

The New Turkish Regulatory Framework for Ship Construction, Modification and Repair

Introduction

Türkiye enacted a new Regulation on the Construction, Modification, Maintenance and Repair of Ships and Watercraft (the Regulation), which was published in the Official Gazette on 14 January 2026. The Regulation replaces a fragmented regime with a consolidated compliance framework that applies equally to foreign-flag vessels carrying out works in Turkish shipyards, repair facilities, and free zones. For foreign shipowners, the Regulation is not a procedural update. It materially affects project planning, contractual allocation of risk, classification strategy, and enforcement exposure when Türkiye is used as a construction or repair jurisdiction.

Scope of the Regulation

The Regulation applies whenever construction, conversion, maintenance or repair works are physically carried out in Türkiye, regardless of the vessel's flag, the governing law of the shipbuilding or repair contract, or the nationality of the owner or technical manager. In practical terms, any vessel (excluding military and certain state vessels) entering a Turkish yard for more than routine port services is within scope.

Mandatory Centralised Reporting

A central feature of the Regulation is the mandatory use of the Ship Industry Database (GSVP, *Turgut Reis Gemi Sanayi Veritabanı Programı*). All construction, modification and repair activities must be digitally recorded in this system. This is important because, although shipyards are formally responsible for data entry, non-compliance directly affects the vessel, not merely the yard. Furthermore, missing or inaccurate entries may block completion surveys, issuance of completion or conformity documents and acceptance of works by authorities or classification bodies.

The owners who treat GSVP as “yard admin” risk project delays and regulatory findings they do not control. We expect GSVP compliance to become a standard contractual warranty in Turkish shipyard contracts, with audit and indemnity mechanisms.

Permits for Construction and Modification

Foreign-flag vessels 12 metres and above undertaking construction or modification in Türkiye must now operate under an explicit authority permit. This rule applies even where the vessel is foreign flagged, the contract is governed by foreign law, and the vessel will not remain in Turkish registry. Failure to obtain the permit exposes the vessel to length-based administrative fines and procedural blockage.

Classification Oversight

The Regulation tightens classification involvement as construction and major modifications must generally be carried out under the supervision of an authorised classification society. Certain exemptions may apply where the contract clearly mandates compliance with a specific flag-state classification regime, but these are not automatic.

As a result, classification alignment now affects financing covenants, insurance continuity, and redelivery timelines. As mentioned above with regard to mandatory centralised reporting requirements, shipowners should not standstill by assuming that a Turkish yard will

reconcile Turkish regulatory expectations with flag-state or lender-driven class requirements without instruction.

Maintenance and Repair Reporting

All maintenance and repair works, either routine or major, must be reported in GSVP. While no separate permit is required for ordinary repairs, failure to report can prevent completion inspections and lead to sanctions.

Administrative Fines

The Regulation introduces a graduated, metre-based penalty system. Sanctions increase with vessel length and apply to unpermitted construction or modification, unauthorised operations, and failures in reporting or classification oversight. Hence, for large commercial vessels, these penalties are not symbolic. They are designed to change behaviour, not merely record non-compliance.

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Compliance

From a risk-management perspective, the Regulation calls for structural, not cosmetic, adjustments. The shipowners should allocate responsibility for permits, GSVP reporting, and classification coordination explicitly and include compliance warranties, audit rights, and indemnities. Furthermore, they should factor Turkish permit timelines into conversion and retrofit schedules and align yard activity with class, insurer, and lender expectations at the outset. Finally, using local counsel or compliance agents to monitor regulatory steps in real time and not relying solely on yard representations would be highly recommended.

Conclusion

The Regulation marks a clear policy shift as foreign-flag status no longer insulates shipowners from Turkish regulatory control when works are performed locally. For owners who use Turkish yards strategically, the framework is manageable. However, compliance must be embedded into contracts, timelines and technical

supervision. Those who treat it as background administration potentially risk delay, enforcement, and avoidable cost.

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