# KALIMBASSIERIS MARITIME A.S.

## TÜRKİYE POLLUTION FINES 2027

As stated in our previous annual Circulars regarding pollution fines, the fine amounts are updated each year based on the country's inflation adjustment rate. The Directorate of Revenue Administration under the Ministry of Treasury and Finance has announced the inflation adjustment rate in the Official Gazette dated 24 November 2026. The rate has been set at **27.83%,** meaning that fines in 2027 will increase by 27.83% compared to the fine levels applied in 2026. This increase becomes effective from 1st January 2027.

The revised 2027 rates are outlined in the table below.

**A- ARTICLE 20 (i) (1) Petroleum and petroleum products including but not limited to crude oil, liquid fuel, greasy waste, oily mud, slop, sludge by tankers**

| GROSS TONNAGE | Rates valid from 01.01.2027 |
|---|---|
| Up to 1000 (inclusive) GT | TRY per GT (Base) 7,353.21 |
| 1001-5000 (inclusive) GT | TRY per GT (Additional) 1,838.36 |
| 5001 and up | TRY per GT (Additional) 183.75 |

**B- ARTICLE 20 (i) (2) Dirty ballast discharged by tankers**

| GROSS TONNAGE | Rates valid from 01.01.2027 |
|---|---|
| Up to 1000 (inclusive) GT | TRY per GT (Base) 1,339.69 |
| 1001-5000 (inclusive) GT | TRY per GT (Additional) 267.26 |
| 5001 and up | TRY per GT (Additional) 42.41 |

**C- ARTICLE 20 (i) (3) Vessels / other sea vehicles releasing dirty ballast and petroleum products**

| GROSS TONNAGE | Rates valid from 01.01.2027 |
|---|---|
| Up to 1000 (inclusive) GT | TRY per GT (Base) 3,676.59 |
| 1001-5000 (inclusive) GT | TRY per GT (Additional) 735.34 |
| 5001 and up | TRY per GT (Additional) 183.75 |

**D- ARTICLE 20 (i) (4) Vessels and other sea vehicles discharging/releasing solid waste garbage/ domestic wastewater/ sewage/ detergent water/ foam/ scrubber water or similar wash water, etc.**

| GROSS TONNAGE | Rates valid from 01.01.2027 |
|---|---|
| Up to 18 (inclusive) GT | TRY 40,776.37 |
| 18-50 (inclusive) GT | TRY 81,559.65 |
| 50-100 (inclusive) GT | TRY 163,119.32 |
| 100-150 (inclusive) GT | TRY 244,681.29 |
| Up to 1000 (inclusive) GT | TRY (Base) 1,838.50 |
| 1001-5000 (inclusive) GT | TRY (Additional) 367.69 |

[1] In this circular, units denoting the next thousandth are denoted with a comma (",") and units denoting TRY cents are denoted by a full stop (".").

| | |
|---|---|
| 5001 and up | TRY (Additional) 42,41 |

* According to the provisions of the Environment Code (Article 23), the repetition of the same act by the same vessel within the next three years after the service date of the first fine will result in doubling the fine amount for the next pollution event and tripling for the following ones.

** If any hazardous waste or similar nature or of its substance is released / dumped to the sea, the fine to be imposed is 10 (ten) times of the announced tariffs under the category of "A" above.

*** If the vessel or the sea craft (offender) cleans the pollution caused by its own, by using her own means and efforts, the administrative fine shall be 1/3 of the total amount.

**** Payment of the fine within 30 days as of the service date provides an advantage of 25% discount over the total amount.

***** The above rates are tripled if the owner of the vessel, which caused pollution is a legal entity. This would apply to all commercial vessels.

****** The above rates will be doubled for the pollution incurred at Special Environment Protection Zones. The special zone covers the Marmara Region and Straits which also cover the Marmara Region and Straits (contains all ports and anchorage areas within Istanbul, Kocaeli, Yalova, Bursa, Balikesir, Canakkale, Tekirdag).

******* Gross tonnage limitation has been introduced for additional amount per GT applicable for vessels exceeding 5,000 GT under article 20 (i) (4). Accordingly, the following table would be used and for tankers, ships and other marine vehicles which are larger than GRT 100,000, an administrative fine shall be imposed on the basis of those for GRT 100,000.

**Statements and Sampling Process**

When a pollution allegation arises, the vessel is detained by the Harbor Master, and the following procedure is initiated:

Coastguard personnel usually board the vessel to take crew statements, and if deemed necessary, will also collect samples from onboard the vessel. The Authorities may take samples from the polluted area (if possible) and from the open sea (clean area) during their inspection for comparison purposes. It is important to note that this procedure may vary depending on the specific case or region.

In cases where the source and type of the pollutant is unclear and a sample analysis is required, the administrative fine is issued after sample analysis is completed. However, if the source and type of the pollutant is evident or established by available evidence (i.e video recordings or photographs), the authorities can immediately proceed with issuance of the fine without waiting for any sample analysis to be completed.

When samples are collected by the Authorities, they are sent to The Scientific and Technological Research Council of Turkey (TÜBİTAK) for analysis.

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Once the analysis is complete and if presence of pollutant in samples is confirmed, the Authorities will then issue a fine.

**Payment and Objection Procedures**

For the purpose of releasing the vessel from detention while the procedures, as explained above, are completed, the Authorities will request security from the vessel's interests in the form of Club Letter of Undertaking or Bank Guarantee issued by a Turkish bank.

In most cases, a Letter of Undertaking (LoU) from the vessel's P&I Club is usually acceptable. However, the LoU wording requested by the Turkish Authorities for pollution cases differs from the standard wording of a Club LoU. It is essentially an agreement to accept payment within 30 days after the fine is issued and to date, Authorities have not shown any sign of flexibility to accept amendments to this wording.

Once the Authorities formally issue a fine for the alleged pollution incident, it must be paid immediately, within 30 days. As outlined above, if the fine is paid within 30 days, a 25% discount will be applied.

Objections to fines can be filed with the Administrative Court within 30 days of receiving the fine notice. It should be noted that payment of the fine does not prejudice the Owner's right to appeal the fine within the given timeframe.

In this regard, in the event of an allegation of marine pollution, prompt appointment of P&I local correspondent is essential to ensure the efficient management of procedures with the Authorities from the outset of the matter for best possible protection of the vessel's interests.

Should you have any queries relating to this update, please contact Kalimbassieris Maritime Istanbul Office by email: istanbul@kalimbassieris.com or Tel: (+90) 2164575600.

Yours Sincerely,
**Kalimbassieris Maritime A.S.**

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