



A New Era for Children and Gaming in Turkey: Understanding Law No. 5651's 2026 Amendments for Providers and Platforms

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I. Introduction: Expansion of Law No. 5651 into the Gaming Sector

On April 2 2026, the Turkish Grand National Assembly's ("TBMM") Health, Family, Employment, and Social Affairs Commission approved a transformative set of amendments to Law No. 5651 on the Regulation of Publications on the Internet and Combatting Crimes Committed by Means of Such Publications ("Law No. 5651"), which were published in the Official Gazette of May 1, 2026. These provisions, integrated into a broader "Omnibus Bill," represent a turning point in Türkiye's digital regulatory strategy by explicitly extending the legislative umbrella to the global gaming industry. The amendments are proposed from a perceived regulatory gap where children's exposure to digital environments—specifically online gaming and social media—has outpaced existing legal protections. The primary objective is to address systemic risks such as cyberbullying, exposure to violent content, and the psychological harm associated with unregulated digital interactions. By shifting the focus toward the "Social Services" context, the Turkish legislature indicates that digital platforms are no longer merely technical intermediaries but are now considered active participants in the social and psychological development of the youth.

Against this background and in brief, the 2026 amendments have introduced 2 significant obligations impacting all social network providers and gaming platforms: (i) Social network providers are now prohibited from offering services to children under the age of 15 and must implement technical measures to verify user age and (ii) foreign game platforms with more than 100,000 daily access in Türkiye are now mandated to appoint a local representative in Türkiye. Below are the details of the 2026 amendments.

II. Newly Introduced Definitions and Scope

A fundamental aspect of the 2026 amendments is the introduction of precise legal definitions designed to eliminate ambiguity in enforcement. Under Article 21 of the proposal, Law No. 5651 will be amended to include official definitions for “Game”, “Game Distributor”, “Game Developer,” and “Game Platform”. Previously, many gaming platforms operated under general categories that did not account for the interactive and transactional nature of modern gaming. For the purposes of this article, the new definitions specifically address (i) Game Developers, i.e. persons creating the software and interactive content, are held accountable for the inherent risks of the game’s design, and (ii) Game Platforms, i.e. platforms providing the software or technical infrastructure enabling the display, sale, distribution, downloading, or playing of digital games and related additional content over the internet; and who enable or coordinate user’s access to games or content, license management, or interaction between users. This expansion ensures that every actor in the gaming sector has a distinct set of legal obligations towards the Turkish user base.

III. Mandatory Age Rating and Content Classification

The 2026 amendments move away from a reactive "complaint-based" system toward a proactive classification regime. Under the newly proposed Additional Article 5, game platforms are now legally required to provide games, classified according to age appropriateness.

IV. Content Moderation and Removal Obligations

The burden of ensuring safety falls heavily on game platforms through a "default restriction" mechanism. Specifically, if a game has not been formally rated according to Turkish standards, game platforms are legally required to mark the content as the highest age rating by default, effectively restricting unrated global content from reaching the market. Furthermore, game platforms are no longer merely conduits; they are held responsible for identifying and removing content that is not appropriately rated.

V. Local Representation Requirement for Foreign Platforms

To ensure that foreign entities are within the reach of Turkish judicial and administrative authorities, the amendments reinforce local presence requirements. Foreign game platforms with more than 100,000 daily access in Türkiye are now mandated to appoint a local representative who can be a natural or legal person, and notify the representative to Information and Communication Technologies Authority (“ICTA”). This representative will serve as the

primary legal point of contact for the Turkish authorities. The publication of this representative's contact information is mandatory.

VI. Parental Control and User Protection Measures

Game platforms are mandated to provide parental control tools that are transparent, easy to understand, and user-friendly to ensure a safe environment for minors. These tools must empower parents by providing mechanisms to effectively manage account settings and oversee financial interactions. Specifically, any credit-based or monetary transactions, including purchases, rentals, and paid subscriptions, must be subject to parental consent or approval, thereby preventing unauthorized expenditures and enhancing digital oversight.

VII. Information Requests and Cooperation with Authorities

The ICTA is authorized to request comprehensive explanations from gaming platforms regarding their organizational structure, information technology systems, and data processing mechanisms. Platforms are obliged to provide all requested information and documents promptly, adhering to the specific deadline set by the Authority, which will not exceed fifteen days.

VIII. Sanctions and Enforcement Mechanisms

The law establishes a multi-tiered enforcement mechanism involving substantial financial penalties and technical restrictions. If a gaming platform fails to fulfill its obligations, the ICTA will issue a formal notification; failure to comply within 30 days may result in an initial administrative fine ranging from 1 million to 10 million Turkish Liras. Should the non-compliance persist for another 30 days following the notification of this fine, a second penalty between 10 million and 30 million Turkish Liras may be imposed, with the exact amount determined by the severity of the violation and its impact on users.

If the platform still fails to act within 30 days of the second fine, the President of ICTA may apply to a criminal judgeship of peace to throttle the platform's internet traffic bandwidth by 30%, and subsequently by up to 50% if the violation remains unrectified. Access providers are required to implement these judicial bandwidth restrictions within four hours of notification. If the platform eventually fulfills its obligations, the bandwidth restrictions are immediately lifted, and the administrative fines are reduced to one-fourth of their original amount.

IX. Practical Implications for the Gaming Industry

The expansion of Law No. 5651 signals that Türkiye is moving toward a more localized and regulated digital environment for gaming. For international gaming companies, the practical implications are profound, requiring technical integration of Turkish-compliant age verification and parental control interfaces. Operational readiness must also be prioritized for game platforms exceeding the designated access threshold, as establishing local representative offices will be essential. As the amendments have now come into effect as of May 1, 2026, companies active in the Turkish gaming sector must adopt a proactive compliance posture to navigate this new regulatory era. A six-month grace period has been introduced for implementation of these amendments, and compliance should be ensured within this due time.

X. Other Significant Obligations

While not related to gaming, the amendments also introduce other significant obligations for social network providers, who are defined as “individuals or legal entities that enable users to create, view, or share content such as text, images, audio, and location on the internet for the purpose of social interaction”. Accordingly, social network providers are now prohibited from offering services to children under the age of 15 and must implement technical measures to verify user age. For children above the age of fifteen, social network providers must take specialized measures to offer differentiated services tailored to their age group. All measures adopted within this scope must be published on the social network provider's own website.

Furthermore, parental control requirements are also envisaged for social network providers. Under Additional Article 4 (20), social network providers must provide clear and understandable tools allowing parents to (i) manage account settings, monitor and limit screen time, (ii) make fee-based transactions such as purchases, rentals, and paid memberships subject to parental permission or approval, and (iii) monitor and limit screen usage time. These measures are designed to return digital sovereignty to the family unit, ensuring parents have final oversight of a minor's digital activity and spending.

Social network providers are also obligated to take measures to prevent deceptive advertising. For providers with a daily reach of more than 10 million users in Turkey, the window for compliance has been significantly narrowed. Under Additional Article 4 (22), decisions issued by the authorities regarding content that threatens public safety or order, governed by Article 8/A, must be implemented within one hour. Furthermore, these social network providers are expected to take all necessary technical and administrative measures to ensure that content subject to removal or access-blocking orders does not reappear on their own platforms.

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