



**KREUZER-ABTEILUNG**  
DES DEUTSCHEN SEGLER-VERBANDES E.V.

Kreuzer-Abteilung des DSV, Gründgensstr. 18, 22309 Hamburg

Mr Ertugrul Günay  
Minister  
T.C. Kültür ve Turizm Bakanlığı  
91 Sokak  
4 Cadde Emek  
ANKARA – TÜRKİE

Hamburg, 4 February 2010  
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Dear Sir,

**RE: Blue Card scheme and proposed restrictions in the Gulf of Göcek**

this letter includes our statement concerning the above mentioned topics. The latest proposals that have been announced regarding the Blue Card scheme in Mugla and mooring restrictions in Gocek/Dalaman bays have caused us considerable concern.

We fully appreciate and support the objectives behind the proposals, which we understand aim to protect and preserve your unique coastal heritage and environment. But on the other hand we have to speak in the interest of 20.000 members in the German Cruising Association.

This so called "Kreuzer-Abteilung" is part of the German Sailing Federation with 180.000 members, today one of the most important nautical associations worldwide and was established over 100 years ago to promote cruising in yachts. Many of our members love the Mediterranean waters and especially the Turkish coast, the hospitality of the Turkish people and the high quality service of the modern marinas.

Kreuzer-Abteilung publishes information and guidance to assist our membership (and others) to undertake passages and explore different countries. All members subscribe to a code of practice including protection of the environment, by safe disposal of rubbish, keeping down noise, etc.

While our members are required to obey local laws and customs, most normal production sailing yachts (including locally based chartered sailing yachts) will be unable to comply with the regulations as drafted.

In particular:

1. The majority of yachts do not have the facility to pump out through a deck fitting
2. Almost *no* yachts have the ability to collect and store grey water. Plumbing for sinks, wash basins and showers is normally to adjacent skin fittings and out to sea.
3. The capacity of black water holding tanks (60 litres is typical) is sufficient only for a few days before pumping out.



4. Grey water output is probably c. 15 litres per day per person. A grey water holding tank would need to be of equivalent size to the fresh water tank (say 300 litres), and few yachts would have the space or the displacement for this. If the black water tanks are used for this purpose, a yacht would need to pump out ashore every day.
5. Pump out points that are accessible and sufficient in number have not been identified. A pump out point may be able to service 20-30 boats in a day, but even this needs qualifying in practice. Queue, manoeuvre, tie up, pump, register, untie, move off.

It will be seen that compliance with the proposals for grey water disposal is the most difficult issue for smaller (<15m) production yachts. Cruising yachts normally carry one or two people, sometimes with additional visitors. Charter yachts normally carry up to 8 people. Their grey water output is necessarily modest, as they do not have the tank capacity or displacement to enable them to store much fresh water. The cost of major modifications to accommodate an additional tank and pumping out through a deck fitting would not be acceptable to most private yacht owners, who would be left with no alternative but to leave Turkish waters.

In relation to black water discharge, under Marpol regulations vessels are required to be no less than 3 miles offshore and travelling at a speed of 4 knots or more when pumping out. It does not appear reasonable, practicable or perhaps legal to prohibit discharge "even if over three miles from shore". Alternatively, vessels could be required to keep a passage log recording the position and date/time when they pump out at sea, available for inspection. Such an alternative to compulsory pumping out at a shore facility would attract widespread support.

We would urge that the scheme should be most urgently reviewed in relation to grey water for smaller yachts, including replacing the storage/shore pump out requirement with a prohibition of the use of synthetic detergents, which is the principal pollution hazard. In particular, we strongly recommend that the introduction of the Blue Card scheme (currently announced for 1 March 2010) should either be withdrawn or delayed for a period long enough to allow for the resolution of the problems we have identified, including the provision of sufficient pump-out facilities and the modification of the requirements to take account of the practical possibilities for smaller yachts.

As many cruising yachts are not marina based during the season, shore pump out facilities should be designed to be easily accessible. Preferably they should be located on a floating pontoon moored in open water, so that they can be easily and safely approached. Purpose built pontoons could service perhaps 4 boats at one time, and might potentially have the ability to process waste, and so be able to be located in more remote areas where no facility is presently planned.

### **Gulf of Göçek**

We understand the pressure on this area that these regulations address, and would generally welcome them. Our reservations are:

1. The grey water collection requirement, for the reasons given above.
2. The practicality of reserving space on buoys, these should be available on a first come basis.
3. Buoys need to be sited opposite bollards and (marked) suitable for larger vessels as well as smaller ones, properly secured and maintained. They are not yet in place.
4. The reasons for restrictions on cooking above deck are not understood.

In conclusion I must inform you that the publication of these regulations has already led to some of our members deciding not to sail to Turkey as intended, and to some who are already in Turkey making plans to leave rather than risk heavy penalties for contravening the regulations. We believe that the proposals as drafted could have the effect of driving all yacht owners out of Turkish waters, which would be as disappointing for them as it would be disastrous for the Turkish tourist business.

Yours faithfully,

DEUTSCHER SEGLER-VERBAND  
Kreuzer-Abteilung

Jürgen Feyerabend



This letter has also been sent to:

Mr Levent Ballar, TURMEPA  
Dr Ahmet Altiparmak, Governor, Mugla  
Mr Metin Kalkavan, DTO – Chamber of Shipping