

President Lily Venizelos

Vice President Prof. David Bellamy



c/o 4, Hillside Close, London NW8 0EF, UK Tel.: +44 (203) 2866189 E-mail: medasset@medasset.org www.medasset.org | www.euroturtle.org

U.K. Charity Reg. No. 1077649

H.E. Mr. İdris GüllüceMinister
Ministry of Environment and Urban Planning

H.E. Prof. Dr. Veysel EroğluMinister
Ministry of Water Affairs and Forestry

11 April 2014 Our Ref. 24395

SUBJECT: Sea turtle nesting beach conservation in Turkey

Dear Ministers,

I am writing to express my extreme concern about the conservation status of three sea turtle nesting beaches in Turkey. As you may be aware, MEDASSET has worked with Turkish authorities, researchers, universities and environmental organisations to improve sea turtle habitat conservation in Turkey since 1988.

I wish to draw your attention to three sea turtle habitats that are in urgent need of management in order to halt habitat destruction. In Patara SEPA, construction of numerous villas inside the protected area is threatening the archaeological site, the natural site and the *Caretta caretta* nesting beach. In Kazanli, the *Chelonia mydas* nesting beach continues to be threatened by erosion and by the 1.5 million tonnes of hazardous toxic waste next to the beach, which has not yet been neutralised and removed by the Kazanli soda-chromium factory. In Fethiye SEPA, the lack of management of tourism activities and developments on the protected *Caretta caretta* nesting beaches has resulted in severe decline of nesting levels and habitat damage. In addition, authorities are promoting the construction of a shipyard on one of the SEPA's nesting beaches (Akgöl /Karaot), although such a development is clearly inappropriate and incompatible with the protected status of the area.

As you may be aware, the conservation problems in Fethiye, Patara and Kazanli have been discussed repeatedly at the Bern Convention Standing Committee Meetings, to which Turkey is a signatory state. The 33rd Standing Committee of the Bern Convention in December 2013 decided to monitor these problems and offer assistance to Turkey to achieve improved protection of the sites, by opening a case-file for Fethiye and Patara SEPAs and by following-up in December 2014 on progress to resolve conservation problems in Kazanli.

Attached to this letter is a full list of our reports and correspondence, which describe in detail the identified problems and solutions for improved conservation in Kazanli, Patara SEPA and Fethiye SEPA. In summary, MEDASSET calls upon the Ministry of Environment & Urban Planning and the Ministry of Water Affairs & Forestry to:

For Fethiye SEPA

- Implement, **before May 2014** (the start of the sea turtle nesting season), a comprehensive action plan that will strengthen management and ensure adequate protection of the SEPA and especially of the nesting beaches. Consider the list of recommended actions in MEDASSET's reports.
- Produce a SEPA management plan for the land and marine areas that will include a clear description of permitted uses and activities.



- Allocate the necessary financial and human resources that will ensure enforcement of regulations and
 measures by authorities. With the support of the government, scientific teams attempt to protect nests
 from increasing disturbances and raise awareness among beach users each summer; these efforts cannot
 be fruitful in the absence of effective SPA management by local and national authorities that will deal
 with the uncontrolled expansion of economic activities and subsequent habitat destruction.
- Reject plans for the construction of a shipyard, drydock or marina, near or on the nesting beaches. Provide the official position of the Ministry on this matter.

For Patara SEPA

- Provide the official position regarding the villa construction project and address the concerns raised in MEDASSET's complaint regarding the associated impacts, lack of an EIA and carrying capacity study.
- Re-evaluate the scale of the villa construction project.
- Revise the SEPA management plan to sufficiently manage the increased number of visitors and implement, before May 2014, a comprehensive and updated action plan that will strengthen management and ensure adequate protection of the natural and archeological site.
- Allocate the necessary financial and human resources that will ensure enforcement of regulations and measures in the SEPA.

For Kazanli:

- Remove illegal beachside buildings and greenhouses from the nesting beach.
- Provide an update on action taken to deal with the beach erosion problem.
- Provide an update on the progress of the removal of the toxic waste from the nesting beach. At the Bern
 Convention Standing Committee Meeting in December 2013 the Delegate of Turkey provided the same
 information as that conveyed in the 2010 Meeting, that only 200,000 tonnes of toxic waste have been
 treated and that the final disposal site is still sought, which indicates that there has been no progress.

There are several examples of successful sea turtle habitat management in Turkey, however in these three sites there has been very little or no progress to date, with evident impacts on these priority habitats and species. Your leadership and commitment is needed as a matter of urgency to ensure that concrete action is taken to safeguard the well known ecological value of Fethiye, Patara and Kazanli.

MEDASSET remains at the disposal of your government to assist in the improvement of the conservation status of these important sea turtle nesting sites. We cannot stress enough the significance of protecting these habitats for the future viability of sea turtle populations in the Mediterranean.

Thank you for taking the time to address our concerns and recommendations. We look forward to receiving your prompt reply.

Yours sincerely,

Lily Venizelos

President

UNEP Global 5000 Laureate

Lily Verizelos

Member of IUCN-Species Survival Commission: Marine Turtle Specialist Group

Attachments: List of Recipients. List of reports and correspondence. Files 'PataraBinder.pdf' and 'FethiyeBinder.pdf'



LIST OF RECIPIENTS

TURKEY

Ministry of Environment and Urbanisation **DG** Environmental Impact Assessment **DG Protection of Natural Assets DG Environmental Management**

Marine and Coastal Management Department

Foreign Affairs Department Muğla Provincial Directorate Antalya Provincial Directorate Mersin Provincial Directorate

Project Office, Strengthening the System of MPAs

Ministry of Water Affairs and Forestry

DG Nature Conservation and National Parks

Monitoring and Evaluation Unit Survey and Inventory Division Wildlife Protection Department **Nature Conservation Department** Muğla Provincial Directorate Antalya Provincial Directorate Mersin Provincial Directorate Ministry of Culture and Tourism Antalya Provincial Directorate Muğla Provincial Directorate

Ministry of Transportation, Maritime Affairs and

Communications

DG Infrastructure Investment **DG Shipyards and Coastal Structures Grand National Assembly of Turkey**

Muğla Deputies **Antalya Deputies** Mersin Deputies Fethiye Governor Antalya Governor Mersin Governor **Fethiye Municipality**

Ova Municipality, Kaş District, Antalya

Union of Chambers of Turkish Engineers and Architects

Chamber of Architects - Antalya Branch

Chamber of Urban Planners

Association of Archaeologists - Istanbul Branch

Cağdas Hukukçular Derneği- Progressive Lawyers' Society Union of Turkish Bar Associations - Antalya Branch

Turkish Maritime Organization Fethiye Chamber of Shipping

Fethiye Chamber of Commerce and Industry

Turkish Hotels Federation Fethiye Hoteliers Union (FETOB)

Fethiye Tourism Education Culture and Environment

Foundation (FETAV)

Hitit Kooperatifi

Kumko Yapi Kooperatifi

MGS Consulting Engineering Projects LTD

Akdeniz Koruma Dernegi - Mediterranean Protection

Association

ÇEKÜL Foundation for Protection and Promotion of

Environment and Cultural Heritage

DEKAMER

Doğa Derneği - Nature Association

Doğa Araştırmaları Derneği - Nature Research Society

EKAD Ecological Research Society

EJOLT -Turkey

Greenpeace Akdeniz

Greensteps for Environmental Literacy Kaptan June Sea Turtle Foundation

Karaot Dayanisma group

KÜMİD Friends of Cultural Heritage

MEDCOAST Foundation Patara Bizimdir group **TEMA Foundation**

TTKD Türkiye Tabiatını Koruma Derneği - Turkish Association for the Conservation of Nature **TUDAV Turkish Marine Research Foundation**

TURMFPA

SAD Underwater Research Society

AFAG Mediterranean Seal Research Group

WWF Turkey

Scientific and Technical Research Council of Turkey

Abant Izzet Baysal University, Prof. Dr. Mehmet Tuncer

Adnan Menderes University

Doç. Dr Adem Ozdemir

Dr. Can Yilmaz

Prof. Dr. Kurtuluş Olgun Prof. Dr. Oguz Turkozan

Emin Bozkurt

Akdeniz University

Prof. Havva Iskan Isik

Prof. Dr. Sencer Sahin

Aksaray University, Yard. Doç. Dr. Özgür Güçlü Antalya University, Prof. Dr. Mehmet ÖZ Canakkale Onsekiz Mart University

Dr. Bektaş Sönmez



Yard. Doç. Dr. Sevil Yalçın

Assoc. Prof. Dr. Sukran Yalcin Ozdilek

Burcu AKDENİZ

Sea Turtle Research Center - DEKUM

Dokuz Eylul University

Doz. Dr. Cetin Ilgaz

Dr. Hakan Durmus

Ege University, Prof. Dr. Ertan Taskavak

Hacettepe University

Dr.Ali Fuat Canbolat

Dr.Onur Türkecan

Prof. Dr. Sedat Yerli

Istanbul University, Dr Serdal Ugurlu

Mersin University

Prof. Dr. Serap Ergene

Lec. Dr.Aşkın Hasan Uçar

Sea Turtle Research and Application Center

Ordu Üniversitesi, Yard. Doç. Dr Onur Candan

Pamukkale Univesity

Doç. Dr. Eyup Baskale

Prof. Dr. Yakup Kaska

Yusuf Katilmis

Muge Gidis

Suleyman Demirel University, Dr. Ibrahim Ozdemir

INTERNATIONAL

CITES Secretariat

Convention for the Conservation of Migratory Species

Convention on Biological Diversity Secretariat

Council of Europe, Bern Convention Secretariat

European Commission

Delegation of the European Commission in Turkey

DG Enlargement & European Neighbourhood Policy

DG Environment

European Environment Agency

European Parliament, EU-Turkey Joint Committee

UNDP Turkey

UNDP Resident Representative in Turkey

UNEP/MAP

Compliance Committee

MEDPOL

Regional Activity Centre for Specially Protected Areas

UNESCO

Permanent Delegation of Turkey

Turkish National Commission

World Heritage Centre

Europa Nostra

GEF - Global Environment Facility

IUCN Centre for Mediterranean Cooperation

Mediterranean Wetlands Observatory

MEDPAN - Network of marine protected area managers in

the Mediterranean

MIO-ECSDE

Mediterranean Wetlands Observatory

WWF MedPO



LIST OF REPORTS AND CORRESPONDENCE REGARDING KAZANLI, PATARA SEPA & FETHIYE SEPA

KAZANLI	
Reports by MEDASSET	Available at:
T-PVS (1999) 74	http://www.medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/223-t-pvs-99-74-specific-site-status-of-the-green-turtle-chelonia-mydas-on-the-turkish-mediterranean-coast?highlight=WyJncmVlbiJd
T-PVS (2000) 56	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1337959&SecMode=1&DocId=1463708&Usage=2
T-PVS (2001) 70	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1337959&SecMode=1&DocId=1463708&Usage=2
T-PVS/Files (2003) 14	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1326820&SecMode=1&DocId=1440834&Usage=2
T-PVS/Files (2004) 11	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1326883&SecMode=1&DocId=1438092&Usage=2
T-PVS/Files (2005) 10	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1326631&SecMode=1&DocId=1439854&Usage=2
T-PVS/Files (2006) 13	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1326529&SecMode=1&DocId=1436548&Usage=2
T-PVS/Files (2007) 16	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1326400&SecMode=1&DocId=1437176&Usage=2
No T-PVS reference (2008)	http://www.medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/187-published-without-a-t-pvs-reference-update-on-green-turtle-chelonia-mydas-conservation-monitoring-in-kazanli-turkey
No T-PVS reference (2009)	http://www.medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/189-published-without-a-t-pvs-reference-update-report-ongreen-turtle-chelonia-mydas-conservation-monitoring-in-kazanli-turkey-2009
T- PVS/Files(2013) 09	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1677304&SecMode=1&DocId=1644202&Usage=2
T-PVS/Files (2013) 52	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instrane tImage=2393674&SecMode=1&DocId=2079668&Usage=2
PATARA SEPA	
Reports by MEDASSET	Available at:
T-PVS (96) 53	http://www.medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/205-t-pvs-96-53a-conservation-of-loggerhead-turtles-caretta-caretta-and-construction-projects-on-the-beach-of-patara-turkey-follow-up-report-with-comments-on-the-status-report-on-patara-specially
T-PVS (97) 45	Available upon request
T-PVS (98) 49	http://www.medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/214-t-pvs-98-49-specific-site-marine-turtle-conservation-in-patara-turkey-status-report-and-evaluation-of-nature-protection-measures
T-PVS (99) 69	http://www.medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/219-t-pvs-99-69-specific-site-caretta-caretta-in-patara-turkey-status-report-and-review-of-nature-conservation-measures
T-PVS (2000) 57	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=1344001&SecMode=1&DocId=1459744&Usage=2
T-PVS (2001) 72	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instrane



	tlmage=1337917&SecMode=1&DocId=1463676&Usage=2
T-PVS/Files (2002) 14	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1325755&SecMode=1&DocId=1450668&Usage=2
T-PVS/Files (2003) 12	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1326796&SecMode=1&DocId=1440810&Usage=2
T-PVS/Files (2004) 13	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1326910&SecMode=1&DocId=1438128&Usage=2
T-PVS/Files (2005) 09	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=1326568&SecMode=1&DocId=1439832&Usage=2
No T-PVS reference (2007)	http://www.medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/188-published-without-a-t-pvs-reference-update-report-and-review-of-nature-conservation-measures-in-patara-spa-turkey
No T-PVS reference (2009)	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=1394371&SecMode=1&DocId=1485528&Usage=2
No T-PVS reference (2012) Complaint	http://medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/174-complaint-to-the-bern-convention-construction-of-summer-houses-within-patara-spa-turkey
T-PVS/Files (2013) 09	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&Instranet.Image=2316874&SecMode=1&DocId=1995206&Usage=2
T-PVS/Files (2014)16	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=2492131&SecMode=1&DocId=2121374&Usage=2

FETHIYE SEPA

FETHIYE SEPA	
Reports by MEDASSET	Available at:
No T-PVS reference (2008)	http://medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/184-published-without-a-t-pvs-reference-sea-turtle-nesting-beach-degradation-in-cirali-and-fethiye-turkey
No T-PVS reference (2009) Complaint	http://www.medasset.org/en/resource-centre/publications/technical-reports-position-papers-and-policy-recommendations/173-complaint-to-the-bern-convention-addressing-the-threats-facing-the-loggerhead-sea-turtle-caretta-caretta-nesting-beaches-in-fethiye-mugla-province-of-turkey
T-PVS (2010) 08 E	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=1677304&SecMode=1&DocId=1644202&Usage=2
No T-PVS reference (March 2011)	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=1788142&SecMode=1&DocId=1709842&Usage=2
No T-PVS reference (April 2011)	http://www.coe.int/t/dg4/cultureheritage/nature/bern/institutions/Documents/042011_MED ASSET_Report_en.pdf
No T-PVS reference (December 2011)	http://www.coe.int/t/dg4/cultureheritage/nature/Bern/Institutions/Documents/2012/MEDASS ET%20Update%20Report%20to%20Bern%20Convention-%20December%202011-%20%20FETHIYE%20SPA.pdf
T-PVS/Files (2012) 42	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=2169322&SecMode=1&DocId=1943474&Usage=2
T-PVS/Files (2013) 09	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=2316874&SecMode=1&DocId=1995206&Usage=2
T-PVS/Files (2014) 16	https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=2492131&SecMode=1&DocId=2121374&Usage=2



RECENT CORRESPONDENCE

FETHIYE SEPA

Letters are in the attached file 'FethiyeBinder.pdf'

From MEDASSET

2007, April 23rd. To: Dr. M. Kemal Yalinkilic, Doğa Koruma ve Milli Parklar Genel Mudurlugu

2009, December 5th. To: Dr. M. Kemal Yalinkilic, General Director of National Parks and Game-Wildlife

2010, February 26th. To: Mr. A. Ozyanik, President of Environmental Protection Agency for Special Areas

2010, September 17th. To: Mr. A. Ozyanik, President of Environmental Protection Agency for Special Areas

2010, September 29th. To: Mr. A. Ozyanik, President of Environmental Protection Agency for Special Areas

2011, April 5th. To: Prof. Dr. Veysel Eroglu, Minister of Environment and Forestry

2011, June 16th. To: Mr. A. Ozyanik, President of Environmental Protection Agency for Special Areas Replies to MEDASSET

2010, January 21st. From: Mr. A. Ozyanik, President of Environmental Protection Agency for Special Areas 2010, September 23rd. From: Mr. A. Ozyanik, President of Environmental Protection Agency for Special Areas

2011, June 27th. From: Mr. A. Ozyanik, President of Environmental Protection Agency for Special Areas Other:

2011, May 30th. From: Dr. Yakup Kaska, Pamukkale Univesity

2011, June 17th. From: IUCN Marine Turtle Specialist Group Co-Chairs. To: Minister of Environment & Forestry 2011, October 7th. From: Bern Convention Standing Committee Chair. To: Minister of Environment & Forestry

PATARA SEPA

Letters are in the attached file 'PataraBinder.pdf'

From MEDASSET

2011, May 3rd. To: Prof. Dr. Veysel Eroglu, Minister of Environment and Forestry

2012, October 12th. To: Prof. Dr. Veysel Eroglu, Minister of Environment and Forestry

Replies to MEDASSET

2011, December 29th. From: DG of Museums & Cultural Heritage, Ministry of Culture & Tourism.

Other:

25 May 2011, From: UNESCO World Heritage Center.