EAGLE OCEAN MARINE CIRCULAR

NOVEMBER 5, 2026

TO ALL INSUREDS AND BROKERS

Dear Colleagues:

ENVIRONMENTAL POLLUTION FINES IN TURKIYE: 2027 UPDATES

A revised pollution fine tariff schedule has come into effect as of January 1, 2027 for Turkiye. In the event of sea pollution, fines may be levied by the Turkish Environmental Protection Agency (EPA) or by local Harbor Masters. For 2027, these fines will increase by 27.83% over those which applied in 2026.

Pollution fines levied by the EPA

The 2026 fine schedule has been separated into four categories as summarized below in Turkish Lira (TRY) and will be applicable from January 1, 2027 to December 31, 2027.

Tonnage	Fine
Category 1: Petrol/petroleum products discharged to sea by tankers	
Up to 1,000 GT	7,353.22 TRY/GT
1,001 to 5,000 GT	An additional 1,838.36 TRY/GT
More than 5,000 GT	An additional 183.75 TRY/GT
Category 2: Dirty ballast discharged to sea by tankers	
Up to 1,000 GT	1, 339.70 TRY/GT
1,001 to 5,000 GT	An additional 267.27 TRY/GT
More than 5,000 GT	An additional 42.41 TRY/GT
Category 3: Petrol/petroleum products and dirty ballast discharged to sea by vessels or any other sea vehicles	
Up to 1,000 GT	3,676.60 TRY/GT
1,001 to 5,000 GT	An additional 735.34 TRY/GT
More than 5,000 GT	An additional 183.75 TRY/GT
Category 4: Garbage and sewage discharged to sea by vessels and any other sea vehicles including domestic wastewater, water with detergent, foam, scrubber system wash water and similar washing waters and solid wastes, etc.	
Up to 18 GT	40,775.00 TRY
18 to 50 GT	81,558.00 TRY
50 to 100 GT	163,117.00 TRY
100 to 150 GT	244,680.00 TRY
150 to 1,000 GT	1,838.36 TRY/GT
1,001 to 5,000 GT	An additional 367.70 TRY/GT
More than 5,000 GT	An additional 42.41 TRY/GT

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Fines for sulfur discharges

Vessels using fuels with sulfur content beyond the limits allowed by IMO regulations that entered into force on January 1, 2020 will be subject to a fine as per the schedule below:

Up to 1,000 GT	1,631.21 TRY/GT
1,001 to 5,000 GT	An additional 208.88 TRY/GT
More than 5,000 GT	An additional 40.79 TRY/GT

The above fines will be doubled for the Marmara Sea including the Istanbul Strait, Canakkale Strait and Izmit Bay.

Fine adjustments

The fines, as noted above, will be adjusted considering the following:

- Repetition of the same act by a vessel within three (3) years of the date of the first fine will result in the doubling of the fine and tripling of the fine for any repetition of the act thereafter.
- The fine will be tripled if the owner of the vessel that caused the pollution is a legal entity that is registered in Turkiye.
- If hazardous waste or material of a similar nature is released or dumped in Turkish waters, the fine imposed will be 10 times the fine as set forth in Category 1 above.
- If the owner of an offending vessel cleans up the pollution itself, by using its own means and efforts, the administrative fine shall be levied at 1/3 of the total amount.
- Owners are entitled to lodge an appeal to any fines before an administrative court within 30 days of the fine's notification date. However, appealing the fine will not result in lifting of a fined vessel's arrest order and appeals have a low probability of success.
- An additional administrative fine will also be levied for vessels that are of 100,000 GT or more.
- If the fine is paid prior to the vessel sailing within 30 days, the fine will be reduced by 25%.

Important Notes

Any video footage or pictures taken by environmental officers, the coast guard or otherwise can only be released by court order. However, officers do release such records to P&I club representatives or agents unofficially upon occasion.

Insureds are entitled to lodge an appeal to any fines before an administrative court within 30 days of the fine's notification date. However, appealing the fine will not result in lifting of a fined vessel's arrest order and appeals have a low probability of success.

Thus, Eagle Ocean Marine Insureds are recommended to consider paying any fines within the appeal period in order to benefit from a 25% discount of the fine to enable to the vessel to sail without delay. If fines are not paid, the vessel can be sold at auction by relevant authorities to recuperate the pollution fines.

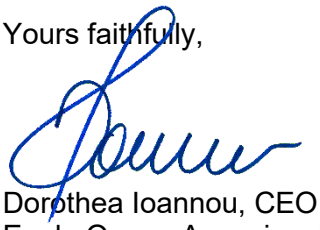
Recommendations to avoid fines

- Crew meetings, instructions and actions taken to ensure overboard discharges are prevented should be recorded in deck and engine log books, as applicable.
- De-ballasting operations should be avoided unless the ballast water has been checked and confirmed to be clean.
- All overboard discharge valves should be closed and secured/sealed in closed position. Outlets should be checked periodically to ensure there are no discharges except for cooling outlets for main engine generators.
- All deck scuppers should be plugged and any gaps in the fish plate surrounding the deck should be closed.
- Washing of decks and superstructure should be avoided, if possible.
- 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 and in accordance with applicable laws and conventions.
- Cargo residues, cargo space cleaning residues, all garbage and other substances should not be disposed of in Turkish waters.
- Outboard valves in engine rooms and cargo holds should be shut and sealed with numerical seals. If they are broken for use, records should be checked for the changing of seals.
- The vessel's hull should not be scraped, chipped or painted while alongside the pier or at anchor.
- All drain holes inside the accommodations including galley, pantry, all shower rooms and toilet drain holes, and gate valves should be closed. Fresh water supply should be limited to designated shower rooms with drainage to the sewage tank.
- Laundry rooms should be locked.
- While the vessel is at a Turkish shipyard or 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, vessel crew members should exercise care and should immediately issue a Letter of Protest (LoP) to the relevant shipyard.
- Insureds should familiarize themselves and comply with local regulations, which may be stricter than MARPOL regulations. P&I insurance cover for pollution fines responds only to the accidental escape of a pollutant from a vessel, and not in cases where a violation arises due to misinterpretation or operational breaches of local rules.

If Turkish authorities assert a violation by a vessel which might lead to pollution fine, Insureds are urged to contact the Managers and the local P&I correspondent immediately for assistance.

Eagle Ocean Marine recommends that Insureds take note of this information and be guided accordingly. Correspondent Vitsan Mumessillik ve Musalvirlik, A.S. in Istanbul is thanked for their assistance on this topic and for providing the information upon which this Circular has been based.

Yours faithfully,



Dorothea Ioannou, CEO
Eagle Ocean Agencies, Inc.

Eagle Ocean Marine is an American Club fixed premium facility offering gold standard International Group club service, underpinned by the impeccable security of reinsurance at Lloyd's.