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Subject: 2027 Marine Pollution Fines Tariff in Turkiye

Dear Sirs,

The pollution fines in Turkiye will be increased by 27.83 % based on the inflation adjustment announced by the Directorate of Revenue Administration on 03 November 2026.

In view of above, the pollution fines is expected to be applied from 01.01.2027 to 31.12.2027 as per following Tariff.

A)THE NEW POLLUTION FINES

I- Petrol and Petroleum products discharged to sea by tankers:

A	For vessels up to 1,000 (inclusive) gross ton	TL 7,353.22 per gross ton
B	For vessels between 1,000 and 5,000 gross ton	TL 1,838.36 to be added per gross ton over 1,000 gross ton to the item A
C	For the vessels over 5,000 gross tons	TL 183.75 to be added per gross ton over 5,000 gross ton to the item A+B

II- Dirty ballast discharged to sea by tankers:

A	For vessels up to 1,000 (inclusive) gross ton	TL 1,339.70 per gross ton
B	For vessels between 1,000 and 5,000 gross ton	TL 267.27 to be added per gross ton over 1,000 gross ton to the item A
C	For the vessels over 5,000 gross tons	TL 42.41 to be added per gross ton over 5,000 gross ton to the item A+B

III- Petrol/Petroleum products and dirty ballast discharged to sea by vessels or any other sea vehicles:

A	For vessels up to 1,000 (inclusive) gross ton	TL 3,676.60 per gross ton
B	For vessels between 1,000 and 5,000 gross ton	TL 735.34 to be added per gross ton over 1,000 gross ton to the item A
C	For the vessels over 5,000 gross tons	TL 183.75 to be added per gross ton over 5,000 gross ton to the item A+B

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IV- Garbage and sewage discharged to sea by vessels and any other sea vehicles:

For Cat 4, the previous version was mainly referring to the garbage and sewage discharge from the vessel and in the new provision of law the following are also described under the Cat 4 as pollutant:-

Domestic wastewater
Water with detergent
Foam
Scrubber system washing waters
Similar washing waters and solid wastes etc.

According to new provision, the fines for smaller vessels designated in the Environmental Law in case of a pollution incident occurs under the above mentioned Cat 4 is as below:

1	For vessels up to 18 (inclusive) gross ton	TL 40,775
2	For vessels between 18 and 50 gross ton	TL 81,558
3	For vessels between 50 and 100 gross ton	TL 163,117
4	For vessels between 100 and 150 gross ton	TL 244,680

For vessel's greater than 150 gross ton:-

A	For vessels up to 1,000 (inclusive) gross ton	TL 1,838.36 per gross ton
B	For vessels between 1,000 and 5,000 gross ton	TL 367.70 to be added per gross ton over 1,000 gross ton to the item A
C	For the vessels over 5,000 gross tons	TL 42.41 to be added per gross ton over 5,000 gross ton to the item A+B

Fines For Sulphur Content of Bunkers

According to new provision, the vessels using fuels with sulphur content beyond the limits allowed by the IMO regulations which is in force since 01.01.2020 and by Turkish law will be imposed a penalty and the tariff of fines to be applied is as below:

A	For vessels up to 1,000 (inclusive) gross ton	TL 1,631.21 per gross ton
B	For vessels between 1,000 and 5,000 gross ton	TL 203.88 to be added per gross ton over 1,000 gross ton to the item A
C	For the vessels over 5,000 gross tons	TL 40.79 to be added per gross ton over 5,000 gross ton to the item A+B

In November 2021, The Marmara Sea (including the Istanbul Strait, Canakkale Strait and Izmit Bay) was declared as a Special Environmental Protection Area with a Presidential Decision. According to new provisions, the fines for marine pollution originated from the vessels will be applied twofold if the incident occurs in the Special Environmental Protection Area.

As to the above Tariff, when applied to the Vessels/Sea vehicles are belonging any "Corporate" the calculated/established Fine amount will be increased / multiplied 3 (three) times more.

As per the relevant Law, in case of the repetition of the pollution offence by the same ship within 3 (three) years time;

-At the first repetition, the fine amount is increased by one time more,

-At the second and more repetition the fine is increased by two times more

If any dangerous substances or hazardous wastes are discharged into the sea, the fine will be 10 (ten) times the amount calculated using the category of petroleum and petroleum product fines as a basis.

KINDLY NOTE IF THE FINE IS PAID IMMEDIATELY (IN ANY CASE BEFORE THE VESSEL'S SAILING / WITHIN MAX. (30) DAYS) 25% REDUCTION WILL BE BENEFITTED.

B)Notifying of Pollution Incident by Port, Shore Facilities, Shipyards etc.

According to the new provision; a port, shore facility, shipyard, etc. fails to notify the authorities for a pollution incident occurred in their premises will be imposed an administrative penalty in amount of TL 203,897.99. In addition, if the facilities do not take necessary precautions to collect and manage the garbage, waste and wastewater an administrative penalty from TL 203,897.99 up to TL 815,605.83 will be applied to the facilities.

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Our recommendation:-

Following precautions recommended to be taken by the ship's crew for guidance purpose only and must not limit the precautions to be taken which may vary from vessel to vessel depending size, type, age, etc.

1) All Deck Scuppers to be plugged and secured.

2) Accommodation: All drain holes inside the accommodation including galley, pantry, all shower rooms and toilets' drain holes to be closed and also all Gate Valves to be closed. Fresh Water supply to be limited to Designated Shower Rooms with Drainage to Sewage Tank.

3) If directly connected to sea then all Public Toilet's Washing Basins sealed, with Chief Officer's signature on sealing tape.

4) All Laundry Rooms to be locked.

5) Crew meeting and instructions to be recorded.

6) All outlets to be checked periodically, to be sure that no discharge found, except cooling outlets for M/E generators etc.

7) All outboard valves in Engine Room and Cargo Holds to be shut & sealed, with Numerical Seals, which has to be broken when using those valves. Records for changing of seals to be made available.

8) Ship Sanitary Tank Discharge valve to be locked.

9) Sewage / sanitary system to be closed. Ship sewage tank discharge valve to be closed and locked.

10) All direct overboard outgoing lines to be closed and sealed.

11) No cleaning/washing to be made at weather deck.

12) No painting to be made on decks etc.

13) All garbage was secured.

14) Any other issue regarding dropping anything overboard to be checked and to be prevented as applicable.

15) Valid from 06 April 2021, it has been prohibited to discharge scrubber wash water from the vessels.

All above to be recorded in Deck Log Book.

Local agents recommendations (if any) regarding pollution prevention to be assessed and followed as applicable.

Above given without prejudice and for guidance purpose only.

The Vessels Agents are generally sending Circular/Notice/Warning to the Owners/Masters when they have been nominated as Agents transiting/waiting at anchorage/calling to Turkish Ports especially before the Vessels entering Canakkale Straits (Dardanelles) that the Masters would take steps not to cause any pollution incident.

The Masters of the Vessels would pay utmost attention and take all steps not to cause any pollution by leakage/spillage of any kind of materials (paintings, oil, bilges, any kind of ballast, all kind of residues, garbage, dirty waters, sewage waters, laundry waters with detergent, lavatory soap waters, shower waters, dust, rust etc.)

Submitted for your kind info.

Please contact us if you have any further queries and if you / your members need our assistance, we are always at your disposal.

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Best regards,

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