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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

43rd meeting

Strasbourg, 27 November - 1 December 2023

Open case-file: 2019/05

Habitat destruction in Mersin Anamur Beach (Türkiye)

- REPORT BY THE COMPLAINANT -

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

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****10 August 2023**

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

for the Autumn Bureau Meeting of 2023 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 2023) 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. The survey was funded by MEDASSET through a grant from Aktionsgemeinschaft Artenschutz (AGA), www.aga-artenschutz.de.

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1. SUMMARY

There have been no improvements since our previous report submitted in August 2022 T-PVS/Files(2022)33 and the decision of the Standing Committee to open a case file on the management and conservation status of the nesting beaches in Anamur. There is no 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. The second phase started in September 2022 and construction continued even during the nesting season, as depicted in photographs taken during our July 2023 survey and presented in Annex 1. Violations of the National legislation to protect the sea turtles and nesting habitat continue to occur without any consequence for the perpetrators. 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. A new conservation status change circular has been issued, covering the most dense nest number area and further limiting protection of the beach.

Details are provided at Annex 1 – Detailed Report

MERÇED and MEDASSET call upon the authorities to:

- Complete the rehabilitation and remove soil, trees, and concrete infrastructure put on the nesting beach for the “Beach Arrangement Project” Phase 1 and 2 to be compatible with Coastal Law, Circular # B.18.0.DMP.0.01.03, and international agreements.
- Provide location information of the “Beach Arrangement Project” including the coordinates of the area, length of the beach occupied, and distance from the shoreline.
- Enforce the full restoration of the Karaagac section to its natural state.
- 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.
- 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).
- Stop illegally taking sand from the beach.
- Take permanent measures to prevent illegal vehicle access to the beach.
- Allocate more staff 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 unsustainable stone wall construction along the Dragon River that results in irreversible damage to the habitat and severely impacts on the nesting activity and habitat of the *Trionyx triunguis* turtles.
- 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.)
- 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.

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 verify the damage to the nesting beach and habitat and to collect the information needed in order to address the complaint.

ANNEX 1: DETAILED REPORT OF 2023 FOR ANAMUR SPA, TURKEY, MAPS & PHOTOGRAPHS

DETAILED REPORT

An onsite survey was conducted in Anamur SPA in July 2023 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. Fieldwork was carried out both during the day and at night. All of the deficiencies pointed out in the written reports of the complainants and defense parties 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.

1. Illegally filled site in Karaağaç

Even though the government reports that the artificial factors that were illegally created on the beach were removed and that the beach was rehabilitated (Files32e_2022_Turkey_Mersin Anamur Beach_Govt-report) we documented that the area has not been fully rehabilitated. Soil residues used especially in the parts behind the beach are clearly visible. Complete removal of this foreign soil and stones from the area will speed up the rehabilitation process as the area is trying to self-repair with dune movements.

The natural vegetation is only preserved on the side of the rehabilitated stream which remains in a natural state, as the other side was covered with stones. The stream's water height and width are unsuitable to allow the African Softshell Turtle to live under these conditions. This area is now not an important habitat for the African Softshell Turtle.

According to the satellite images and the observation in the field visit, full rehabilitation is needed to allow the dune area and the small stream behind to regain their natural structure over time.

The visuals of the area are presented in Figure 1.

2. Beach Development 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 Beach Development Project on 20th.Feb.2020: <http://m.anamur.bel.tr/icerik/185/1184/baskan-kilinc-sahil-projesi-baslenen.aspx>

- 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”. (Area between marks 1 to 4 in Map 2) The municipality is carrying out construction in incremental phases. The first phase of the project (Area between marks 1 to 2 in Map 2) was completed between September 2021 to May 2022. The second phase of the project (Area between marks 2 to 3 in Map 2) started in October 2022 and it was still being carried out in July 2023. It is expected that 3rd phase of the project (Area between marks 3 to 4 in Map 2) will be completed until March 2024, as there will be Municipality elections next year.
- The second part of the allocated area is in the Karaağaç region which covers 4.660 m² of “Dune Land”. The length of this area is about 250 m. (It is the part between points A and B in Map 2.) 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. MERÇED is monitoring the area for possible new projects.

Current Situation:

The second phase of the Beach Arrangement Project of the Municipality of Anamur was still actively carried out when our on-site survey was performed in July 2023. This situation violates the 2009/10 circular on sea turtle conservation. Violations against the circular are listed below:

- No construction activities can be carried out on the 1st and 2nd protection zone. Construction activities can be carried out in the daytime on the Buffer zone of the nesting beaches between 1 May and 30 September. Works were carried out during the July survey in clear violation of this rule.
- A section of the planned beach arrangement is within the 1st Protection Zone (0-65m). This is also a clear violation.
- The lights used in the areas where the Beach Arrangement Project has been completed are very intense, their colors are inconsistent, and they are visible from the beach. This creates severe light pollution that seriously affects the sea turtles.

In addition to the above violations, it is clear that the soil used especially for filling adversely affects the sand structure of the beach. In this area, grass and tree planting is intense. This artificial interaction and the irrigation and fertilization works seriously threaten the natural structure of the beach.

The recreational areas and facilities which are operational and the ones which are planned within the scope of the project increase the usage pressure on the beach. In the first protection zone, the intensity of use, the pollution, water flowing from showers, artificial lighting, use of umbrellas and sun loungers seriously affect sea turtles.

The visuals of the project are presented in Figure 2.

3. Sand extraction

No direct sand extraction was observed during our survey. However, it is clear that the sandy part of the beach and the dunes were damaged in the activities carried out within the scope of the beach arrangement project. Some of these interventions on the beach (such as sand piles) may adapt to the natural structure over time, but significant changes will occur in the beach structure as a result of the interventions of the creek mouths.

The dune interventions are presented in Figure 3.

4. Illegal vehicle access to beach

During the survey, illegal vehicle entries were detected in almost all areas. Visuals related to vehicle entrances are presented in Figure 4.

5. Light and Sound Pollution

During the survey, dramatic sound, and light pollution were detected, severely affecting sea turtles. The extent of sound and light pollution is extremely problematic and is caused by the beach arrangement project under construction, restaurants, and entertainment venues operating on the beach, fireworks, and street lighting. The lights of the facilities are kept on and loud music is played until very late at night. The illuminations of the parks and walking paths within the scope of the Beach Arrangement Project are on all night. The tones and intensities of the lights are quite high, and their positions are wrong. Lights project directly on the nesting beach. Also, it is observed that fireworks are used for parties and wedding ceremonies.

Visuals related to light pollution are presented in Figure 5.

6. Expanding businesses on the nesting beach:

There are many facilities (restaurant, beach club, cafe, bungalows etc.) on the beach. The beach furniture management of these facilities does not comply with any rules. They are within the nesting zone and are not removed at night.

Businesses on the beach are increasing their occupation every year. For example the Karaağaç Beach & Restaurant at Karaağaç region, provides restaurant services and accommodation in bungalows on the nesting beach. We documented that this facility created a plantation area with its own irrigation system overflowing to the beach.

Two years ago, there were no bungalows, no tulle lodge, and no newly planted trees in Karaağaç Beach & Restaurant. Last summer we observed 2 bungalows, 2 tulle lodges, and 100 newly planted trees (almond, walnut, palm, rubber tree, etc). (Photographs provided in last year's report T-PVS/Files(2022)33 - Figure 10). We observed 7 bungalows, 4 tulle lodges, and over 200 trees this summer. We believe that there are plans to expand the facility in the near future and that the number of bungalows and trees will soon increase unless measures are immediately taken.

There are two camping areas in the area where Mamure Castle is located. Although these areas are at a safe distance, it has been observed that they plant palm trees and construct tiny houses. We believe that these camp areas are also trying to expand. There are also indications of bonfires lit on the beach at night in the areas where such facilities exist. Facilities and their impact on the beach are presented in Figure 6.

7. Stone wall built alongside the Dragon Rivulet

The stone wall constructed along the Dragon Rivulet has created a serious habitat destruction, especially for the African (Nile) Softshell Turtle (*Trionyx triunguis*). Based on interviews with local amateur fishermen and our own observations, many Nile Softshell Turtles individuals were spotted here. The stone wall built along the Dragon Rivulet has completely destroyed their nesting habitat, as African Softshell Turtles mainly nest on sand banks near Rivulets. Immediate measures must be taken to rehabilitate the banks to their natural state.

Images of the stone wall and African Softshell Turtles are presented in Figure 7.

Video of 2 African Softshell Turtles is presented in a MERÇED Member's Facebook account: <https://bit.ly/45mHiN>

8. Monitoring study

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 counting 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 professional/academic support.

Nest number estimation based on site survey:

The densest area of the entire nesting beach is the area between Dragon (Anamur) Rivulet and Mamure Castle, called Sector 4, as it is every year. We estimated that there were about 400 marked nests and 250

unmarked nests in this region. It is estimated that there were approximately 250 unmarked nests in Sector 1, 2, and 3 and 50 unmarked nests in Sector 5, which are less dense than Sector 4. We estimate there were 950 nests in total (until July 9) in the area. Nesting emergencies continued during the period when we carried out the fieldwork. In fact, both loggerhead and green turtle nesting emergencies continue unusually in August throughout Türkiye. Therefore, we guess the number of nests will exceed 1500.

It is seen that there are many nests without cages on the beach with traces of mother and baby sea turtles. Photographs showing the inadequacy of monitoring are presented in Figure 8.

9. Zoning plan change

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

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

10. Geothermal Drilling License

MERÇED filed a lawsuit against the drilling license for the Geothermal Power Plant, which will permit drilling on the beach. The litigation process is going on. The expert to be appointed by the court is expected to inspect the area soon.

11. New Circular on Change of Conservation Status

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.

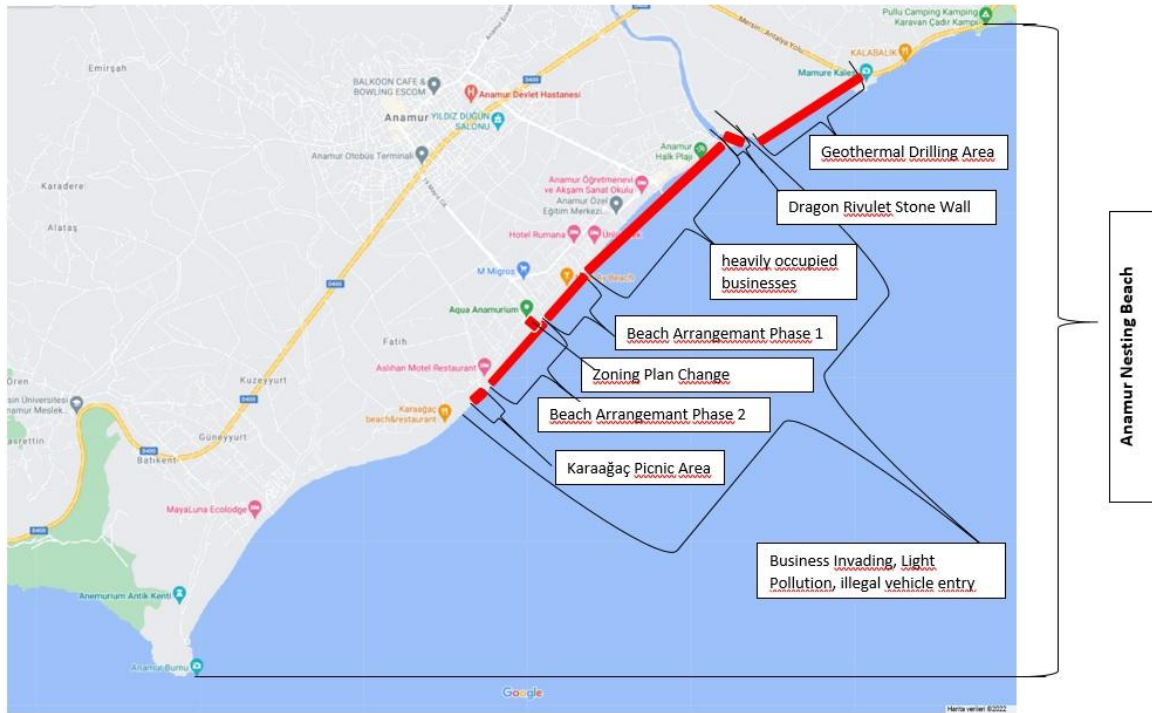
The conservation status of this region is reorganized by the Government Official Gazette dated 29 July 2023 and number 32263. (Ref1: <https://www.resmigazete.gov.tr/eskiler/2023/07/20230729-11.pdf>)

The new conservation status of the area is presented in **Map 3**. (Ref2: 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 3: Local Newspaper News Link :

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

MAP and PHOTOGRAPHS



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



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

Map 3) 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”)

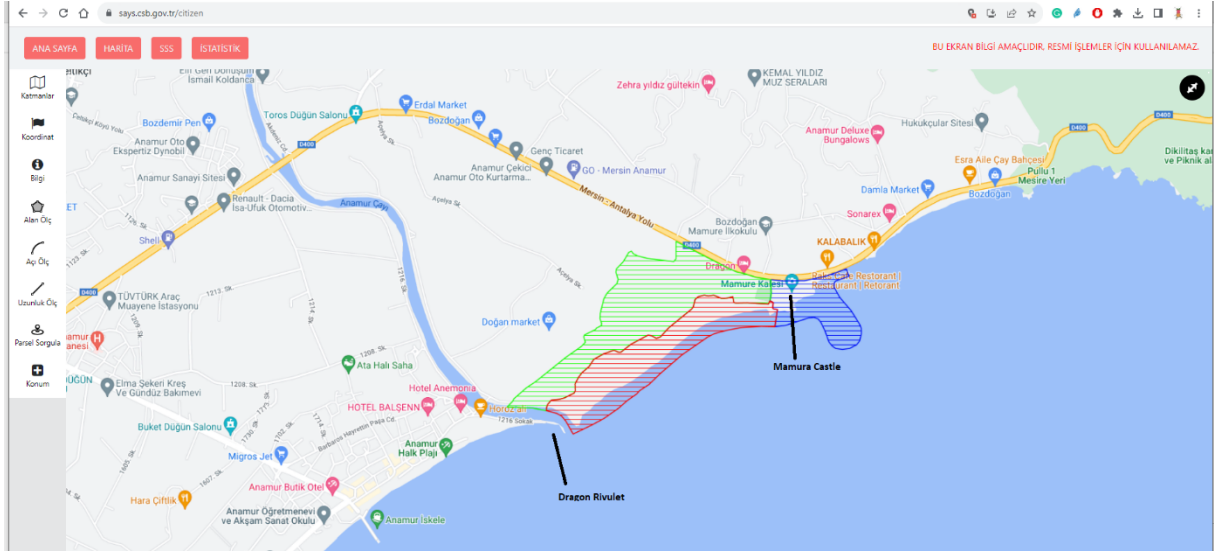
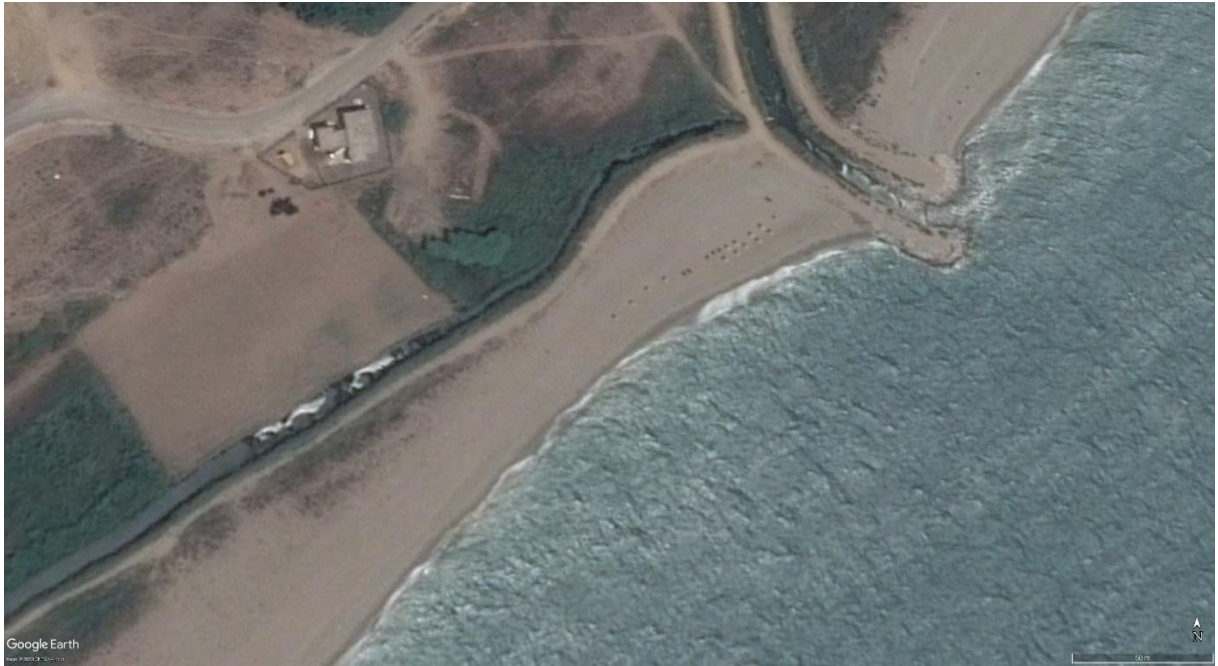


Figure 1 (a-f). Status of illegally filled area Karaağaç



a) Karaağaç in July 2017: The beach in its natural state



b) Karaağaç in August 2019: The situation with plantation and grass on the beach.



c) Karaağaç in July 2021: After the removal of artificial factors on the beach



d) Karaağaç rehabilitation zone in July 2023. The partially rehabilitated area is shown in the black triangle.



e) Soil residues in the rehabilitated area near the stream (yellow circle). Removal of this soil from the site will speed up the rehabilitation process.



f) The vegetation around the creek, in its natural state, preserves its natural structure.

Figure 2 (a-h) Beach Arrangement Project



a) Construction activities within the secondary protection zone continue - July 2023



b) Tracks of vehicles working in the beach arrangement project within the primary protection zone - July 2023



c) Soil brought to the field for filling and use of fertilizers for germination on backwards July 2023



d) No measures are taken to prevent the soil brought to the area for filling and its mixing with the dunes - July 2023



e) Project construction activities are still continuing despite the 2009/10 circular - July 2023



f) Beach Arrangement Project construction - Phase I - November 2021



g) Beach Arrangement Project construction - Phase II - February 2023



h) Beach Arrangement Project construction - Phase II - May 2023

Figure 3 (a-b). Sand extraction



(Fig. 3a) Sand was extracted to expand canal



(Fig. 3b) Sand extracted from canal (Fig. 3a) was relocated to these piles, during the activities carried out within the scope of the beach arrangement project.

Figure 4 (a-h). Illegal vehicle entrance



(Fig. 4a) Vehicle tracks on the beach



(Fig.4b) Vehicle tracks on the nesting area



(Fig. 4c) Vehicle tracks close to the nest



(Fig. 4d) Vehicle tracks on the dunes



(Fig.4e) Tracks on the beach nesting area



(Fig. 4f) Cars and tracks on the beach



(Fig.4g) Illegal vehicle entrances can be seen almost throughout the area.



(Fig.4h) Vehicles are parked on tide line.

Figure 5 (a-l). Light pollution



(Fig. 5a) A restaurant on the beach with high illumination



(Fig. 5b) Road lighting is in the appropriate tone but facing in the wrong direction



(Fig. 5c) Security lighting of public building



(Fig. 5d) Lighting of the summer houses



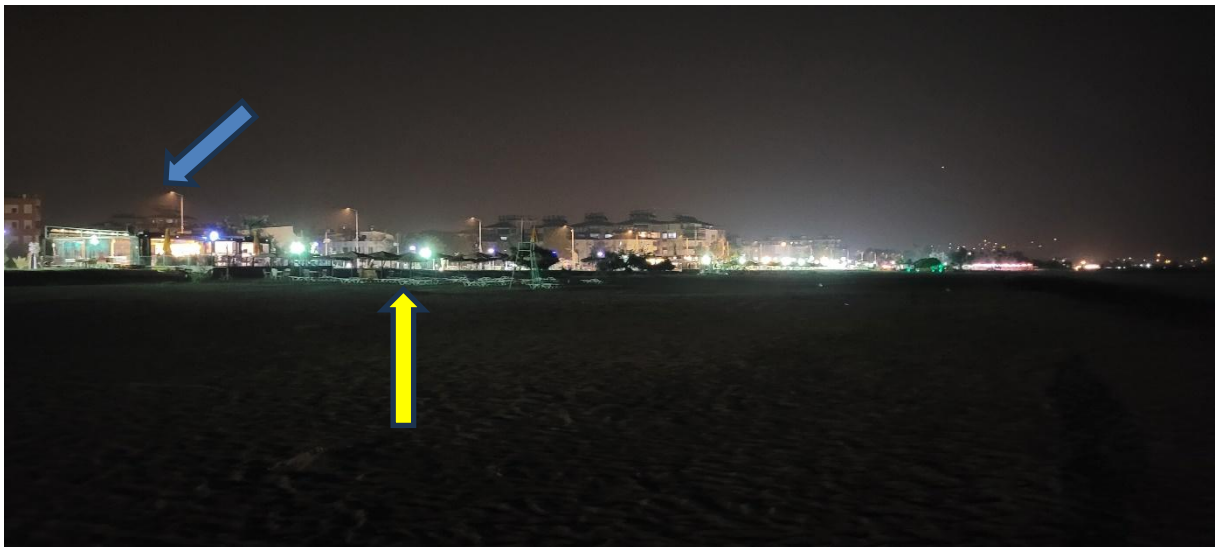
(Fig. 5e) An example of the lighting of the beach arrangement project



(Fig. 5f) Panoramic view of the lighting of the beach arrangement Project



(Fig. 5g) A road light in the middle of the beach



(Fig. 5h) Another example of the lighting of the Beach Arrangement Project. Beach furniture left on the beach (yellow arrow) and Properly oriented street lighting (blue arrow)



(Fig. 5i) Panoramic view of the lighting of the Beach Arrangement Project



(Fig. 5j) Walking road, park and restaurant lightings made within the scope of the Beach Arrangement Project. The distance between restaurant and sea is so close. Yellow arrow indicates the reflection of high tide line.



(Fig. 5k) Summer house lighting partially screened out by plantation plants



(Fig. 5l) Beach club lighting on Anamur Public Beach

Figure 6 (a-p). Expanding businesses on the nesting beach



(Fig. 6a) Plantation of palm trees in front of the camping area near Mamure Castle



(Fig. 6b) A tiny house constructed within the camping site near Mamure Castle



(Fig. 6c) Remnants of a fire on the beach



(Fig. 6d) Remnants of a fire on the beach



(Fig. 6e) Beach furniture covers the entire beach in some places.



(Fig. 6f) Discharges reaching the sea directly from the facilities on the beach



(Fig. 6g) The facilities on the beach have placed various signs and structures.



(Fig. 6h) The beach is totally invaded by the facility. The sign states “Caretta caretta nesting site. Please do not harm the nests.”



(Fig. 6i) Five beach facilities in a short distance.



(Fig. 6j) Beach visitors use the cage that protects the turtle's nest for different purposes.



(Fig. 6k) The facility located in the Karağaç region (yellow rectangle) and the plantation area with irrigation system (between the orange lines).



(Fig. 6l) Bungalows and palm trees (close-up of yellow rectangle in Fig. 6k)



(Fig. 6m) Irrigation system of the illegal plantation area (close-up of orange lines in Fig. 6k)



(Fig. 6n) Soil and fertilizer heaped up for gardening by Karaağaç Beach & Restaurant, which has planted hundreds of trees and many plants on the beach.



(Fig. 6o) Basement preparation is going on for additional bungalow houses to be built on the beach



(Fig. 6p) Trees, irrigation system, wooden covered walkway, beach furniture within 20 m from shoreline

Figure 7(a-i). Stone wall built alongside the Dragon RivuletRivulet and the African Softshell Turtle



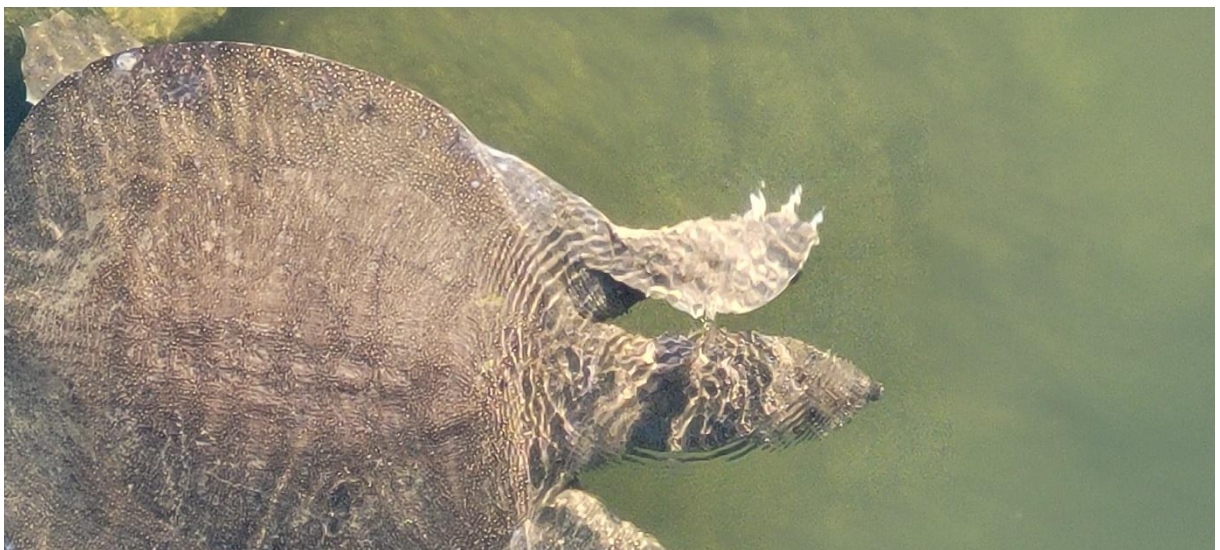
(Fig. 7a) Stone wall totally destroyed the African Softshell Turtle nesting habitat



(Fig. 7b) African Softshell Turtle in Dragon Rivulet



(Fig. 7c-d) Both sides of the Dragon Rivulet Rivulet covered by stone wall.



(Fig. 7e) African Softshell Turtle



(Fig. 7f) Natural habitat of African Softshell Turtle



(Fig. 7g) African Softshell Turtle tracks and nests on the beach (between Mamure Castle and Dragon Rivulet)



(Fig.7h) African Softshell Turtle swimming in Dragon Rivulet with car tire beside it



(Fig.7i) Young African Softshell Turtle swimming in front of the stone wall built into the Dragon Rivulet

Figure 8(a-b). Lack of Monitoring



(Fig.8a) Predators damaged nest since there is no cage installed on many nests - 6 July 2023



(Fig.8b) Many tracks are observed and there is no mark or cage around the nest. One assigned personnel is not sufficient to monitor 12+ km nesting beach - 31 July 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