

## **Subject: Turkey’s Marine Pollution Fines Set to Soar in 2026**

Marine pollution from ships in Turkish waters continues to be a key enforcement priority for the Turkish authorities. Administrative fines for pollution from vessels are imposed under Article 20 of Environmental Law No. 2872 and are updated every year in line with the official inflation / revaluation rate published by the Ministry of Treasury and Finance.

On the date of 27.11.2025, the Tax Procedure Law General Communiqué No. 585 was published in the Official Gazette, fixing the revaluation rate for 2025 at 25.49%.

As in previous years, this rate is expected to be applied by the Ministry of Environment, Urbanisation and Climate Change when issuing its tariff of 2026 environmental administrative fines, including those applicable to marine pollution from ships.

A separate communiqué setting out the detailed 2026 tariff for Environmental Law No. 2872 (including the per-gross ton amounts for oil, dirty ballast, garbage and sewage and so on) is expected in due course. Until that is published, the exact figures are not yet official, but owners and Clubs should anticipate such an increase over the 2025 tariff as from 1 January 2026.

While the monetary levels will change, the enforcement framework for marine pollution in Turkey is expected to remain the same.

Given the expected increase in fines for 2026, we recommend that owners, operators and charterers trading to Turkey:

- ▶ update internal budgeting and risk assessments to reflect an increase in the monetary levels of pollution fines compared to 2025.
- ▶ ensure strict compliance with Turkish regulations regarding oily water separation, bilge handling, sludge disposal, garbage and sewage management.
- ▶ conduct additional crew training focused on operations in or near Turkish waters, including the Turkish authorities’ zero-tolerance approach.
- ▶ avoid tank cleaning, deballasting or bilge discharge operations when approaching or transiting Turkish territorial waters and straits.
- ▶ pay particular attention when at anchor or alongside Turkish ports, where inspections and aerial surveillance are frequent.

► In the event of a suspected pollution incident or notification from Turkish authorities:

- inform P&I Club and local correspondents **immediately**.
- preserve all evidence (Oil Record Books, log books, engine room and CCTV recordings, cargo and ballast records, sampling records).
- avoid signing any documents in Turkish without understanding their content; ask for translations where necessary.
- consider in advance whether to pay fines promptly with the 25% discount or to lodge security and challenge the fine in the Administrative Court. The decision should be taken in consultation with the Club and local correspondent on a case-by-case basis.

Once the Ministry of Environment publishes the detailed 2026 tariff for marine pollution fines, including the per-gross-ton figures for different categories of pollutants and vessel types, we will issue a follow-up circular summarising the exact amounts and providing worked examples.

For any queries, or for assistance in the event of a pollution allegation or fine in Turkey, please do not hesitate to contact us.

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