trees were not at the beach a few years ago. Nest signs can be seen at the back - Karaagac Beach July 2024





Fig. 8b) This area is within the 1st protection zone of the nesting beach. This soil and trees did not exist a few years ago - Karaagac Beach July 2024

Figure 9 “Karaagac Beach & Restaurant”- Garden Construction and Concrete Floor - August 2024







Fig. 9) Excavation machines are regularly being operated during nesting season in the 1st protection zone of the beach. They mix soil and sand by the machines. They continue planting olive, walnut and fruit trees, and using fertilizers on the beach and continue agricultural activities, Plastic irrigation pipes resulting from antropojenic activities, Debris resulting from antropojenic activities, Habitat deformation of turtle nest beach as a result of interventions in the coastal zone with scoops in Karaagac. Also they built a concrete floor in the 1st protection zone - August 2024

Figure 10 Green sea turtle (*Chelonia mydas*) Hatchlings in Ören - 26 July 2024





c

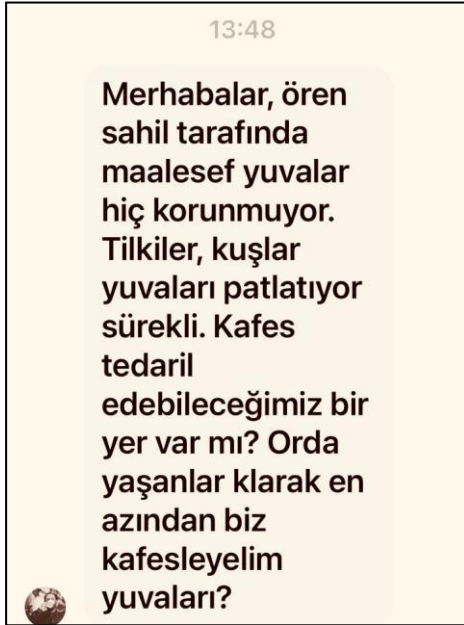


Fig. 10a) Green sea turtle (*Chelonia mydas*) Hatchlings in Ören region - Screenshot of videos shared at Annex 5 – [R16].

Fig. 10b) Map of the hatchling region (west of the Anamur nesting beach)

Fig. 10c) Comment added to the Facebook post of the Green sea turtle (*Chelonia mydas*) Hatchlings videos (Annex 5 – [R16]). Translation: “Hello, Unfortunately, nests are not protected on the coast of Ören. Foxes and birds are constantly destroying nests. Is there somewhere we can supply cages? At least we, as those living there, might protect nests by putting cages.

Figure 11 Illegal Car Entry to the Beach - August 2024



Fig. 11) A car parked near sand lilies (*Pancratium maritimum*), an endemic plant- August 2024

Figure 12 Car Tire Tracks Close to the Sea Turtle Nests - August 2024

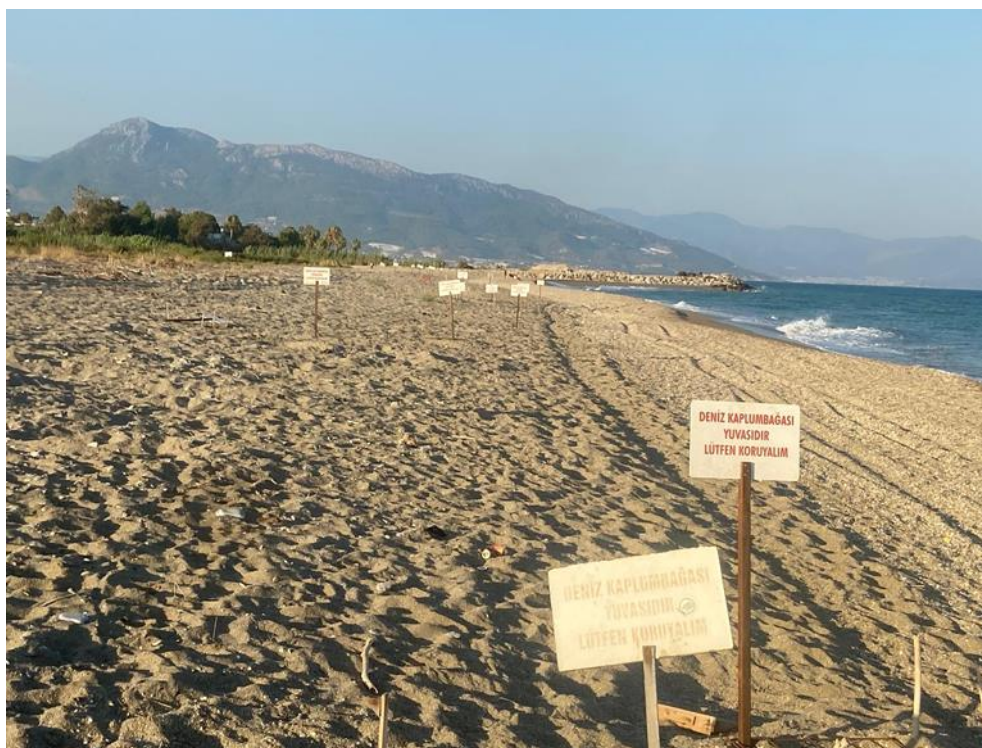


Fig. 12) Vehicle tire tracks seen on the beach despite the warning sign "There is a sea turtle nest"- August 2024

Figure 13 Light Pollution - September 2024



Fig. 13) Lighting poles at the bottom of the beach area where sea and turtle nests are located in Devlet Bahçeli Park. September 2024

Figure 14 Destruction of Aquatic Plants and Pollution in the Streams





Fig. 14a, b) Destruction of aquatic plants in the stream next to Anamur 82 facilities



Fig. 14 c) Pollution in the stream next to Anamur 82 facilities

Figure 15 Mass Fish Deaths in the Streams



Fig. 15 a, b) Mass fish deaths in various streams in Anamur. Videos are available at Ref [R17]

Figure 16 Soil Pile at the Karaagac Picnic Area – October 2024



Fig. 16a) Map of Karagac Beach November 2024 @Yandex Maps.

This map shows, new soil pile at the east of the beach (between Sarisu Creek and the sea). Also it displays the Karaagac Beach & Restaurant before they start invading the beach. No bungalows, no walnut garden, no concrete floor, no beach furniture.



Fig. 16b) New soil pile is put on the beach. Reeds of the Sarsu Creek are cut during strawberry field works – Karaagac Beach – November 2024



Fig. 16c) Soil pile on the beach. Since there is no barrier to entrance of the beach it is easy to bring soil or extract sand from the beach – Karaagac Beach – November 2024



Fig. 16c) Plastic pollution caused by the strawberry field established on the north side of Sarisu Creek. In addition, reeds that had previously reached a height of 2 meters were cut on the banks of the Sarisu Creek – Karaagac Beach – November 2024

Figure 17 Soil Pile at the Karaagac Picnic Area – October 2024



Fig. 16c) A Nile turtle (*Trionyx triunguis*) individual caught during channel cleaning activity in the Akdeniz Neighborhood – Akdeniz Mahallesi (Neighbourhood) – November 2024 – Screenshot of video given in Annex 5 - [R18] – Copyright “anamurun_sesi” instagram account.

ANNEX 5: REFERENCES

Anamur: REPORTS & COMPLAINT SUBMITTED TO THE BERN CONVENTION

Available online at www.medasset.org or 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

T-PVS/Files(2024)31 - Government Report
T-PVS/Files(2024)6 - Complainant Report

RELEVANT RECOMMENDATIONS OF THE STANDING COMMITTEE:

Rec. No. 7 (1987) on the protection of marine turtles and their habitat
Rec. No. 8 (1987) on the protection of marine turtles in Dalyan and other important areas in Turkey
Rec. No. 12 (1988) concerning the protection of important turtle nesting beaches in Turkey
Rec. No. 24 (1991) on the protection of some beaches in Turkey of particular importance to marine turtles
Rec. No. 66 (1998) on the conservation status of some nesting beaches for marine turtles in Turkey

Academic Publications Related with Sea Turtles in Anamur, TURKEY

[R1] Aşkın Hasan UÇAR and Serap ERGENE, (2022), First data on African (soft shell turtle (*Trionyx triunguis*) nests on Anamur Beach in Mersin on the eastern Mediterranean coast of Türkiye,; https://biozoojournals.ro/bihbiol/cont/v16n2/bb_e221305_Ucar.pdf

[R2] Max Kasparek (2000) - Status of the Nile Soft-shelled Turtle, *Trionyx triunguis*, in Turkey: An assessment in the Çukurova Delta with Recommendations for Conservation Management – January 2020 - Report for the 20th Meeting of the Standing Committee of the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) Affiliation: MEDASSET / Council of Europe
https://www.researchgate.net/publication/289968156_Status_of_the_Nile_Softshelled_Turtle_Trionyx_triunguis_in_Turkey_An_assessment_in_the_Cukurova_Delta_with_Recommendations_for_Conservation_Management/citations

[R3] Aşkın Hasan UÇAR (2008) Investigation of Biological Properties of Sea Turtles *Caretta caretta* and *Cheloniemydas* and Soft Shell NileTurtle *Trionyxtriunguis* Populations and Anamur Nesting Beach Properties. Ph.D. Thesis. Mersin University, Institute of Science and Technology, Department of Biology. Thesis Advisor Dr. Serap Ergene, Mersin, December 2008

Prof. Dr. İbrahim Baran and Dipl.-Biol. Max Kasparek, 1989, Marine Turtles Turkey. Status survey 1988 and recommendations for conservation and management.

[R4] Casale P., Boderick A.C., Camiñas J. A., Cardona L., Carreras C., Demetropoulos A., Fuller W. J., Godley B. J., Hochscheid., Kaska Y., Lazar B., Margaritoulis D., Panagopoulou A., Rees A. F., Tomás J. & Türkozan O. (2018) ‘Mediterranean sea turtles: current knowledge and priorities for conservation and research’

https://www.researchgate.net/publication/326775961_Mediterranean_sea_turtles_current_knowledge_and_priorities_for_conservation_and_research
Supplement : https://www.int-res.com/articles/suppl/n036p229_supp.pdf (Table S9, S15, S18, S20 defines

Caretta caretta numbers)

[R5] European Reptile & Amphibian Specialist Group. 1996. Trionyx triunguis (Mediterranean subpopulation). The IUCN Red List of Threatened Species 1996: e.T22200A9364253. <http://dx.doi.org/10.2305/IUCN.UK.1996.RLTS.T22200A9364253.en>

[R6] Aşkın Hasan UÇAR, Serap ERGENE, Yakup KASKA, Cemil AYMAK, (December 2019) Sex Ratio Estimation of the Most Eastern Main Loggerhead Sea Turtle Nesting Site: Anamur Beach, Mersin, Turkey https://www.researchgate.net/publication/236646756_Sex_Ratio_Estimation_of_the_Most_Eastern_Main_Loggerhead_Sea_Turtle_Nesting_Site_Anamur_Beach_Mersin_Turkey

[R7] IUCN MTSG report Sea turtles in the Mediterranean, 2010: distribution, threats and conservation priorities <https://portals.iucn.org/library/efiles/documents/2010-012.pdf> (Turkey section is given in pages 257-293. Authors for “Turkey” section : Oğuz Türkozan and Yakup KASKA)

[R8] Peter Paul van Dijk, Tomas Diagne, Patrick Joseph Baker, Ertan Taskavak, December 2017, Trionyx triunguis. IUCN Red List Assessment https://www.researchgate.net/publication/323990667_Trionyx_triunguis_IUCN_Red_List_Assessment

[R9] Hochscheid et al. (2018). Sea Turtles in the Mediterranean Region: MTSG Annual Regional Report https://mtsg.files.wordpress.com/2018/11/mtsg-annual-regional-report-2018_mediterranean.pdf

Other References Used in the Document

[R10] Circular # B.18.0.DMP.0.01.03 / 831.02 dated October 2009 - About the protection of the sea turtles, Released by the General Directorate of Nature Conservation and National Parks of the Ministry of Environment and Forestry. [https://kms.kaysis.gov.tr/\(X\(1\)S\(pvtdfjxi5h25d2jwmaoqoy4\)\)/Home/Goster/56800?AspxAutoDetectCookieSupport=1](https://kms.kaysis.gov.tr/(X(1)S(pvtdfjxi5h25d2jwmaoqoy4))/Home/Goster/56800?AspxAutoDetectCookieSupport=1)

[R11] Posts at the facebook account of “Anamur Environment Platform” regarding with the negative issues affecting the Caretta caretta nesting or the hatchlings
<https://www.facebook.com/share/r/wDW3YrMwpjfqbjqZ/?mibextid=UalRPS>
<https://www.facebook.com/share/r/sZX6z43RgCjUxMdH/?mibextid=WC7FNe>
<https://www.facebook.com/share/v/Yv21pXY9yyvvVnpW/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/hYsArz8aMMFhEpGc/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/j7CtM6P152qDriGP/?mibextid=WC7FNe>

[R12] Posts at the Facebook account of “Anamur Environment Platform” regarding with the concrete construction at the Anemurium Ancient City.
<https://www.facebook.com/share/p/wyu79cVm5XUELDzy/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/AVd1riQqbs1kAt77/?mibextid=WC7FNe>
<https://www.facebook.com/share/wMmgNR3wxPNUKPzH/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/tD47gNpav4z4WWxj/?mibextid=WC7FNe>
<https://www.facebook.com/share/RTiEBJnrZuPqCuZr/?mibextid=WC7FNe>
<https://www.facebook.com/share/rAJNgfLbEdd7pHFp/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/CawSAiVmrU6AfLEj/?mibextid=WC7FNe>

[R13] Karaagac Restaurant company’s Instagram account : <https://www.instagram.com/karaagacbeach/>

[R14] Post at the Facebook account of “Anamur Environment Platform” regarding with the dead hatchling found in front of Rolli Hotel. This hotel is almost 250 meter far from the shore line:

<https://www.facebook.com/share/r/CmdzjAKSjQxsxDSS/?mibextid=WC7FNe>

[R15] Post at the Facebook account of “Anamur Environment Platform” regarding with the green sea turtle (*Chelonia mydas*) hatchlings observed in Anamur – Oren nesting beach . Note that comments added to the post includes additional video of the same event.

<https://www.facebook.com/share/v/VhUrAtSiHQhhC3F6/?mibextid=WC7FNe>

[R16] News and publications about the initiative to open stone, coal, marble and dolomite quarries in the region

<http://www.haberanamur.net/46953/tas-ocaklarina-karsi-direnis-devam->

[ediyaor/?fbclid=IwY2xjawGJIvdleHRuA2FlbQIxMAABHeG54cSSUosog1jYXJSJFAupBot-mFNUq_WAE6cpniOkqdXNT6YgfEOGuw_aem_F13NIHVYIVhsN-pq53nMfg](http://www.haberanamur.net/46953/tas-ocaklarina-karsi-direnis-devam-)

https://www.facebook.com/story.php?story_fbid=1711638746346646&id=100025016101730&mibextid=WC7FNe&rdid=Hr0uBKzj2zucDcHO#

https://www.researchgate.net/publication/385241977_ANAMUR_ILCESI_EMIRSAH_VE_OVABASI_DOLOMIT_OCAGININ_CEVREYE_ETKILERI

<https://www.facebook.com/100069901083569/posts/842458264760869/?mibextid=WC7FNe&rdid=zYLzVXXISh0D0EDc>

<https://www.mersinhaberci.com/haber/54196/anitlida-ki-mermer-ocagi-yargi-eliyle-durduruldu.html>

<https://www.facebook.com/100069901083569/posts/452066793800020/?mibextid=WC7FNe&rdid=kVNknGLzmg00KnkY#>

<https://www.uyan32.com/mermer-ocagi-ruhsatini-iptal->

[edildi?fbclid=IwY2xjawETDK9leHRuA2FlbQIxMQABHQci90eJrDQfOnQtS7AS5J2fEVqS2Of7EyqXpUnqemR5j-PVIDmC7dk4Q_aem_BnNIgE-S4icp1Funod6zcg&sfnsn=scwspwa#lz5hjn9pzzexds20h4](https://www.uyan32.com/mermer-ocagi-ruhsatini-iptal-)

[R17] Various reports of mass fish, frogs and sea animals have found dead in area streams

Sultan Rivulet (at the west of Anamur)

<https://www.facebook.com/reel/1245835739772606>

<https://www.facebook.com/iceltv/videos/ekspres-haber-2-18092017-anamurda-bal%C4%B1k-%C3%B6l%C3%BCmleri-korkutuyor-mersinde-18-gemi-bat/1923665767897920/?Timeframe=00:00-00:13>

Mamure Castle Region (at the east of Anamur):

<https://www.dailymotion.com/video/x615xzz>

[R18] A Nile turtle (*Trionyx triunguis*) individual caught during channel cleaning activity in the Akdeniz Neighborhood

<https://www.instagram.com/reel/C-sFqtzMVGU/?igsh=MzRIODBiNWFIZA%3D%3D>

- July 2024 -

UPDATE REPORT BY THE NGO

Marine Turtle Conservation in the Mediterranean

**LOGGERHEAD SEA TURTLE (*CARETTA CARETTA*),
GREEN TURTLE (*CHELONIA MYDAS*) &
AFRICAN SOFT SHELL TURTLE (*TRIONYX TRIUNGUIS*)
CONSERVATION MONITORING IN ANAMUR, MERSIN, TÜRKİYE**

31 July 2024

Document prepared by

MERÇED - Mersin Environment and Nature Association Deputy

& presented by

MEDASSET - the Mediterranean Association to Save the Sea Turtles

for the Autumn 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 Autumn Bureau Meeting of the Bern Convention (September 2024) on the conservation status of loggerhead (*Caretta caretta*) & green (*Chelonia mydas*) sea turtle nesting beaches and habitats of the African soft shell turtle (*Trionyx triunguis*) in Anamur, Türkiye. The MEDASSET on site survey was funded through a grant from Aktionsgemeinschaft Artenschutz (AGA), www.aga-artenschutz.de.

Contents (also available [here](#)):

- *SUMMARY*
- *ANNEX 1: MEDASSET's OSA REPORT*
- *ANNEX 2: PHOTOGRAPHS of the MEDASSET's OSA*
- *ANNEX 3: ADDITIONAL REPORT FOR ANAMUR NESTING BEACH*
- *ANNEX 4: PHOTOGRAPHS of the ADDITIONAL REPORT*
- *ANNEX 5: REFERENCES*

1. SUMMARY

This report covers the updates since the last report submitted for Spring Bureau Meeting ([T-PVS/Files\(2024\)6](https://www.pvs.org/files/2024/06)).

As a result of the elections held on March 31, 2024, the political party and the Mayor governing the Anamur municipality changed. We hope that the new administration will not make the mistakes made by the former mayor. MERÇED will continue to monitor the new Mayor's and his team's actions, give advice if requested by the local authorities and report to the Standing Committee of the Bern Convention.

MEDASSET organized an On Site Appraisal (OSA) by a sea turtle expert in Anamur SPA in 29-30 June and 1 July 2024. This was prior to the Bern Committee organized OSA (BCOSA). MEDASSET's report on the conservation status of the Anamur nesting beach is attached in Annex 1 and photos of this report are provided in Annex 2. This report highlights the fact that most issues included in the previous NGO reports have not been corrected, including light pollution, illegal vehicle entry to the beach, expanding businesses, stone walls alongside the *Trionyx triunguis* habitats (Dragon river and Sultan Stream) etc.

MEDASSET's OSA was followed by the Bern Convention expert's OSA (BCOSA) which took place 2- 4 July 2024. MERÇED as well as representatives from the local authorities and the central government participated in the BCOSA. MERÇED's observations during and after the BCOSA are presented in Annex 3 and the related pictures in Annex 4. During the BCOSA, a *Trionyx triunguis* was observed swimming in the Dragon river and nests of *Caretta caretta* and *Chelonia mydas* were also identified. During the BCOSA all parties discussed possible solutions to the issues. There was no communication and collaboration between the authorities and local NGOs until this BCOSA event, which enabled all parties to directly share their thoughts and perspectives with each other. The parties began evaluating problems and possible solutions to better protect and monitor the nesting beach. This is a promising outcome, which we hope will continue and that it was not just a show during the BCOSA.

This concern is driven by the fact that the corrective actions taken by the authorities on the beach prior to the BCOSA (for example, taking back the beach furniture, warning businesses to comply with the rules defined in the circular, etc.) have returned to the former state after the BCOSA team left Anamur. This situation discourages our hopes that corrective actions will be permanent.

In our detailed reports in Annex 1, 2, 3 and 4, we report on some positive progresses, such as the cancellation of the drilling permits on the nesting beach, which was part of the planned geothermal power plant. However, we also report on new negative developments and observations:

- 1) Plowing the beach with construction equipment for "cleaning and organizing" purposes in April,
- 2) Caravan camping work on the beach near Dragon River,
- 3) Concrete building construction and burial of a septic tank in the coast of the Anemurion Ancient city, which is a nesting beach and a 1st Degree Archaeological Site.
- 4) Negative effects of the stone walls and illegal huts in the Sultan Stream on the habitat of African soft shell turtle. (Ref: Annex 5 -[R1], Ref2, Ref3)

MERÇED and MEDASSET call upon the authorities to:

23. Ensure that local authorities and local businesses comply with the Turkish National law (Circular # B.18.0.DMP.0.01.03 - Ref: Annex 5-[R11]) and the Bern Convention's Recommendation No. 66 (1998),
24. 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). Businesses should be disciplined so that they stop to commit violations,
25. Allocate more staff and work with experts from a university, to ensure efficient and significant prevention, monitoring and data collection is performed,
26. Immediately establish the sea turtle commission, as decided during the BCOSA, and operate it effectively. Reported violations to the commission should be resolved effectively and in a timely manner,
27. Ensure that the positive cooperation and communication established with local NGOs during the BCOSA process continues,
28. Update the Ministry's National Biodiversity Inventory records to collect and include Green turtle's (*Chelonia mydas*) and African soft shell turtle's (*Trionyx triunguis*) data,
29. Rehabilitate the stone walls alongside of the Dragon River, Sultan Creek and Sarisu Creek that cause irreversible damage to the living environment and seriously affect the nesting activities and habitats of African soft shell turtles,
30. Fix the lighting of parks, tourism businesses, official premises, street lamps and apartment complex's lamps on the entire nesting beach. Especially the newly built Beach Arrangement Project (Devlet Bahçeli Park) and the Port (Iskele) region, should be evaluated in terms of the color, intensity, frequency and direction of the lighting, and necessary changes should be made,

31. Stop illegally taking sand from the beach. Punish people/institutions that take illegal sand from the beach in a way that will provide deterrence,
32. Install permanent barriers to prevent illegal vehicle access to the beach in the Dragon and the Cerenler region, (This situation not only causes cars to enter the beach, but also causes crowded groups to come to the beach late at night, playing loud music from the car, causing glare with headlights, and night visitors leaving a lot of garbage behind, including broken glass bottle pieces),
33. The caravan area in the Dragon area and the iron profiles to establish the jet ski renting facility should be removed,
34. Remove the reinforced concrete building and the toilet area within the 1st degree archeological protected area and the 1st degree nesting protection zone in Anemurium Ancient City (Ören). Area should be rehabilitate to its natural state,
35. Ensure that the data collection process on sea turtle nests follows international protocols, (For example, GPS data of the nests should be recorded.)
36. Ensure that the restaurant that builds bungalow houses, plants grass, creates a walnut garden by pouring soil on the sand on Karaağaç beach, comply with the rules defined with the Circular, (Ref: Annex 5 - [R14])
37. Fix the showers in Beach Arrangement Project (Devlet Bahçeli Park) to prevent water flows to the beach,
38. Remove the concrete floor in front of the Teacher's Guest House that narrows beach and causes nests to be submerged, (Ref: Annex 4 - Fig. 1f)
39. Release more water from the Hydroelectric Power Plant in Dragon Stream. Sedimentation flow must be ensured,
40. Provide sea turtle awareness and protection training to all municipal and government office employees (including cleaning personnel, construction workers, gardeners, electricians, technicians, excavator operators, etc.) who work at the beach or whose work interacts with the beach,
41. Publish the number of nests marked by the Nature Conservation and National Parks authority on the Anamur nesting beach separately, according to the sections of the beach and all existing sea turtle species (Loggerhead sea turtle (*Caretta caretta*), green sea turtles (*Chelonia mydas*) and African soft shell turtles (*Trionyx triunguis*). This information is requested for the past 5 years and future years,

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

2. Encourage authorities to implement the necessary actions listed above.

Annex 1: MEDASSET's DETAILED REPORT OF 2024 FOR ANAMUR SPA, TURKEY

An onsite survey was conducted by MEDASSET in Anamur SPA in 29-30 June and 1 July 2024 to assess and document the management and conservation status of the nesting beaches. The survey was funded by MEDASSET through a grant from Aktionsgemeinschaft Artenschutz (AGA), www.aga-artenschutz.de. Three days of fieldwork were carried out both during the day and at night. All of the deficiencies pointed out in the written reports of the complainants were observed on the spot. The serious problems previously identified and reported to the Standing Committee remain. Our alarming findings about the current situation of the beach are presented under the headings below.

During the 2024 nesting season, Anamur nesting beach lacked regular and standardized monitoring. Although The Nature Conservancy and National Parks assigned staff for nest counting and caging, their numbers were insufficient given the beach's length and nesting density. To address this, professional and academic support is essential.

Notably, the area between the Dragon River and Mamure Castle exhibited a high nest density. In other beach sections, nest density increased in areas shielded from light and noise pollution. As of the onsite survey date, an estimated 1200 nests existed, with the potential for this number to approach 2000 if the nesting season continues.

Evaluations about the current situation of the beach are presented under headings.

17. Illegally filled site in Karaağaç

The government reports that artificial factors illegally created on the beach were removed and it was reported that the beach was rehabilitated (Files32e_2022_Turkey_Mersin Anamur Beach_Govt-report). During our survey, it was observed that the specified area is self-repairing with dune movements. However, even though the soil that was brought to the beach has been removed, the vegetation has changed with the effect of the sand brought in before.

The natural vegetation around the rehabilitated stream is still preserved. The water height and width of the stream though are not suitable for the African Soft Shell Turtle (also known as Nile soft shell turtle).

Considering the satellite images and the situation during the field visit, we hope that the dune area and the small stream behind it will regain its natural structure over time.

The most serious threat during this season is the expansion of the beach facility in the area and its proximity to the sea. Large number of trees (walnut saplings) were planted right next to the facility. An irrigation system was installed. Soil was brought to grow the trees and piles of soil are still visible. A prefabricated bungalow was built at the end of the wooded area. We are afraid this area will be used for bungalow tourism, which has been very popular in recent years. These activities in this section should be terminated immediately, the newly planted plants should be removed, the soil brought from outside should be removed, the rehabilitation of this part of the beach should be started immediately at the end of the nesting season, and the use of the beach by the tourism facility should be regulated.

Figure 1 in Annex 2 shows the relevant photographs.

18. Beach Arrangement Project

History of the project:

The National Real Estate Department of the government allocated some of the areas at the shoreline to the Anamur Municipality to be used for a Beach Development Project on 20/2/2020:

- The first part of the allocated area is from Taşlık region to Aslıhan Hotel which covers a total of 95,000 m² of “Dune Land”. The municipality is carrying out construction in incremental phases. The first phase of the project was completed between September 2021 to May 2022. The second phase of the project started in October 2022 and it continued as of July 2023.
- The second part of the allocated area is in the Karağağaç region which covers 4.660 m² of “Dune Land”. The length of this area is about 250 m. This is the same area where the Picnic Area construction has been carried out 4 years ago. Although some insufficient rehabilitation is done, the area is still allocated to the Municipality.

Current situation as of July 1, 2024:

The beach arrangement project carried out by the Anamur Municipality, and the related activities are in violation of the 2009/10 circular:

- Construction activities which are forbidden on nesting beaches between May 15 and October 1.
- Planned beach organization within the 1st protection area (0-65m from sea).
- The lighting used in the areas where the beach arrangement has been completed seriously affect sea turtles. The lights are very intense, mismatched in color and visible from the beach.

In addition to the above violations, it is clear that the soil used, especially for filling, negatively affects the dune structure of the beach. There is intensive grass and walnut tree planting in this area. This artificial interaction and the accompanying irrigation and fertilization works seriously threaten the natural structure of the beach.

Recreational areas already or to be established within the scope of the project increase the pressure of use on the beach. The intensity of use in the first protection zone has increased, in addition to this, artificial lights, umbrellas, sun loungers and noise pollution seriously affect sea turtles.

Within the scope of the beach arrangement project, it has been determined that additional facilities have been put into operation compared to last year. The lighting, location, beach use and working hours of these facilities seriously affect sea turtles. The number of visitors increases at night due to the activities of the facilities. With the existence of lighting, people's use of the beach at night also increases. There is no screening in front of the visitors' parking lots to prevent vehicle lights from reaching the nesting areas.

Conclusion:

- The beach arrangement project must be completely stopped.
- Light and noise pollution from existing facilities must be prevented and beach use must be regulated.
- Water from showers must be disposed of properly.
- The light effect of vehicle parking points must be eliminated.
- Facilities and structures in the 1st protection zone must be removed.
- Figure 2 in Annex 2 shows the relevant photographs.

19. Sand extraction

Sand extraction was observed in one location during the survey. It is clear that the facilities established within the scope of the beach arrangement project have a significant impact on the beach, through beach leveling and grass planting. These interventions on the beach must be immediately stopped.

Dune disturbance was detected at Anamur Public Beach, in what we believe is the construction of a caravan park (Figure 3, Annex 2).

20. Illegal vehicle access to beach

Illegal vehicle access was reduced compared to the previous year, except for Karaağaç and the ancient city of Anamurium. A ditch was dug to prevent vehicle entry to the Phase 3 area of the beach arrangement project, which has been left vacant so far. However, some points were left open for vehicle entry. Images of vehicle entrances are presented in Figure 4, Annex 2.

21. Light pollution and sound pollution

Serious light and sound pollution was detected. The extent of light and sound pollution, caused by street lighting, restaurants and entertainment venues operating on the beach, within the scope of the beach arrangement project, is alarming. The lights of the facilities are kept on until very late at night. The lighting of the parks and walking paths remain on all night. Lights are intense, wrong color and their positions are inappropriate. They directly affect the nesting beach. Lighting was recently added to the operational harbor. Only one light on the beach was eliminated since our last year's report. The use of land slated for Phase3 as a parking lot at night and the impact of vehicle lights on the beach were identified.

Images of light pollution are presented in Figure 5, Annex 2.

22. Expanding businesses on the nesting beach:

There are many facilities (restaurants, beach clubs, cafeterias, bungalows etc.) on the beach. The management of beach furniture of these facilities does not comply with any rules. They are not collected and are left in place at night. They are positioned in a way which interferes with nesting. It was observed that the facility providing accommodation and restaurant services in Karağaç has created a new walnut plantation area with an irrigation system. It is clear that the facility has significantly expanded its capacity and area. There are two camping grounds in the area of Mamure Castle. Although these camping grounds are located at a safe distance from the nesting beach, it was observed that they have planted palm trees and built small houses. The increasing number of visitors and the amount of sun loungers and umbrellas in these campsites show that they are trying to expand. There are also indications that fires are lit on the beach at night in areas with such facilities. People were camping on the beach. It was observed that one establishment had smoothed the beach. There is an increase in the number of umbrellas and sun loungers. Photos of the increasing number of facilities and their impacts on the beach are presented in Figure 6, Annex 2.

23. Stone Wall Built Alongside The Dragon River

The stone wall along the Dragon River has caused serious habitat destruction, especially for the African Softshell Turtle (*Trionyx triunguis*). Fewer individuals were detected during field surveys compared to last year. African Softshell Turtle nest predominantly on sand banks along the riversides. The stone wall built along the Dragon River has completely destroyed the habitat used by this species for nesting. Tracks of African Softshell Turtle were also found in the Durağan Stream, east of the Dragon River, during the survey this year. The African Softshell Turtle activity this year is well below the previous year. Photos of the stone wall and African Softshell Turtle tracks are presented in Figure 7, Annex 2.

24. Geothermal drilling

No activity was observed on the beach in relation to this.

25. New problems identified

- In the previous years, before the reclamation of the Dragon River side with a stone wall, the barracks standing there were removed. Barracks are now built on the Sultan Stream, in an area which is a suitable habitat for African Softshell Turtle.
- Sand is piled on the empty field behind the rehabilitated area in Karaağaç.

Photos of these new problems are presented in Figure 8, Annex 2.

Annex 2: PHOTOS OF MEDASSET'S ANAMUR 2024 FINAL REPORT (available [here](#))

Annex 3: MERCED'S ADDITIONAL REPORT FOR ANAMUR NESTING BEACH

The updated statuses of the previously reported issues are presented at MEDASSET's OSA (On-spot Appraisal) report in Annex 1 and Annex2. This annex is a complementary document by MERCED to Annex 1 and Annex 2 to present the information not included in MEDASSET's OSA report. It includes information gathered after MEDASSET's OSA, during the Bern Convention's OSA (BCOSA) and information gathered after the BCOSA was completed. The list of the issues presented in this annex is given below:

- Bern Convention's OSA (BCOSA)
- Concrete building construction and installation of a septic tank in the Anemurium Ancient city
- The stone walls alongside the habitats of the African soft shell turtle (*Trionyx triunguis*) and illegal huts on the Sultan Stream,
- Plowing of the beach with construction equipment for "cleaning and organizing" purposes
- Caravan camping work on the beach near Dragon river
- Geothermal Drilling License
- The dam built on the Dragon River does not release enough water
- Expanding businesses on the nesting beach
- Insufficient Monitoring and Protection Status
- Communications and collaboration

Details of the above issues are detailed in following sections:

1. Bern Convention's OSA-2-4 July 2024

The BCOSA was very well organized. MERCED appreciates all the participants' (Bern Convention, MEDASSET, scientific experts, Municipality representatives, Ministry representatives and NGO representatives) efforts to make the BCOSA a productive and solution-oriented activity. The visited areas during the BCOSA were the location between Pier (Iskele) and Taşlık region, the Beach Development Project area (Devlet Bahçeli Park), Cerenler, Karaağaç, Sultan Stream, Anemurium (Ören) and the Mamure Castle. The habitats of loggerhead sea turtle (*Caretta caretta*), green sea turtles (*Chelonia mydas*) and African (Nile) soft-shelled turtles (*Trionyx triunguis*) were observed. Some sample portions of the beach were visited during night to observe light pollution. Photographs of the BCOSA are presented in Figure 1, Annex 4.

The highlights of the BCOSA are listed below:

- There was good communication and collaboration between all parties during OSA. Productive conversations occurred to better protect and monitor the beach.
- A *Trionyx triunguis* turtle was observed in the Dragon River. (Ref: Annex 4 - Fig. 1a) We were informed that this species is not in the Ministry's National Biological Diversity Inventory, and therefore it is not monitored (no data collected) due to lack of personnel. It was stated that it is difficult to locate

the *Trionyx triunguis* nests, since it requires special training. The Ministry's National Biological Diversity Inventory must be updated to collect and include data on the *Trionyx triunguis* turtle!

- Some green sea turtle (*Chelonia mydas*) nests were detected during the BCOSA as well as many *Caretta caretta* nests.
- Around eight nest exit traces were observed only in the sampled visited areas during the BCOSA. This indicates that nesting had started at the end of April. However, according to the Circular # B.18.0.DMP.0.01.03, the nesting season starts on May 15 in terms of protection and monitoring studies. There is a great need to amend the circular. (Alternatively, the authorities need to start the measurement earlier than the Circular states.)
- Businesses which have sun loungers and other beach furniture on the beach had them removed prior the BCOSA. However, they moved the furniture back to the original positions as soon as the BCOSA team left. (Ref: Annex 4 - Fig. 2)
- A very high percentage of unmarked / uncaged nests were seen.
- It was observed that the concrete wall built in the Teacher's Guest House narrowed the beach very much, therefore most of the sea turtle nests were at risk of being submerged, and there was also a very intense water flow to the beach during the washing of the concrete stage. (Ref: Annex 4 - Fig. 1f)
- Especially around the Teacher's Guest House, nests were seen very close to the shore line and they will most likely be submerged under seawater during the high tides. However, we were informed that the nest moving process could not be carried out very often because the nest moving process took a long time and the current staff could not even keep up with the existing nests' marking. The nests close to the shoreline that could be saved by relocating to a safe place were abandoned to their fate.
- During the night, it was observed that the lights in the Coastal Development Project's, Pier's and businesses at the beach were too frequent, bright and intense, and their use of colors was inappropriate. Also some street lamps and some apartment blocks' lightning were facing the sea. Their direction needs to be reversed. The lighting of the whole coast line needs to be reviewed. (Ref: Annex 2 - Fig. 5)
- The condition of the stone walls and huts in the Sultan Stream area was observed. This area is one of the four places where *Trionyx triunguis* turtles nest. (Ref: Annex 5 - [R1]) The illegal hunts and barracks had been removed from Dragon River, a few years ago. It is observed that those illegal constructions are located at the Sultan Stream (Ref: Annex 4 - Fig. 4d-4e)
- In Karaağaç region, a business owner was seen planting grass on the beach, pouring soil on a part of the beach, installing watering pipelines and fertilizers to establish a walnut garden, and they built bungalow houses. (Ref: Annex 4 - Fig. 1e)
- In Dragon and Karaağaç regions, there are many spots where you can drive to the beach without any barriers. (Ref: Annex 2 - Fig. 4)
- In Anemurium (Ören), it was observed that there was a healthier ecosystem in terms of sand and vegetation richness in places where there is less or almost no human intervention. However no cage or marking is observed although foot prints of sea turtles are observed. (Ref: Annex 4 - Fig. 1h)
- A very dense nest presence was observed in the Mamure Castle area. Many nests were not caged. (Ref: Annex 4 - Fig. 1i)

2. Concrete building construction and installation of a septic tank (toilet) in the Anemurium Ancient city which is a nesting beach and a 1st Degree Archaeological Site.

The Anemurium Ancient city is the west border of the Anamur nesting beach. This site is protected as a 1st degree archaeological site and it is also one of a few well protected areas in the nesting beach, since this area is closed to settlement and away from human influence. Historical restoration works were being carried out for long time in this archaeological site.

We were informed that the construction works are being carried out in the name of "landscaping and social facilities" on the beach of Anemurium Ancient City. Photographs are provided in Annex4-Figure 3 and videos are available at the Facebook account of "Anamur Environment Platform" (Ref : Annex 5 - [R13])

The company that won the construction tender, as can be seen from the referenced video (Ref : Annex 5 - [R13]) shot about a month ago], excavated using heavy machines in an area approximately 25-30 meters

away from the beach, where there are archaeological ruins, as well. They built a raft foundation which is contrary to the decision of the Adana Cultural and Natural Heritage Preservation Board. They started a reinforced concrete construction and dug a 3-4 m deep septic tank to be built on the western side of the building. Now the septic tank is covered with plywood to hide. (Ref : Annex 4 - Fig 3d)

Following the reactions and objections to the concrete construction, the illegal building's upper flat is removed, but the cement foundation and the septic tank were left behind. It is highly likely that the construction will continue in accordance with the board's decision. The coastline of the Anemurium ancient settlement had also been declared a natural protected area in accordance with the decision of the Presidency of the Republic of Turkey. In other words, archaeological and natural protected areas overlap. This coast is also protected by the Circular # B.18.0.DMP.0.01.03, about the protection of the sea turtles. The coast line just beyond the construction site goes all the way to the Sultan Stream. The area hosts sand lilies and other dune plants and sand dunes on the beach. Since this area has been well protected for hundreds of years, it has remained preserved until today. Opening this special area to construction activities under the name of serving and promoting tourism is against the rules of domestic law and the international regulations (Bern and Lahey Convention).

Public entrance to the ancient city is forbidden. Recent photographs presented at Annex 4 - Figure 3 do not show any cage marking. Most probably even the Nature Conservation and National Parks officials may not be able to enter the beach and mark, count nests.

3. The stone walls alongside the habitats of the African soft-shell turtle (*Trionyx triunguis*) and illegal huts on the Sultan Stream

According to academic publications (Ref: Annex 5 - [R1], [R2], [R3]), African soft shell turtles (*Trionyx triunguis*) were reported in four areas in Anamur between 2006 - 2007. These places are: Dragon Rivulet, Sultan Stream, Sarisu Stream and the Durağan wetland region between Dragon River and the Mamure Castle. Three of these four areas were recently covered with stone walls after this data collection period. The stone walls are not aslope enough, the stones pieces are too big and there are gaps in between stones. This situation causes no turtle species to be able to climb up for nesting. Those walls have destroyed their nesting habitats. After the data collection activities by academics, (in 2006, 2007) no significant academic research was conducted to follow up the latest situation. In addition, government officials stated during the OSA that no data was collected on the *Trionyx triunguis* sea turtles in Anamur, because this species was not included in the National Biodiversity Inventory records. In addition, the authorities admitted that there is no available human resource to collect data for *Trionyx triunguis*.

We urge the authorities

- to assess the government's National Biodiversity Inventory records based on the academic publications,
- asses an urgent appraisal to collect latest status for this year,
- include African soft shelled turtles in the regular data collection process,
- increase man-power and provide training to collect data for African soft shelled turtles,
- Assess the stone walls built alongside the Dragon River, Sultan Stream, Sarisu Streams and make appropriate changes on the construction to let the sea turtles climb and make nest, (If necessary, get consultancy regarding the conditions that the wall must meet to let the turtles climb up)
- Remove the barracks built on the Sultan Stream.

Related photographs are presented at Annex 4-Figure 4.

4. Plowing the beach with construction equipment for "cleaning and organizing" purposes in April 2024

The Municipality's construction machines that can dig deep plowed the sand on the Anamur nesting beach as if it was a farm field in April 2024. The Municipality undertook this activity under the name of "beach landscaping, cleaning and preparation for the summer". Authorities claim that there is no problem because it was not done during the nesting season. However, this should not be done at any time of the year, as this activity harms the ecosystem consisting of every living thing from microorganisms to dune plants and vegetations that keep the beach healthy.

During the BCOSA, eight nest exit footprints were observed on 3rd of July. This means that nesting started at the end of the April. (Note that according to the Circular # B.18.0.DMP.0.01.03, nesting season starts on 15th of May, which is not valid for all regions and must be amended.)

Related photographs are presented at Annex 4-Figure 5.

5. Caravan camping work on the beach near Dragon river

During the nesting season, in the area close to the junction point of the Dragon River and the sea, a construction has started on the 25.06.2024. Initially construction machines entered the nesting beach. They altered the dune surface and made it flat. Then they cut the reeds and poured pebbles on the sand. A few days later caravans were seen parked in the area. It is not known whether this portion of the beach has been converted into a caravan park area permanently or whether it is a temporary situation.

Related photographs are presented at Annex 4-Figure 6.

During the BCOSA, these caravans were not there. MERCED will monitor if the caravans will come back again.

6. Geothermal Drilling License

Initial plan of the Geothermal Power Plant had covered three drilling points. One at the nesting beach and two at the mountains further from the beach. During the BCOSA, the authorities stated that the plan is updated to remove the point at the nesting beach. This is a positive progress. MERCED will continue monitoring the progress on this issue.

7. The dam built on the Dragon River does not release enough water.

There is a Hydroelectric Power plant on the Dragon River. Since this dam does not release enough water and the sediment does not flow into the sea, the gravel formation on the beach has increased. This situation causes the beach ecosystem to deteriorate and nesting is hindered for sea turtles.

8. Expanding businesses on the nesting beach:

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

Before the BCOSA, most of the businesses moved their beach furniture away from the shoreline and they decreased the number of sun lodgers to occupy less space at the beach. However, after the BCOSA was completed, everything went to the previous state. Photographs of this situation are given at Annex 4 - Figure 2.

Authorities walk the beach every day to mark nests but they do not impose any fine or warn the violators to establish a permanent solution to this problem.

Karaağaç Beach & Restaurant is one of these businesses. They grew grass on the beach, and they installed many bungalow houses. They poured soil over the sand and used an irrigation system and fertilizers and planted hundreds of trees to turn the beach into a walnut tree plantation. They placed sun loungers, umbrellas, tables, etc. on the beach within 20-30 meters away from the shoreline. The owner of the business claims that this portion of the beach is his own land. The authorities should investigate the legality of the work he has done at the 1st Degree Protection Zone of the nesting beach.

Photographs of the walnut plantation in the Karaagac beach are provided in Annex 4 - Figure 8.

The Karaağaç Beach & Restaurant Instagram account provides additional videos and photographs of the facility (Ref: Annex 5 - [R14] -<https://www.instagram.com/karaagacbeach/>)

This business is not the only one that occupies the nesting beach. There are many businesses in the Beach Development Project area and in the Pier (Iskele) region. The photographs of all these businesses are given in previous reports. The beach furniture management of all these facilities does not comply with any rules. The businesses keep beach furniture at the beach during the day and night. All of these businesses cause large amounts of noise and light pollution until late hours.

All these activities negatively affect the sea turtles' chances of nesting.

9. Insufficient Monitoring and Protection Status

There is no regular and scientific monitoring study on the Anamur nesting beach. The Nature Conservancy and National Parks have assigned only 1-2 people 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. Monitoring, conservation, and raising awareness work should be carried out with additional professionals, academic support and volunteers.

During the BCOSA, this issue was raised. It has been proposed to local authorities to provide accommodation areas for volunteers and meet the logistical needs of this future volunteer team, which will monitor and protect the beach. Then national and international volunteers and funds will be sought. Officials promised to consider this offer. It was recommended that the volunteers receive training by the National Sea Turtle Scientific Commission or a qualified NGO such as DEKAMER, EKAD, and WWF-Türkiye to train volunteers before starting their duties in Anamur.

This issue was brought up during BCOSA. It was recommended to local governments to meet the logistical needs of this volunteer team that will inspect and protect the beach and to create accommodation areas for the volunteers. National and international volunteers and funds will then be sought. Officials promised to consider this offer.

10. Communications and collaboration

Before the BCOSA, there was not sufficient communication and collaboration between the authorities and the NGOs. A positive communication was established during the BCOSA. MERCED hopes that this positive situation will be permanent and will help to effectively protect the area.

11. Green sea turtle (*Chelonia mydas*) Observations

During the BCOSA, Green sea turtle (*Chelonia mydas*) nests were observed in the Dragon beach. After the OSA, people living at the Oren region recorded Green sea turtle hatchlings videos on 27.07.2024. (Full video reference is in Annex 5 – [R16]) Screenshot of the video and map of the location are available at Annex 4 – Figure 9.

ANNEX 4: MAPS and PHOTOGRAPHS (available [here](#))

ANNEX 5: REFERENCES

Anamur: REPORTS & COMPLAINT SUBMITTED TO THE BERN CONVENTION

Available online at www.medasset.org or 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

T-PVS/Files(2024)31 - Government Report

T-PVS/Files(2024)6 - Complainant Report

RELEVANT RECOMMENDATIONS OF THE STANDING COMMITTEE:

Rec. No. 7 (1987) on the protection of marine turtles and their habitat

Rec. No. 8 (1987) on the protection of marine turtles in Dalyan and other important areas in Turkey

Rec. No. 12 (1988) concerning the protection of important turtle nesting beaches in Turkey

Rec. No. 24 (1991) on the protection of some beaches in Turkey of particular importance to marine turtles

Rec. No. 66 (1998) on the conservation status of some nesting beaches for marine turtles in Turkey

Academic Publications Related with Sea Turtles in Anamur, TURKEY

[R17] Aşkın Hasan UÇAR and Serap ERGENE, (2022), First data on African (soft shell turtle (*Trionyx triunguis*)) nests on Anamur Beach in Mersin on the eastern Mediterranean coast of Türkiye;: https://biozoojournals.ro/bihbiol/cont/v16n2/bb_e221305_Ucar.pdf

[R18] Max Kasparek (2000) - Status of the Nile Soft-shelled Turtle, *Trionyx triunguis*, in Turkey: An assessment in the Çukurova Delta with Recommendations for Conservation Management – January 2020 - Report for the 20th Meeting of the Standing Committee of the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) Affiliation: MEDASSET / Council of Europe

https://www.researchgate.net/publication/289968156_Status_of_the_Nile_Softshelled_Turtle_Trionyx_triunguis_in_Turkey_An_assessment_in_the_Cukurova_Delta_with_Recommendations_for_Conservation_Management/citations

[R19] Aşkın Hasan UÇAR (2008) Investigation of Biological Properties of Sea Turtles *Caretta caretta* and *Cheloniemydas* and Soft Shell NileTurtle *Trionyxtriunguis* Populations and Anamur Nesting Beach Properties. Ph.D. Thesis. Mersin University, Institute of Science and Technology, Department of Biology. Thesis Advisor Dr. Serap Ergene, Mersin, December 2008

Prof. Dr. İbrahim Baran and Dipl.-Biol. Max Kasperek, 1989, Marine Turtles Turkey. Status survey 1988 and recommendations for conservation and management.

[R20] Casale P., Boderick A.C., Camiñas J. A., Cardona L., Carreras C., Demetropoulos A., Fuller W. J., Godley B. J., Hochscheid., Kaska Y., Lazar B., Margaritoulis D., Panagopoulou A., Rees A. F., Tomás J. & Türkozan O. (2018) ‘Mediterranean sea turtles: current knowledge and priorities for conservation and research’

https://www.researchgate.net/publication/326775961_Mediterranean_sea_turtles_current_knowledge_and_priorities_for_conservation_and_research

Supplement : https://www.int-res.com/articles/suppl/n036p229_supp.pdf (Table S9, S15, S18, S20 defines Caretta caretta numbers)

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[R23] IUCN MTSG report Sea turtles in the Mediterranean, 2010: distribution, threats and conservation priorities <https://portals.iucn.org/library/efiles/documents/2010-012.pdf> (Turkey section is given in pages 257-293. Authors for “Turkey” section : Oğuz Türkozan and Yakup KASKA)

[R24] Peter Paul van Dijk, Tomas Diagne, Patrick Joseph Baker, Ertan Taskavak, December 2017, Trionyx triunguis. IUCN Red List Assessment https://www.researchgate.net/publication/323990667_Trionyx_triunguis_IUCN_Red_List_Assessment

[R25] Hochscheid et al. (2018). Sea Turtles in the Mediterranean Region: MTSG Annual Regional Report https://mtsg.files.wordpress.com/2018/11/mtsg-annual-regional-report-2018_mediterranean.pdf

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[R26] Circular # B.18.0.DMP.0.01.03 / 831.02 dated October 2009 - About the protection of the sea turtles, Released by the General Directorate of Nature Conservation and National Parks of the Ministry of Environment and Forestry. [https://kms.kaysis.gov.tr/\(X\(1\)S\(pvtdfjxi5h25d2jwtaoqoy4\)\)/Home/Goster/56800?AspxAutoDetectCookieSupport=1](https://kms.kaysis.gov.tr/(X(1)S(pvtdfjxi5h25d2jwtaoqoy4))/Home/Goster/56800?AspxAutoDetectCookieSupport=1)

[R27] Posts at the facebook account of “Anamur Environment Platform” regarding with the negative issues affecting the Caretta caretta nesting or the hatchlings
<https://www.facebook.com/share/r/wDW3YrMwpjfqbjqZ/?mibextid=UalRPS>
<https://www.facebook.com/share/r/sZX6z43RgCjUxMdH/?mibextid=WC7FNe>
<https://www.facebook.com/share/v/Yv21pXY9yyvvVnpW/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/hYsArz8aMMFhEpGc/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/j7CtM6P152qDriGP/?mibextid=WC7FNe>

[R28] Posts at the Facebook account of “Anamur Environment Platform” regarding with the concrete construction at the Anemurium Ancient City.
<https://www.facebook.com/share/p/wyu79cVm5XUELDzy/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/AVd1riQqbs1kAt77/?mibextid=WC7FNe>

<https://www.facebook.com/share/wMmgNR3wxPNUKpZH/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/tD47gNpav4z4WWxj/?mibextid=WC7FNe>
<https://www.facebook.com/share/RTiEBJnrZuPqCuZr/?mibextid=WC7FNe>
<https://www.facebook.com/share/rAJNgfLbEdd7pHFp/?mibextid=WC7FNe>
<https://www.facebook.com/share/p/CawSAiVmrU6AfLEj/?mibextid=WC7FNe>

[R29] Karaagac Restaurant company's Instagram account : <https://www.instagram.com/karaagacbeach/>

[R30] Post at the Facebook account of "Anamur Environment Platform" regarding with the dead hatchling found in front of Rolli Hotel. This hotel is almost 250 meter far from the shore line:
<https://www.facebook.com/share/r/CmdzjAKSjQxsxDSS/?mibextid=WC7FNe>

[R31] Post at the Facebook account of "Anamur Environment Platform" regarding with the green sea turtle (*Chelonia mydas*) hatchlings observed in Anamur – Oren nesting beach . Note that comments added to the post includes additional video of the same event.
<https://www.facebook.com/share/v/VhUrAtSiHQhhC3F6/?mibextid=WC7FNe>

- February 2024 -

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.

Contents:

- *SUMMARY*
- *ANNEX 1: DETAILED REPORT, MAP & PHOTOGRAPHS*
- *ANNEX 2: REFERENCES*

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.

2. DETAILED REPORT

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

12. 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 Sarsu 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.

13. 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.

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

19. 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.

20. Zoning plan change

There is no progress for this update reporting period on this issue. No information was provided to MERCED 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. MERCED members and many citizens objected to this plan.

21. 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.

22. 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>)

ANNEX 1: MAP and PHOTOGRAPHS



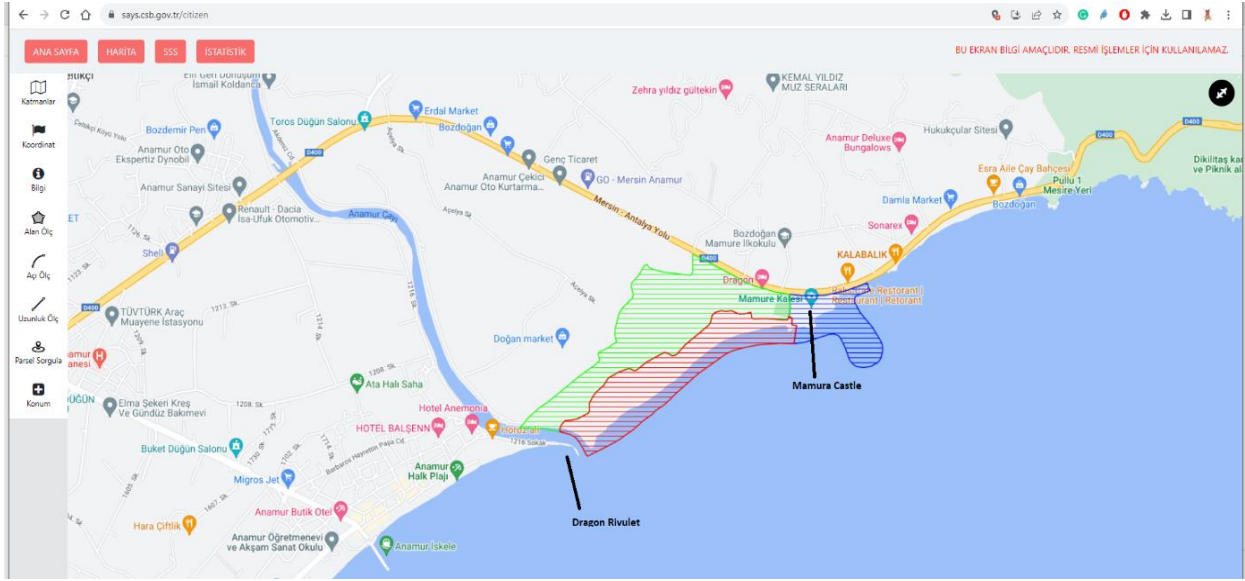
Map 1) Map displaying the coastline of Anamur and the areas affected by major threats to habitat destruction for coastal development plans and tourism activity on the sea turtle nesting beaches - © MERÇED 14 February 2022



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.csb.gov.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



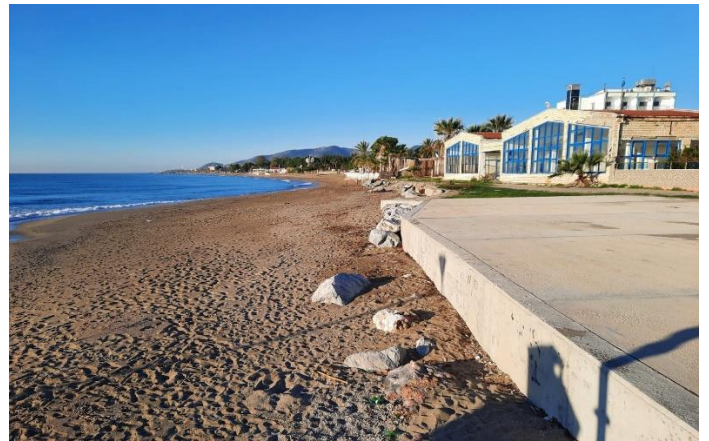
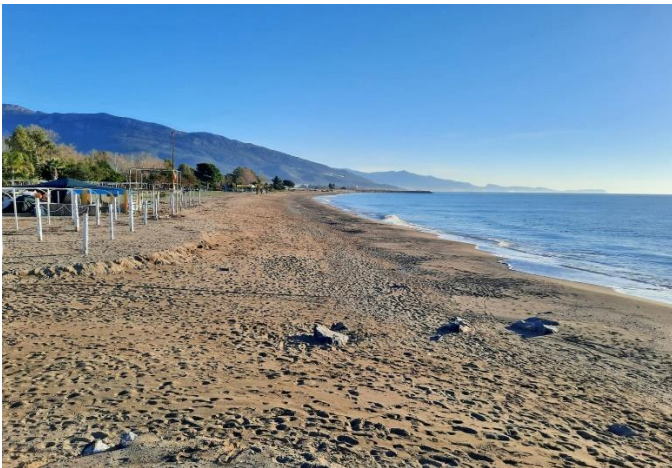
(Fig. 1) Car tire tracks on the beach

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 or 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