

NEW POLLUTION FINE TARIFFS FOR THE YEAR 2025 IN TURKISH WATERS

27.11.2024

Dear Sirs ,

We would like to inform you of the new pollution fine tariffs applicable as of 1st January 2025. The new fine rates has been published on 27 November 2024 in the Official Gazette and increased by 43,93%.

Pollution fines are divided in four categories: A, B, C and D.

Category A: Pollution from tankers discharging petroleum products and derivatives (raw petroleum, fuel oil, bilge, oil mud, refined product oil waste etc.)

Up to 1,000 (inclusive) GT	4.583,90 TL per unit GT
Between 1,000 and 5,000 (inclusive) GT	An additional 1.146,01 TL per unit GT
Over 5,000 GT	An additional 114,55 TL per unit GT

Category B: Pollution from dirty ballast discharged to sea by tankers

Up to 1,000 (inclusive) GT	835,15 TL per unit GT
Between 1,000 and 5,000 (inclusive) GT	An additional 166,61 TL per unit GT
Over 5,000 GT	An additional 26,44 TL per unit GT

Category C: Pollution from ships and other sea vehicles that release petroleum/ petroleum derivatives (bilge, oil mud, freight mud, fuel oil, oil waste or dirty ballast, etc.)

Up to 1,000 (inclusive) GT	2.291,94 TL per unit GT
Between 1,000 and 5,000 (inclusive) GT	An additional 458,40 TL per unit GT
Over 5,000 GT	An additional 114,55 TL per unit GT

Category D: Pollution from garbage and sewage discharged to sea by ships, tankers or other sea vessels

Vessels up to 1,000 (inclusive) GT	1.146,10 TL per GT unit
Vessels between 1,000 and 5,000 (inclusive) GT	An additional 229,21 TL per GT unit
Vessels over 5,000 GT	An additional 26,44 TL per GT unit

Fixed fine amounts for the vessels up to 150 GT

Vessels up to 18 (inclusive) GT	25.419,48 TL
Vessels between 18 and 50 GT	50.843,27 TL
Vessels between 50 and 100 GT	101.686,55 TL
Vessels between 100 and 150 GT	152.531,26 TL

Fines for Sulphur Content of Bunkers;

Authorities integrated Pollution fines for the vessels which is not comply with the IMO 2022 Sulphur Cap.

New fine tariff ;

Vessels up to 1,000 (inclusive) GT	1.016.219,20 TL per GT unit
Vessels between 1,000 and 5,000 (inclusive) GT	An additional 126.703,02 TL per GT unit
Vessels over 5,000 GT	An additional 24.564,53 TL per GT unit

An objection can be raised against the fine before the respective courts within 30 days as of the date of the service of the fine.

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.

Regarding to previous amendment which has been released on 2022, the pollution fine amount will be applied doubled if the pollution has occurred in the limits of the special protected area which includes the Marmara Sea and some several ports.

If it is decided to settle the fine, 25% discount will be applied if the fine is paid within 30 days as of the date of the service of the fine.

Recommendations

- De-ballasting operations should be avoided unless the ballast water was checked and confirmed to be clean.
- All overboard discharge valves should be closed and secured/sealed in closed position.
- All deck scuppers should be plugged and any gaps in the fish plate surrounding the deck should be closed.
- Hose test of hatch covers, hydrostatic test of deck pipes/hoses or other equipment should not be performed.
- Washing of decks and superstructure should be avoided.
- Treated water from the sewage system and grey water should be transferred to a holding tank and should not be discharged until the vessel is outside Turkish waters.
- Cargo residues, cargo space cleaning residues, all garbage and other substances should not be disposed in Turkish waters.
- The vessel's hull should not be scrapped, chipped or painted while alongside the pier or at anchor.
- While the vessel is at the shipyard or in dry dock, even if the pollution is caused by the negligence of the shipyard, its employees or agents, the ship may be held vicariously liable for the pollution fine. Therefore, the crew members should exercise care and they should immediately protest in writing to the shipyard where they believe pollution took place.

Please do not hesitate to contact us if you have any query about our above newsletter.

Yours sincerely,

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