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Strasbourg, 23 August 2022

# CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE AND NATURAL HABITATS

## **Standing Committee**

42<sup>nd</sup> meeting Strasbourg, 28 November – 2 December 2022

Possible File: 2019/05

## Habitat destruction in Mersin Anamur Beach (Turkey)

## - REPORT BY THE COMPLAINANT -

Document prepared by the MERCED

#### 19 August 2022

#### 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 2022 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 Bureau Meeting of the Bern Convention (September 2022) 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
- UPDATE ABOUT PREVIOUSLY REPORTED ISSUES
- ADDITIONAL INFORMATION
- ANNEX: MAP & PHOTOGRAPHS

#### **1. SUMMARY**

Since our previous report submitted in February 2022 (T-PVS/Files (2022)33), no developments have been made for the communications and collaboration between the authorities and local NGOs, for the on-going works/ monitoring of the two coastal development projects at Anamur protected sea turtle nesting beach. The full rehabilitation of the illegal picnic area at Karaagac has yet to occur and the construction of the first phase of the Coastal Development Project was completed in May 2022, and the second phase is planned to be started in September 2022. Additionally, violations of the National legislation to protect the sea turtles and nesting habitat continue to occur without any consequence for the perpetrators. Evidence of illegal sand extraction, vehicles accessing the beach, light and sound pollution, and business expansions continue to degrade the nesting habitat and placing the breeding population and hatchlings at risk (Annex-Figure 1).

#### MER<u>C</u>ED and MEDASSET call upon the authorities to:

- Remove soil and trees put on the nesting beach for the "Coastal Development Project". Start the EIA process immediately. Update project for the second phase to be compatible with Coastal Law, Circular # B.18.0.DMP.0.01.03, and international agreements.
- Enforce the full restoration of the Karaagac section to its natural state.
- Dismiss the zoning plan change affecting nesting beach that is approved by the Municipality of the Anamur and the Mersin Metropolitan Municipality.
- Ensure local businesses and local authorities comply with Turkish National law (Circular # B.18.0.DMP.0.01.03) and the Bern Convention's Recommendation No. 66 (1998).
- Collaborate and communicate with the local NGOs.
- Prevent further unsustainable development along the nesting beach of Anamur that shall result in irreversible damage to the habitat and severe impacts on the nesting activity and *Trionyx triunguis*.
- Enforce and penalise 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 etc.)

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

- Encourage authorities to urgently implement the necessary actions listed above.
- Conduct an on-the-spot assessment as soon as possible to collect information needed in order to address the complaint.

## 2. UPDATE ABOUT PREVIOUSLY REPORTED ISSUES

### A. COLLABORATION:

Since our last update (T-PVS/Files (2022)33), no further communication or collaboration from the Authorities with the local NGO's has been made for the Coastal Development Project or any other projects. The representative for the Mersin Provincial Directorate of Environment and Urbanization who had contacted MERÇED in January 2022 and stated they would '*come to Anamur and share information about the Coastal Arrangement Project*' has not been in contact again. Additionally, no response has been provided by the same representative in regards to MERÇED objections for the Coastal Development Project and in particular to areas where its construction has narrowed the nesting beach area, (See Fig 2 for construction photos). Furthermore, the required EIA process for the Coastal development project was carried out without any communication. Further details are provided in the following sections.

## B. REHABILITATION of KARAAGAC PICNIC AREA:

As stated in our previous report (T-PVS/Files (2021)27) most of the soil was removed by the Municipality in the spring of 2021, but no further rehabilitation works have been attempted since. Soil, water pipelines, debris, rubble, rubbish, and stones still remain on the nesting beach (Fig 3). The report produced from the on-the-spot visits by the experts, carried out in March 2021 has not been made available to the NGO's and no other information has been shared in relation to the area's rehabilitation plans or the monitoring of its rehabilitation.

#### C. COASTAL DEVELOPMENT PROJECT

Construction for the Coastal Development Project started in September 2021 and the 1st phase was completed in May 2022 (Fig 4). Phase 1 covers an area approximately 30.000 square meters, stretching 0,75 km along the nesting beach. Phase 2 is planned to be constructed between September 2022- May 2023. It will stretch along approximately 1.1 km of the coastline.

Within Phase 1, a park has been built at the nesting beach, which accommodates pergolas, walkways and bike paths (Fig 4 A & B), showers (Fig 4C), WC, a café-bar, a patisserie, a tea garden and children's play area. Additionally, many trees have been planted along with a grass lawn and irrigation system (Fig 4D). For its construction, soil was poured onto the sandy beach area to plant the imported trees and grass, with added fertilizer. Approximately, a 1m wall was built behind the soil area to contain all the soil placed (Fig 4E). The distance of the soil area to the shoreline varies between 40 to 50 meters, which falls within the boundary of the 1<sup>st</sup> Protected Zone (<65m) and has reduced the natural available space of the protected nesting beach (Fig 4F). A low wooden border is installed between sand and soil area to prevent mixing of the imported altered habitat with the natural nesting sand area (Fig 4G). Furthermore, water from the showers flows directly onto the sandy beach area.

For all of the aforementioned installations, MERÇED and the public were not informed during the initiation or realisation of the project, nor their participation included, which is a legal requirement within the EIA process. The project was carried out and completed solely with the decision of the administration, in violation of the law and the circular numbered Circular # B.18.0.DMP.0.01.03 (2009/10).

Also of great concern is the lack of monitoring and protection applied to the sea turtle nests, especially in the region of the narrowed beach area. There is evidence of sea turtle nests in the vicinity (hatchling tracks), but no measures of nest identification or protection were observed (Fig 5). The monitoring and conservation of these nests is the responsibility of Anamur Municipality and we stress the need for an on-the-spot appraisal by the Bern Convention to ascertain the current level of protection and monitoring and advise accordingly. Additional information can be seen in the given links:

[R1]<u>https://www.facebook.com/watch/?v=667234147715292</u> (Facebook account of the Mayor Hidayet KILIÇ (date 10 May 2022)

[R2] <u>https://m.facebook.com/watch/?v=1199246020879526& rdr (</u>Facebook account of the Anamur Olay)

#### **D. SAND EXTRACTION:**

As reported in all of our previous reports and despite being prohibited by National legislation, sand extraction from Anamur nesting beach is still a regular occurrence, with authorities aware of the violations and no action taken. Previously the Municipality removed sand from the nesting beach, stating its use for the rehabilitation of the creeks. We again observed evidence of this illegal activity on the nesting beach at the region of Dragon Creek on 16<sup>th</sup> May 2022 (Fig 6). Although it was not observed who was responsible for the extraction, this activity had recently occurred during the beginning of the sensitive nesting season.

### E. IILLEGAL VEHICLE ACCESS TO BEACH

No progress has been made for the installation of preventative measures to stop the illegal entry of any vehicle to the nesting beach area from May to September. Along Anamur's 13 kilometer coastline, many entry points exist, with no attempts to block these entrances or apply enforcement of the National legislation (Fig 7A & B). Indeed, visitors and even authority members share photos/ videos of themselves illegally driving on the nesting beach on social media (Fig 7C), without any repercussions. Without proper enforcement and effective management measures, this illegal activity continues to pose a great risk to nesting females. (Fig 7D) Video references:

[R3] https://www.tiktok.com/@nehirnakliyat/video/7090072975763934465

[R4] https://www.tiktok.com/@nehirnakliyat/video/7090062348303617281

## F. LIGHT AND SOUND POLLUTION:

No action or mitigation measures have been implemented for the continued light pollution and loud sound incidences along the nesting beach. Private businesses, accommodation and also public parks (managed by Anamur Municipality) continue to operate with bright lights, in addition to organised parties and wedding ceremonies using fireworks and playing high volume music during the night. These disturbances not only reduce the likelihood that a female will successfully nest, but adds additional risks of hatchling disorientation and lowering their survival rate. Evidence of the light pollution effect for hatchling disorientation is provided in this video link, with hatchlings recorded walking through the streets in the likele region. https://fb.watch/eN111spJJ2/

The current photo of the lights of the newly built park within the scope of the Coastal Development Project can be seen in Fig 8.

#### G. ILLEGAL BUSINESS EXPANSIONS:

Local businesses continue to expand their area of operations unhindered (Fig 9) , across the entire region marked in Figure 1, with local authorities failing to impose fines for companies in violation of circular # B.18.0.DMP.0.01.03.

Since our last report one such business, the "Karaagac Beach company" expanded their business on the nesting beach area by constructing wooden bungalows, (Fig 10) 40m from the sea line within the 1<sup>st</sup> Protected Zone (<65m) and placed sunbeds, tables (Fig 10F), and lounges 17m from the sea. Currently, there are two bungalows built, but we have learnt that the company plans to build ten in total. Further alterations of the natural landscape have occurred with palm trees and vegetation planted and a water irrigation pipeline installed on the beach.

#### H. ZONING PLAN CHANGE:

As stated in the previous report, there was a zoning change plan covering some of the nesting beach area (by the decision of the Mersin Metropolitan Municipality, Zoning and Urban Planning Directorate, dated 9.2.2021

and numbered 76). The area is in Anamur Güzelyurt Neighborhood, block 1128, parcel no. 1, and MERÇED members and many citizens had objected to this plan.

Since the submission of the last report, the objection to the municipality's zoning change request regarding a part of the nesting beach was partially accepted by the Mersin Metropolitan Municipality Zoning Department. However, this only restricts the allowance of permanent structures on the beach; all other classifications are allowed.

## I. GEOTHERMAL DRILLING LICENSE

In accordance with the license given to a company by Mersin Governorship to establish a Geothermal Power Plant in Anamur Bozdogan Village, the announcement that the EIA process was initiated for the Field with License No. 2020/02 (License number: ER:3399412). This area is located within a 1st-degree natural protected area and is very close to the 1st-degree archaeological site.

In the licensed area, three drilling locations are planned. Drilling areas two and three are located far from the coastline, however, drilling area one is located within the nesting beach area and is very close to the 1st-degree archaeological site area.

MERÇED carried out an awareness campaign with the local community about the license, upon which they filed their objection to the Provincial Directorate of Environment and Urbanization. It was unofficially learnt in early May 2022, that the EIA process was terminated due to objections and the company submitted this termination decision to the court. To date, MERÇED has not been able to see an official document that the process is terminated.

### J. STONE WALL BUILT ALONGSIDE THE DRAGON RIVER:

The stone wall which was being built along the banks of the Dragon river, which was noted in our previous report has now been completed (Fig 11). Previously this natural landscape provided important habitat to the Soft Shell Nile Turtles (*Trionyx triunguis*) and wild bird species and is now lost.

## **3. ADDITIONAL INFO**

- The authorities responsible for protecting the nesting beach and sea turtles do not use their authority against the Municipality and law violating citizens/businesses. Anamur Chief Public Prosecutor's Office made a decision of non-prosecution regarding the criminal complaint we made against the responsible people and especially the Mayor of Anamur for the habitat destruction on Karaagac beach. (Decision date: 14 October 2021) MERÇED objected to this decision. In addition, MERÇED appealed to the Council of State against the decision regarding the decision of the Ministry of Internal Affairs not to grant permission to investigate the Mayor of Anamur, which we learned with the decision of non-prosecution. Our appeals have not been finalized yet.
- When Karaagac Picnic Area construction started in the Karaagac Region, The Ministry of Agriculture and Forestry fined Anamur Municipality 180.489 Turkish Lira for this illegal work. The Municipality had filed a counterclaim not to pay this fine. It is learned that the Municipality lost this lawsuit.
- As detailed in the report submitted to the 2020 autumn Bureau Meeting, a MERÇED volunteer has been working on identifying, marking, and recording the nests for 15 years. Last year, their car was set on fire by unknown persons. Sadly, as a result our volunteer left after this event. Currently, there is only one official person, who is responsible for the whole 13 km long nesting beach, which is insufficient to mark, protect or record the nests. A significant decrease was observed in the number of cages protecting the nests and due to the lack of information it is unknown if this is due to lower nests numbers or lack of monitoring personnel, as seen in Figure 5.



ANNEX I MAPS & PHOTOGRAPHS

Fig 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 -  $\odot$  MERÇED 14 February 2022



Fig. 2) Construction of Coastal Development Project altering and narrowing nesting beach © MERÇED - October-December 2021



**Fig. 3**) Most of the soil removed from Anamur nesting beach spring 2021, however, some soil, stones, water pipeline, debris still remains, and no further information has been made available for an update on the site's rehabilitation monitoring. © MERÇED - 31.07.2022 - Karaagac Picnic Area





**Fig. 4**) Coastal Development Project 1<sup>st</sup> Phase: A & B) Pergolas, introduced lawn and trees - © MERÇED - May 2022 Taşlık; C) Shower water flows directly onto the beach; D). New Plants, Soil, Excessive water - © MERÇED - May 2022 - Taşlık Region; E) Stone wall built behind the park. The height depicts the amount of soil poured to area. - © MERÇED - May 2022 - Taşlık Region; E). Region Narrowing of nesting beach - © Facebook - Mayor Hidayet KILIÇ's account - May 2022 - Taşlık Region; G) Wood plank separator & the Municipality rented some areas of the park to new beach operators (red circle).



Fig. 5) Caretta caretta hatchling tracks in the sand, but no markings or protection applied to the nest. © MERÇED - August 2022



Fig. 6) Evidence of sand extraction on the Nesting Beach observed during the sensitive nesting season - © MERÇED - 16 May 2022 - Dragon Region (East of Oba)



**Fig. 7**) Illegal Access to the Nesting beach. A & B) Vehicles are able to access to nesting beach at many different areas - © MERÇED - June 2022 - <u>Karaagac Region</u>; C) Social media posts of visitors illegally accessing the nesting beach - © TikTok - <u>nehirnakliyat</u> <u>account</u> - April 2022 - <u>Karaagac Region</u> D). Sea turtle tracks over laid by illegal vehicles tracks on the nesting beach. © MERÇED - May 2022 - <u>Mamure Castle region</u>





Fig. 8) Beach Arrangement Project Phase I - Lights - © Facebook - Anamur Olay account - May 2022



Fig. 9) Continued expansion of businesses on the nesting beach - © MERÇED - August 2022 - İskele Region



Fig. 10) Invading Businesses. All the bungalow houses (together with new provisions) sunbeds, tables, and lounges, wooden walkway, trees, plants, irrigation systems this year - © MERÇED - June 2022 - Karaagac Beach Company



Fig. 11) Stone Wall Built Along Side the Dragon River -  $\ensuremath{\mathbb{O}}$  MERCED - August 2022

## 25 February 2022

Report 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 2022 the Contracting Parties to the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)

MERÇED and MEDASSET hereby submit an updated report to the Spring Bureau Meeting of the Bern Convention (April 2022) on the conservation status of loggerhead sea turtle (*Caretta caretta*) nesting beaches and habitats of the Nile soft-shell turtle (*Trionyx triunguis*) in Anamur, Turkey.

### Contents:

- SUMMARY
- UPDATE FOR PREVIOUSLY REPORTED ISSUES
- NEW EMERGING THREAT: GEOTHERMAL DRILLING LICENSE
- REFERENCES
- ANNEX: MAP & PHOTOGRAPHS

### **1. SUMMARY**

Following our previous report (T-PVS/Files 2021 27), there has been no positive progress on the status of the two coastal development projects (Karaağaç Picnic Area and Coastal Arrangement) at Anamur or the transparency of information between the authorities and NGO. Full rehabilitation of the illegal picnic area at the "Karaağaç" beach section has yet to be completed and no communications provided on the monitoring plan of the site. Construction of the 95,000m<sub>2</sub> Coastal Arrangement Project started on September 2021 and have continued over the winter completely altering the natural habitat of nesting beach to a greater extent than at Karaağaç Picnic Area. The NGO did receive communication with the authority (Mersin Provincial Directorate of Nature Conservation and National Parks) that information was to be shared, but to date this has not occurred. Furthermore, no communication occurred with local authorities.

Additional violations continue to be recorded along the protected nesting beach such as, sand extraction, illegal vehicle entry, beach business expansion with the use of heavy machinery. There is a continued lack of law enforcement, inspections and sanctions to all these illegal activities. New emerging threats not previously reported include the construction of a stone wall along the bank of the dragon Rivulet, changing in the zone plans and the licensing of Geothermal drilling along the protected coastline.

## MERÇED and MEDASSET call upon the authorities to:

- Enforce the complete restoration of the Karaağaç section to its natural state
- Stop the construction of the "Coastal Arrangement Project" to be audited by independent scientists to assess the extent of the terrible destruction of nature.
- Ensure all local businesses and the local authorities comply with Turkish National law (Circular # B.18.0.DMP.0.01.03) and the Bern Convention's Recommendation No. 66 (1998).
- Collaborate and communicate with the local NGOs for all development and construction projects.
- Prevent further unsustainable development along the nesting beach of Anamur to prevent irreversible damage on the habitat and severe impacts to the nesting activity.
- Install barriers at all possible vehicle access locations to prevent illegal vehicle entry to the beach during the nesting season.
- Implement mitigation measures to eliminate light pollution on the nesting beach.

#### MERCED and MEDASSET call upon the Bern Convention Standing Committee to:

- Encourage authorities to urgently implement the necessary actions listed above.
- Conduct an urgent on-the-spot assessment in spring 2022 to evaluate all the issues and pressures along Anamur nesting beach (Annex Fig 1).
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### 2. UPDATE ABOUT PREVIOUSLY REPORTED ISSUES

#### a) Collaboration:

There has been no effective communication or collaboration between Anamur Municipality, the local authority, with the local NGOs for the transparency of the on-going developments along Anamur coastline. A representative of the Mersin Provincial Directorate of Nature Conservation and National Parks contacted MERÇED by phone, stating that they would '*come to Anamur and share information about the Coastal Arrangement Project*', six weeks prior to the finalisation of this report; however, to date no further communications have been attempted.

#### b) Rehabilitation of Karaagaç Picnic Area:

No further progress for the complete rehabilitation of Karaağaç Picnic Area has been observed. Despite most of the illegally dumped soil being removed during Spring 2021, no additional works have been carried out since and some soil remains along with debris of the installed water pipelines and rubble (Annex Fig.2). To date no information for the monitoring of the site's rehabilitation has been shared with the NGO's.

#### c) Sand extraction:

As reported in all of our previous reports to the Bureau, and in spite of Rec # 24 (1991) and National legislation, sand extraction with the use of heavy machinery from the nesting beach continues to occur unopposed by the local Municipality (Annex Fig 3). It has been declared to the NGO that this occurs for the rehabilitation of the creeks, however sand is extracted directly from the nesting beach and taken away. Although MERÇED members repeatedly filed out complaint form about this situation to the Presidential Communication Center (CIMER), the Municipality deceived the public by stating that this was done for the purpose of "rehabilitation".

Additional information and photos can be seen at: https://www.facebook.com/949710881892145/posts/1892578190938738/?d=n

#### d) Illegal vehicle access to beach

No progress has occurred to install barriers to prevent illegal vehicle entry to the nesting beach area. Only a few barriers are located at the entrance of the Karaağaç nesting beach. However, many entry points still remain open along the entire 13 kilometres of Anamur nesting beach. Vehicle tracks are very often seen on the beach especially at the weekends (Annex Fig 4.)

#### e) Light pollution:

No actions have been taken to reduce or eliminate the sources of light pollution. Businesses, private properties and recreational parks operated by the local Municipality continue to produce light pollution which will continue to cause risks during the nesting season.

## f) Expanding businesses on the nesting beach:

There has been no progress for the tourism businesses which expand their operations each year unhindered, occupying more space on the nesting beach (Annex Fig.5). No fines have been imposed by the authorities that violate circular # B.18.0.DMP.0.01.03.

## g) Coastal Arrangement Project

As stated in our previous report (T-PVS/Files 2021 27), construction of the Coastal Arrangement Project started in September 2021, covering and area of **95,000m**<sub>2</sub>. It will be completed in two phases, with the first phase continuing until 1<sub>st</sub> May 2022, spanning approximately **32.000 m**<sub>2</sub> and covers almost 0.75 km along the coastline. Works completed thus far include, soil poured directly onto the sand of beach area, young trees planted in the soil and a one-meter stone wall built in the soil area to support soil and trees. The height of the wall depicts the amount of soil poured on the sandy nesting beach. The distance of the soil area is almost 10-30 m from the shoreline in some locations. Further works also include the construction of an asphalt road directly behind the wall, (Annex Fig. 6)

Additional information and photo can be seen in:

https://www.facebook.com/949710881892145/posts/1934062566790300

The Mayor's Facebook account includes updates about the project:

https://m.facebook.com/hidayetkilinctr/posts/pcb.290019039801626/?photo\_id=290009159802614

https://m.facebook.com/story.php?story\_fbid=315984177205112&id=100063805956347

https://m.facebook.com/story.php?story\_fbid=298134282323435&id=100063805956347

https://m.facebook.com/hidayetkilinctr/posts/pcb.349960517140811/

https://m.facebook.com/story.php?story\_fbid=298134282323435&id=100063805956347&m\_entstream\_sou\_rce=timeline

https://m.facebook.com/story.php?story\_fbid=286538956816301&id=100063805956347&m\_entstream\_source=timeline

https://m.facebook.com/story.php?story\_fbid=1049236299200175&id=421944445262700&m\_entstream\_so urce=timeline

## h) Zoning plan change:

As stated in our previous report, there was a zoning change plan covering some of the nesting beach area (by the decision of the Mersin Metropolitan Municipality, Zoning and Urban Planning Directorate, dated 9.2.22021 and decision number 76). The area is in Anamur Güzelyurt Neighbourhood, block 1128, and parcel no. 1. In the original plan, a portion of the area (approximately 60-70 m distance from the shoreline) was planned as "Commerce-Tourism and Residential Area" (red area in yellow circle shown in Annex Fig. 7a).

MERÇED and many citizens had objected to this plan. The Metropolitan Municipality updated the plan considering the objections, so that a part of the area originally planned as "Commerce-Tourism and Residential Area" close to the shoreline was re allocated as a "Daily Facility Area" (Yellow area marked as "G" in yellow circle – Annex Fig. 7b) in the updated plan. The 'G' defines the use as a "Daily Facility Area", which allows the following; "non-permanent buildings and facilities made of portable materials including, showers, canopy, locker cabins, toilets, cafe-bar, patisserie, restaurant, tea garden, outdoor sports fields, sports facilities, golf fields, open show and entertainment areas, luna park, fair, water game park, facilities for exhibition and sales of handicraft products. It does not include camping and accommodation units. Building and facilities need to be made of non-permanent, portable materials".

While the designation of the zone as a "Daily Facility Area" is much better than "Commerce-Tourism and Residential Area", it highlights the continuation of development along the back of the nesting beach, which in turn will add further pressures along this nesting beach.

## i) Stone wall built alongside the dragon rivulet:

Since the positive removal of the illegal huts and shelters along the banks of the Dragon rivulet, the construction of a stone wall has begun along the banks (Annex Fig. 8). The construction of this wall destroys the natural riverbank habitat, which is crucial habitat for the threatened Soft Shell Nile Turtles (*Trionyx triunguis*). The plans for restoration along the creek have not been shared with the local NGO.

## 3. NEW THREAT: GEOTHERMAL DRILLING LICENSE

In accordance with the license given to a company (Öz Şimşek) by Mersin Governorship to establish a Geothermal Power Plant in Anamur Bozdoğan Village, the announcement that the EIA process has been initiated for the Field with License No. 2020/02 (ER:3399412). [R2] The license area (as marked with the blue rectangle in Annex-Fig. 9) incorporates a 1st-degree natural protected area and is very close to the 1st-degree archaeological site and three drilling areas and points are planned. Drilling areas 2 and 3 are far from the coastline. However, drilling area 1, comprises of 33.76 hectares and is between Dragon Rivulet and Mamure Castle, covering the nesting beach (Annex Fig.9) and is very close to the 1st-degree archaeological site area. If the power plant becomes operational, it will damage the nesting beach due to gas emission, water and sand pollution, and noise pollution (~113 dB).

To date this part of the nesting beach is located far from the town center of Anamur and the accommodations and businesses. Therefor it is less developed and typically hosts the highest density of *Caretta caretta* nests on Anamur nesting beach. According to Uçar's Ph.D. Thesis, [R3], the area between the Dragon Rivulet to Mamure Castle is marked as the only "high density" area in Anamur, in means of the number of nests. 441 *Caretta caretta* and 2 *Chelonia mydas* turtles were recorded in 2007 in this report. (See Annex-Fig. 10 for this information). More recently, 650 nests were observed in this area as reported by MERÇED volunteer's records for 2021. Additionally, the NGO would like to express their concern in regards to the future monitoring of Anamur nesting beach, as the MERÇED volunteer who has monitored the beach, marked and protected the nests for 15 years is no longer able to continue this task. At present there is only one government official responsible for the entire 13km beach and it is uncertain how this important role will be completed and the transparency of nesting information. Although Anamur Municipality has constantly informed the press that they are protecting the nesting beach, they neither assigned a person to maintain the beach nor apply protection. On the contrary, they attack the beach for profit.

Additional information and photo can be seen at:

https://www.facebook.com/permalink.php?story\_fbid=1928466547349902&id=949710881892145

#### 4. REFERENCES

**[R1]** Mersin Province, Anamur District 1st Stage (Center, Ören, Bozdoğan, Kaşdişlen Regions) 1/5000 Scale Additional and Revision Zoning Plan - https://www.mersin.bel.tr/ilan/-26cgtj March 2021 (and latest revision January 2022)

**[R2]** Project Description File for Geothermal Resource Exploration Drilling Project - Mersin Province, Anamur District, Bozdoğan Mah., 2020/02 (ER:3399412) Exploration License Field - Öz Şimşek Geothermal Energy Systems Construction Agriculture Tourism Limited Company - February 2022

**[R3]** Aşkın Hasan UÇAR (2008) Investigation of Biological Properties of Sea Turtles *Caretta caretta* and *Chelonia mydas* and Soft Shell NileTurtle *Trionyx triunguis* 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

## ANNEX



Fig 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 - Copyright MERÇED 14 February 2022



Fig. 2) Some of the soil is removed from the Anamur nesting beach: Karaağaç Picnic Area, however rehabilitation is not completed yet - Copyright MERÇED 12 February 2022





**Fig. 3**) TOP. Lorries belonging to the Municipality observed transporting the sand from the nesting beach SIDE: Heavy machinery used to remove sand directly form the nesting beach area - Copyright MERÇED 14 December 2021



Fig. 4) No barriers have been installed to prevent vehicle entry - Copyright MERÇED February 2022 3/8



Fig. 5) Expanding Businesses remain opposed – Copyright MERÇED February 2022



**Fig. 6a, 6b, 6c** ) Coastal Arrangement Project: Photos published on the Anamur Municipality's social media account, to introduce the development of the Coastal Arrangement project. The works are completely destroying the natural habitat of this nesting beach - Copyright Anamur Municipality 2021. More photographs can be seen at facebook addresses given in the main report-Section 2g. 4/8



**Fig 6d**) Coastal Arrangement Project: Photo displaying a previous illegal expansion of a local business (Yalçınkayalar Tea Garden). The business installed metal barriers on the nesting beach for placement of tables for customers, which were removed after objections were made. The same area is depicted in Photos 6e - 6h below, and is the same location where construction for the Coastal Arrangement Project. There used to be some elevation of the dune area where trees exist. Copyright MERCED February 2021



**Fig 6e, 6f, 6g):** Coastal Arrangement Project: Photos of the same location as Fig. 6d (Yalçınkayalar Tea Garden). The natural elevation of the dune area has been altered by the distribution of sand and soil, and narrowed the nesting beach to a distance of about 15-20 meters from the sea. **Fig 6h**). Construction of a 1 meter high stone wall added behind the soil covered area during construction. Note: Trees shown in photo were pre-existing on the beach prior to the construction. Copyright MERCED 2022



**Fig 6i**) Coastal Arrangement Project: Soil placed in front of stone wall up to a distance approximately in the 1st protected zone. White sticks show the placement of fast growing seedlings (Israeli Rubber and Eucalyptus) planted-Copyright MERCED 2022



**Fig. 7).** Zoning Plan Change. a) LEFT: Plan proposed in March 2021. b) RIGHT: Updated Plan in February 2022. Yellow circle depicts the difference between 2 plan revisions. - Copyright Mersin Metropolitan Municipality [See R1 in main document References section]



**Fig. 8).** Top: Red line outlines the extent of the stone wall built at Dragon Rivulet Banks. Bottom: Construction works of the stone wall – Copyright MERÇED - December 2021-February 2022



**Fig. 9**) Top: Geothermal Sondage license area. Bottom: Polygon Area 1 encompassing the nesting beach - Copyright Öz Şİmşek Geothermal Energy Systems Construction Agriculture Tourism Limited Company - February 2022 [See R3 in main document References section]



ANAMUR YUVALAMA KUMSALINDAKİ DENİZ KAPLUMBAĞALARI [(Caretta caretta (Linnaeus, 1758) ve Chelonia mydas (Linnaeus, 1758)] ve YUMUŞAK KABUKLU NİL KAPLUMBAĞASI [Trionyx triunguis (Forskal, 1775)] POPULASYONLARININ BİYOLOJİK ÖZELLİKLERİNİN VE KUMSAL ÖZELLİKLERİNİN İNCELENMESİ

AŞKIN HASAN UÇAR

MERSİN ÜNİVERSİTESİ FEN BİLİMLERİ ENSTİTÜSÜ

BİYOLOJİ ANABİLİM DALI

DOKTORA TEZI

MERSIN ARALIK - 2008 **Fig. 10**) Top: Nest numbers of Anamur Beach including the Geothermal Polygon Area 1 -Copyright Aşkın Hasan UÇAR – December 2008. Bottom: Aşkın Hasan UÇAR's Ph.D. Thesis as the reference of the top figure.