

# Turkish MTPL: A Comprehensive Overview

## Understanding the Turkish Green Card System & MTPL Application

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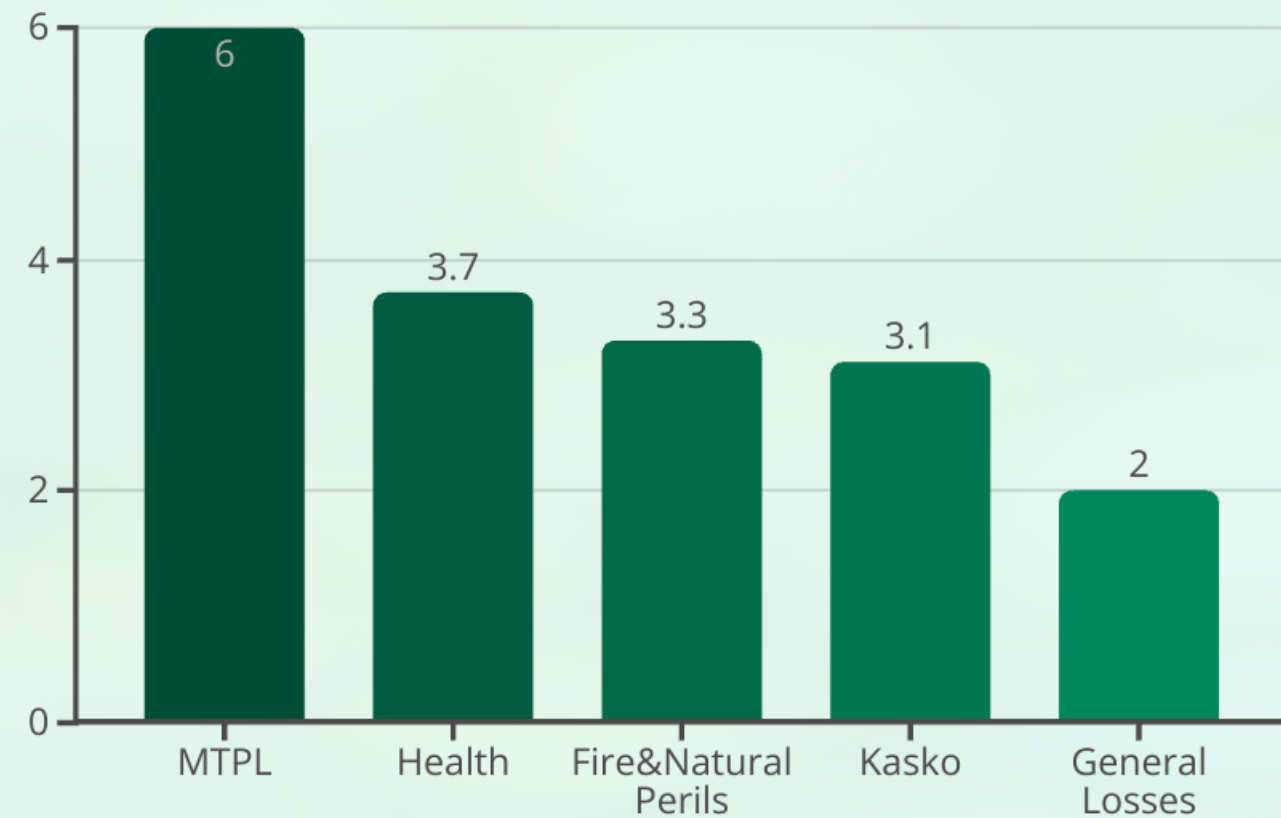
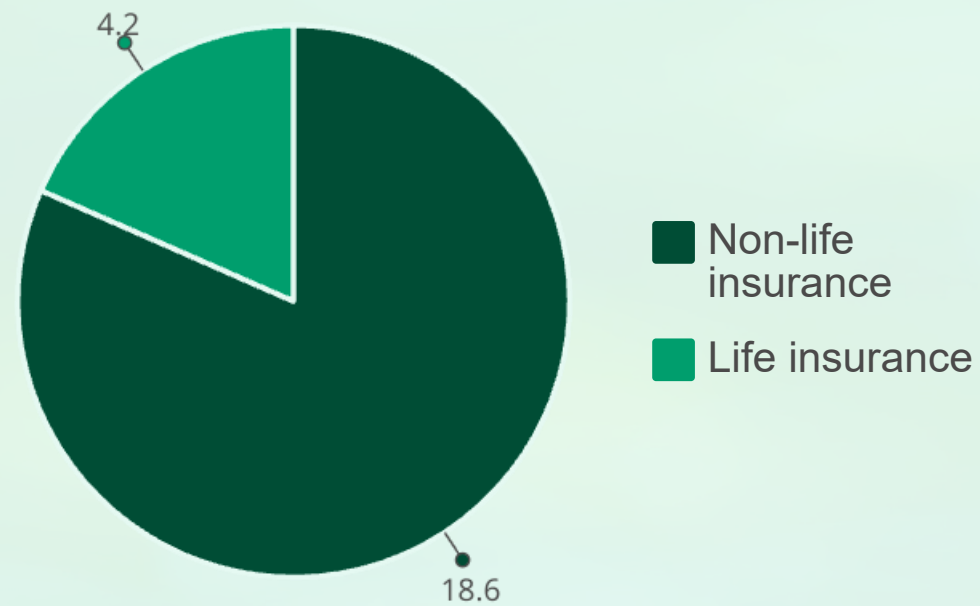
Domestic Claims Department Manager

Turkish Motor Insurers' Bureau



# Turkish Insurance Market Overview

- **71 insurance companies** operate in the market.
- **Premium production** reached **₺839 billion (€22.8 billion)** in **2024**



- **Claim payments:** ₺421 billion (€9,4 billion)

# Top Players

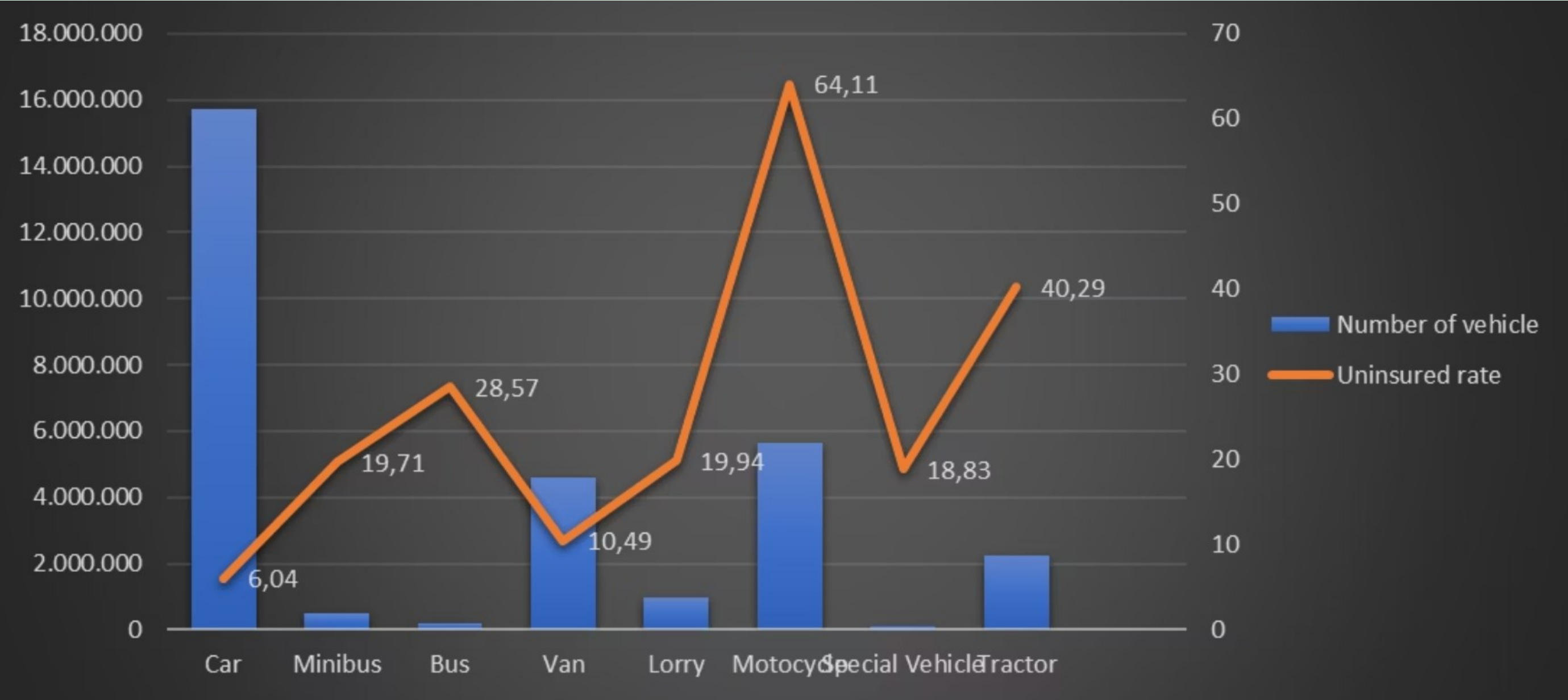
## Non-Life Companies

Rank	Company Name	Share (%)
1	Türkiye Sigorta AŞ	13.72%
2	Allianz Sigorta AŞ	11.15%
3	Anadolu TAŞ	9.42%
4	Axa Sigorta AŞ	8.27%
5	Sompo Sigorta AŞ	4.76%
Top 10 Total		67.89%

## Life Companies

Rank	Company Name	Share (%)
1	Türkiye Hayat ve Emeklilik AŞ	14.30%
2	AgeSA Hayat ve Emeklilik AŞ	14.10%
3	Viennalife Emeklilik ve Hayat	13.47%
4	Anadolu Hayat Emeklilik AŞ	12.43%
5	Garanti BBVA	9.61%
Top 10 Total		94.30%

# Uninsured Vehicle Rate - 2024



# Turkish Motor Insurers' Bureau



**Established: 1964**



**Members: 28  
insurance companies**

## Functions:

- Manages and issues Green Card insurance for Turkish-plated vehicles abroad.
- Handles claims for foreign-plated vehicles causing accidents in Turkey.
- Establishes and manages insurance and reinsurance pools.
- Risky Insured Pool





# Structure & Operation

- 1 Foreign Claims
- 2 Domestic Claims
- 3 Risky Insured Pool
- 4 Legal
- 5 Accounting
- 6 IT



# Green Card Reinsurance Pool Management

Bureau administers the Green Card Reinsurance Pool.

- Aim is that share claim burden and offer capacity to smaller insurers.
- All MTPL insurers are pool members.
- Reinsurance agreement managed by Bureau on members' behalf.
- Prepares tariffs for Green Card insurance.
- Claims paid from pool, retrocession shares calculated annually.
  - Turkish GCs still printed on green paper
  - Turkish GCs can be verified in real time via SBM (previously TRAMER)



# Green Cards Premium&Claims and Loss Ratio 2024 (€)

## Premium Growth

- 2023: 46 million EURO - 202.982 unit
- 2024: 48 million EURO - 249.530 unit

## Total Claims Paid

- 2023: €29 million (5,156 claims)
- 2024: €27 million (5,756 claims)

## Net Loss Ratio

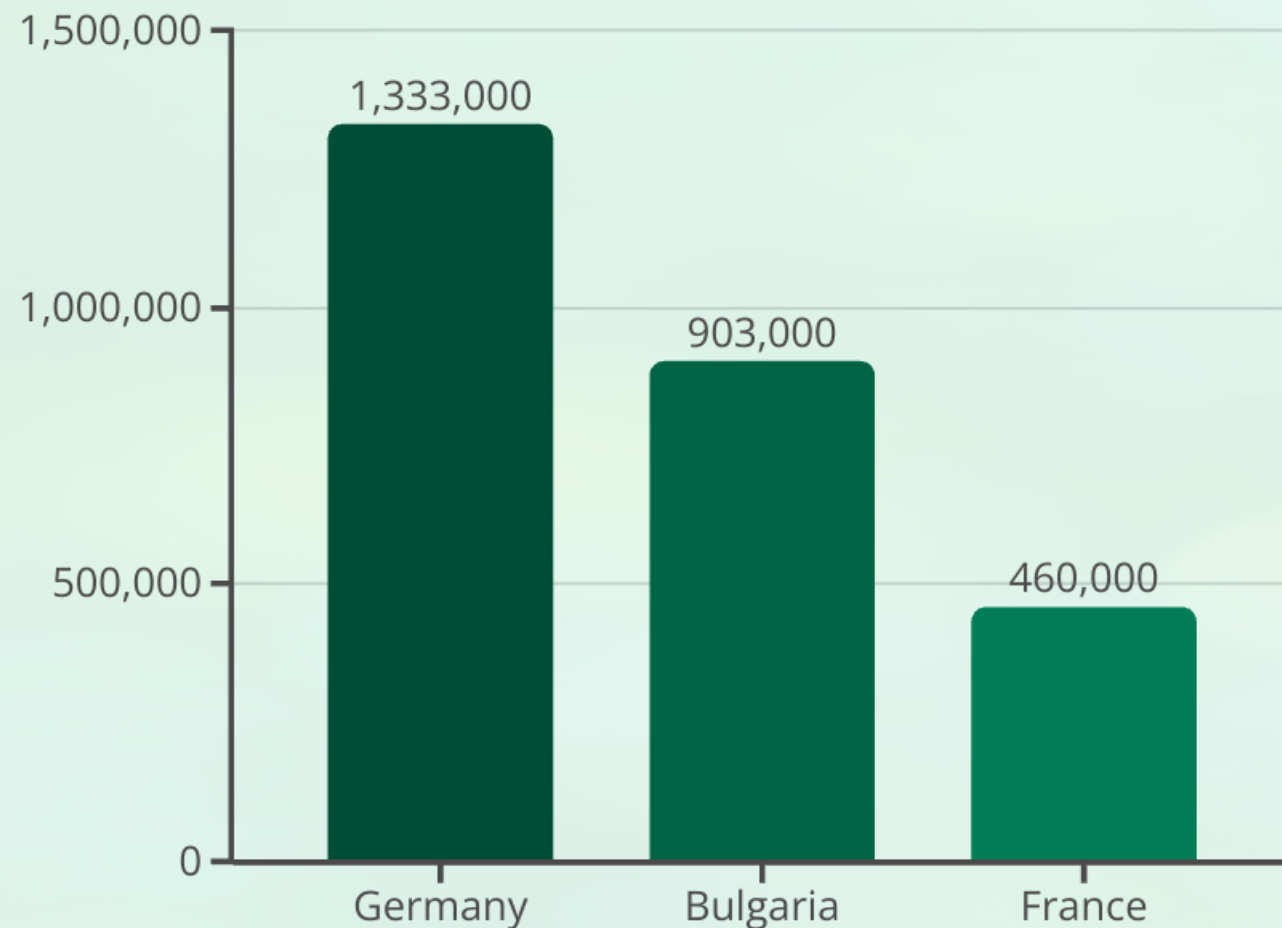
- 2023: 64.9% (after reinsurance)
- 2024: 68.4% (after reinsurance)





# Claims Paid in Turkey Involving Foreign Vehicles 2024

**186 million TRY claims paid** in 2024 (which is ~ **€5.1 million**)



## FRENCH VEHICLES 2024

Total 16 million TRY paid (€460.000)

- Material Damage: 9,1 million TRY ( €246,000)
- Bodily Injury: 7,9 million TRY (€214,000)
- In 2024 49 OGC, 83 BOGC has published to French Bureu

### At the moment

- 225 invoices are **unpaid** amount of 10 million TRY (~€300K)
- 160 invoices **over 60 days** amount of 7,5 million TRY (~€200K)

# General Outline of MTPL



## Legal Foundation

The Turkish Code of Obligations, The Commercial Law, The Insurance Law, The Highway Traffic Law, and MTPL.  
Insurance Clauses



## Geographical Coverage

MTPL insurance is valid within the borders of Turkey.



## Mandatory Protection

MTPL provides compulsory third-party liability coverage for all registered vehicles in Turkey.

# MTPL Coverage Limits - 2025

Limits determined by Insurance and Private Pensions Regulation and Supervision Authority (SEDDK)



## Material Damages:

300.000TRY p/v (€7,5K)  
600.000TRY p/a (~ €15K p/a)



## Bodily Injuries:

2,7 million TRY p/p (€69K)  
13,5 million TRY p/a (~ €344K)

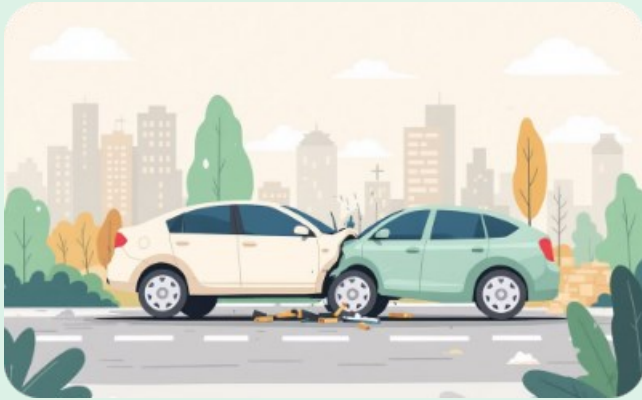


## Official Limits Can Be Checked

<https://www.guvencehesabi.org.tr/teminat-limitleri>



# Scope of the MTPL



## **Fault Liability Strict Liability**

Responsible for damages during operation



## **Definition of Operator**

Vehicle owner, registered person, long-term lessee



## **Scope of Responsibility**

Liable for driver's or assisting person's negligence



## **Compensation Requirements**

Insured's fault typically required; reduced by claimant's fault

# Scope of the MTPL

## Special Cases



### Multi-Vehicle Accidents

Injured party can claim full damage from any at-fault party



### Insurance Limit Application

Each insurer responsible for full policy limit regardless of fault percentage



### Social Security Institution

SGK covers health services and seeks recourse from our Bureau based on fault.



# Scope of the MTPL



## Coverage

Material damage, disability/death

Insurer and operator are jointly liable to injured parties.



## Trailers

Covered by towing vehicle's policy.

No separate policy required under standard conditions.

# What Damages are Covered



## Material Damages

- Vehicle damage,
- Expert fee and cost,
- VAT,
- Towing cost,
- Litigation expenses,
- Passenger items in the insured vehicle,
- Loss of value,
- Property damage (barrier, traffic lights, etc.).





# What Damages are Covered



## Disability and Death

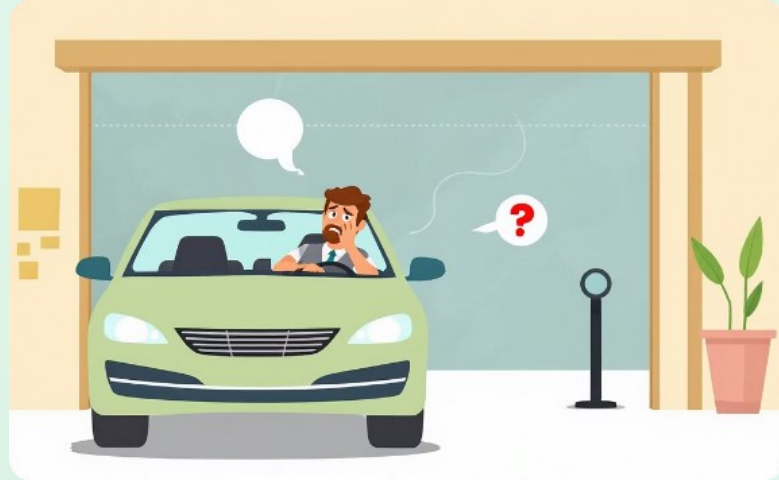
- Permanent disability and incapability of working,
- Compensation for loss of support (death),
- Funeral Cost,
- Medical expenses ,
- Temporary/permanent care expenses.

**❑ Moral damage (pain&suffering) is not covered.**





# Key Exclusions from MTPL Coverage



## Vehicle Deprivation

Loss of use costs excluded



## Loss of profit



## Environmental pollution damages



## Moral Damage

Emotional suffering compensation excluded



## Third-Party Operators

Repair shops and parking lots responsible for vehicles in their care



Insured remains personally liable for all excluded damages, regardless of MTPL coverage limits.

# Grounds for Recourse



## Alcohol/Drug Influence

Insurer can seek recourse against insured if driver was impaired



## Driving Without License

Valid grounds for insurer to recover compensation from insured



## Intentional Acts

Insurer can recover costs for intentional acts or gross negligence.



## Improper Vehicle Use

Unlicensed passenger transport or excessive loads trigger recourse rights.



# Statute of Limitations

1

- **Material Damages:** 2 years from knowing damage and liable party. 10 years absolute from accident date.

2

- **Injury:** 8 years statute of limitations. Longer period provides extended claim window.

3

- **Fatal:** 15 years statute of limitations. Significant extension for fatality claims.

Statute of limitations can be paused by filing a lawsuit or submitting a written demand to the insurer.

# Required Documents: Material Damages

## Core Documents

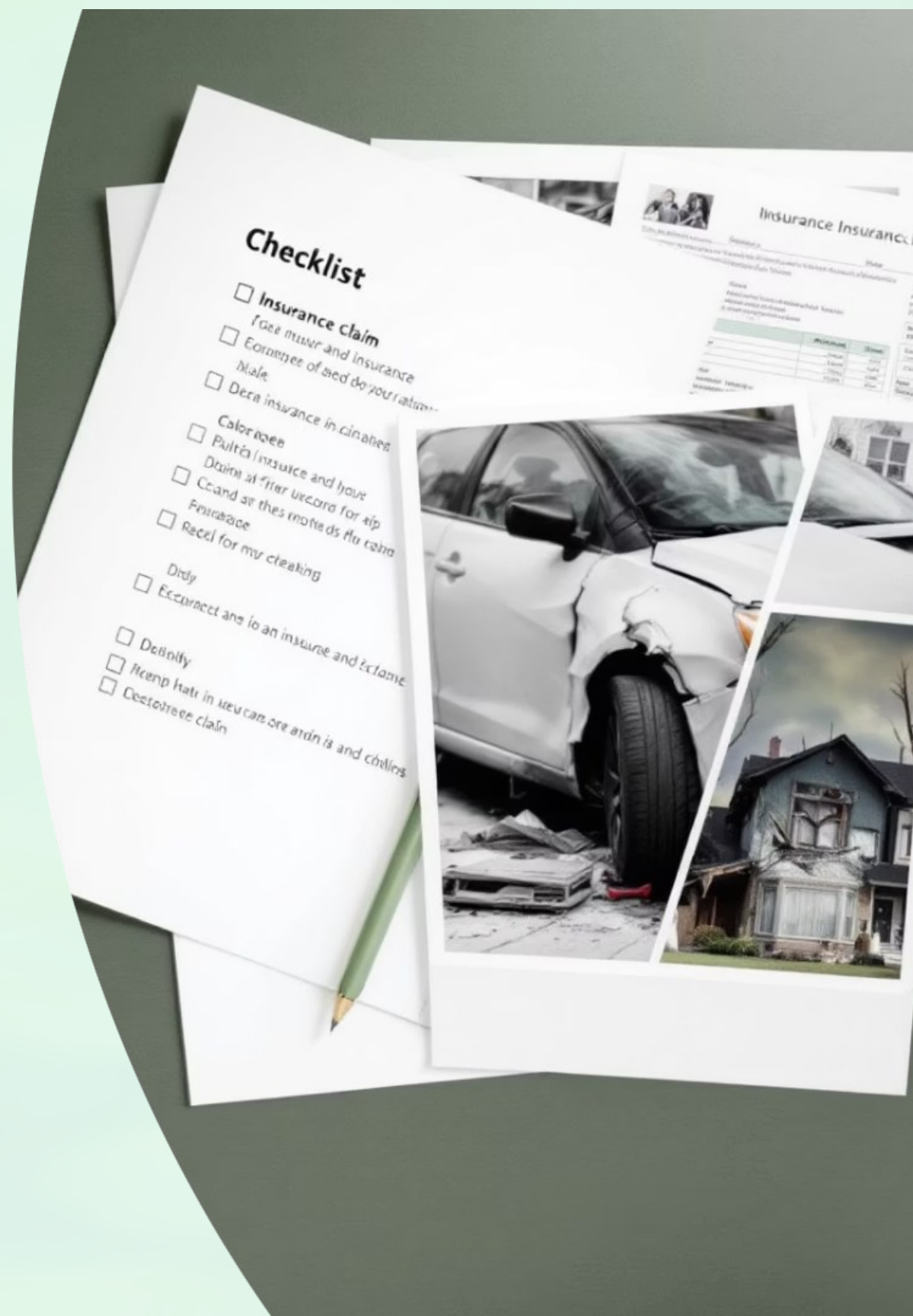
- Traffic accident report (official or agreed)
- Damaged vehicle's registration
- Photos of damaged vehicle and accident scene
- Injured party's bank details

## Other Material Damages

- Ownership proof (title deed)
- Invoices for property repair
- Evidence of value before damage

## Cases Where the Police have to be informed:

- Driving without driving licence,
- Under age (18)
- Doubt about alcohol or mental health problem
- If the TP is state institution
- Without valid MTPL
- Injury or fatality





# Required Documents: Bodily Injuries



## Loss of Support

Accident report and expert evaluations. Death certificate and inheritance documentation. Income statement verification.



## Permanent Disability

Health board and epicrisis reports. Forensic medical examinations. Treatment records and income documentation.



# Customer Identification Requirements

🛡️ Financial Crimes Investigation Board (MASAK)

🛡️ Note: All identification procedures are required for transactions exceeding certain thresholds and are regulated under the Regulation on Measures Regarding the Prevention of Laundering Proceeds of Crime and Financing of Terrorism



## Turkish Nationals

Valid identification documents include:

- National Identity Card
- Driver's License
- Passport



## Foreign Nationals

Acceptable identification includes:

- Passport
- Residence Permit
- Ministry-approved identification
- With their official entry records to TR



## Legal Entities

Turkish & Foreign Companies must provide:

- Registration documents
- Consulate certification or apostille
- Notarized translations (if required)

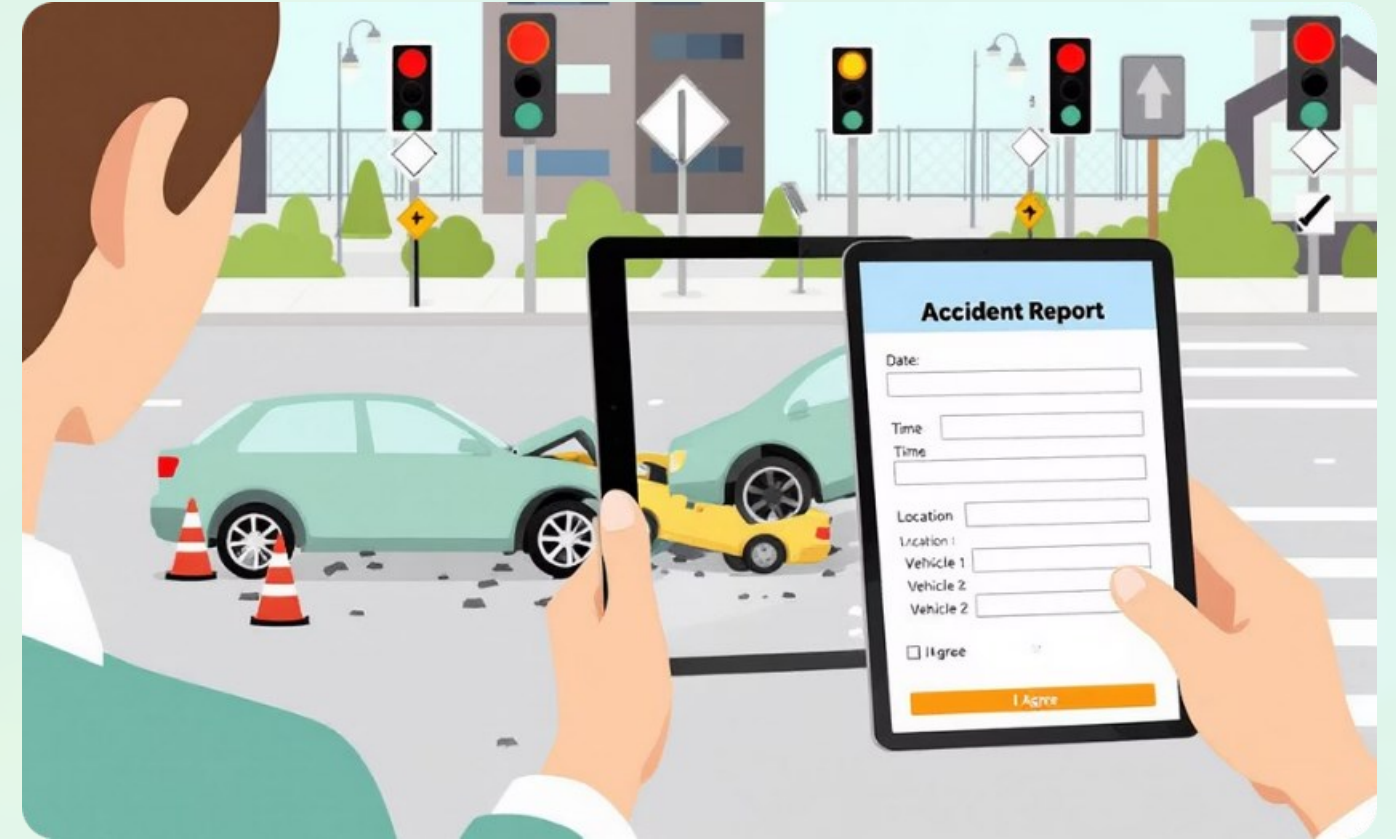
# TRAMER - SBM (Insurance Information Center)

## Central Hub for Insurance Data



### Central Electronic Hub

Established in 2003 as TRAMER, renamed SBM in 2008.  
Houses all **compulsory** insurance policy, endorsement, and claim records.



### Accident Report Process

Parties complete agreed report. Insurers submit report and photos to SBM. Fault assessment follows.



# Guarantee Fund

Protection for victims when standard insurance cannot provide coverage

## Purpose of the Guarantee Fund

Covers damages under compulsory insurance when specific conditions are met (up to valid limits)

## Bodily Injury Coverage Conditions

Liable party unknown; Uninsured at time of risk; Stolen/hijacked vehicle

## Additional Coverage Scenarios

Material & bodily injury if insurer bankruptcy/license revocation occurs

## Fund Distribution (2024)

€17 Million distributed to claimants



# Mediation & Legal Process

## Main Dispute Triggers:

- **Fault Disagreements**
- **Causal Link Disputes**
- **Loss of Value Calculations**
- **Insufficient Limits**

## Complex Claim Scenarios:

- **Multi-vehicle Accidents:** Complex liability determination in accidents involving multiple parties
- **Changing Disability Rates**
- **If the injured party lives outside Turkey :** disputes regarding the income and limits to be used for compensation calculation.

# Legal Proceedings

## Where to File a Traffic Accident Compensation Lawsuit

### Courts with Jurisdiction:

- Defendant's Domicile
- Plaintiff's Domicile
- Insurance Company HQ
- Accident Location

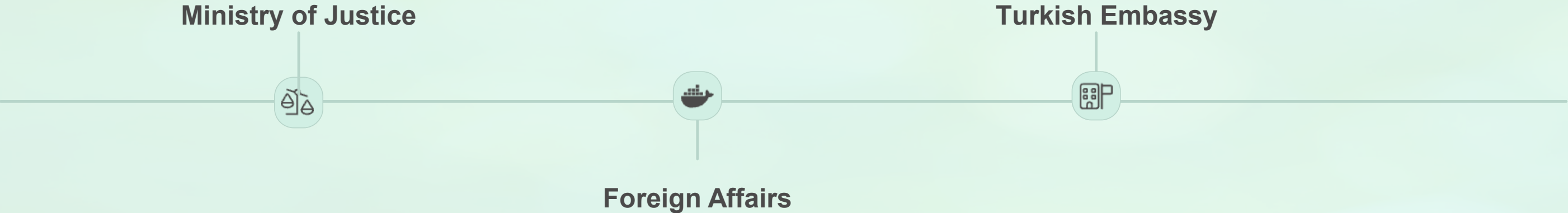
### Court Types:

- Civil Courts of First Instance
- Commercial Courts of First Instance



**Losing party has to pay court fees**

# Court Summons Notification Process:



# Insurance Arbitration Commission

- Established under Article 30 of Insurance Law.
- The Commission aims to resolve all disputes arising from insurance contracts.
- Parties involved: Policyholders/beneficiaries versus insurers (the risk bearers).
- Its purpose is to provide a fast and effective dispute resolution mechanism.
- Aims to reduce the workload of the courts.
- Solutions are provided quickly and at a lower cost.
- Offers advantages to parties by providing quick and cost-effective resolution.



A high-angle, close-up photograph of a wooden desk. In the upper right, a white ceramic cup with a yellow rim is filled with dark coffee. To its left is a small, round, light-colored terracotta pot containing a green succulent with pointed leaves. In the center, a white rectangular card lies flat, featuring the words "Thank you" written in a black, elegant cursive script. In the bottom right corner, a yellow folder or envelope is partially visible, with a white and black pen resting on it. The scene is lit with warm, natural light, creating soft shadows and highlighting the textures of the wood and the objects.

*Thank you*