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Turkmenistan

Transport and Logistics: *2026* Guide

Road, rail, sea and air freight, transit and project cargo

A practical guide for foreign shippers, contractors and logistics companies moving goods into, out of or through Turkmenistan.

ROUTES AND INFRASTRUCTURE
Corridors, Turkmenbashi Port and railways

PERMITS AND LICENCES
Foreign carriers, charges and forwarding

TRANSIT AND PROJECT CARGO
GPS monitoring, TIR and heavy vehicles

LIABILITY AND CLAIMS
New Civil Code, CMR, SMGS and Montreal Convention

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About this guide and its sources

ABOUT THIS PUBLICATION

This issue provides a practical overview of the rules governing freight transport into, out of and through Turkmenistan. It draws on Turkmenistan's legislation in its official Turkmen-language version, international treaties as recorded by their depositaries, and official announcements. Editorial update: 19 November 2026. Appendix F describes the status of the sources; Appendix C lists points to check before shipment.

This publication is for general information and does not constitute individual legal, tax, customs or other professional advice. Bilermen Hyzmatdashlar LLP is a consultancy and does not provide legal services requiring a licence.

The conditions of a particular shipment depend on its route, mode of transport, cargo, vehicle registration country, applicable international treaty and contract with the carrier. Charges and tariffs in Turkmenistan are set by separate instruments, often for a limited period. Before contracting for carriage or dispatching goods, check current requirements against primary sources and consult a qualified professional where necessary.

How to use this guide

This guide is for foreign companies shipping equipment, materials or project cargo to Turkmenistan, working with a local forwarder or planning transit through the country. It addresses practical questions: which law and treaty govern carriage, which permits and charges apply to foreign carriers, who issues licences following the reorganisation of transport authorities, how to move heavy cargo and when to submit claims.

This issue follows Customs and Imports (Issue No. 4), which covers customs declarations, temporary storage and the customs transit procedure. Here, the focus is on carriage itself: carriers, forwarders, permits, routes and liability for goods.

We distinguish three categories. Statements directly supported by legislation or a depositary record include references to the relevant article or paragraph. Features of the legislation and points to check are highlighted as "Please note". Observations from public reports and our work appear under "Practice"; they are not legal rules. "CC" refers to Turkmenistan's 2025 Civil Code, effective from 1 January 2026.

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CHAPTER 01

Key findings

1. **Since 1 January 2026, contracts of carriage and freight forwarding have been governed by the new CC.** Articles 721–761 cover carriage; Articles 784–797 cover freight forwarding. Relationships arising before 2026 are subject to the transitional provisions of the law bringing the Code into effect. Instruments referring to the former Articles 742–755 must be read in light of the new numbering.
2. **Transport authorities have been reorganised.** The Decree of 11 July 2025 replaced the Transport and Communications Agency with the Ministry of Automobile Transport and the Ministry of Railway Transport. Aviation falls under the Türkmenhowaýollary State Service; maritime and river transport under the State Service for Maritime and River Transport. The Ministry of Automobile Roads was established in February 2026. Documents using former authority names must be checked against the succession arrangements.
3. **As a general rule, a foreign truck needs a permit for its journey.** The 2013 procedure applies to vehicles over 3.5 tonnes and provides for bilateral, transit and third-country permits; one permit covers a single outward and return journey. The permit regime and exemptions must be checked against the vehicle's registration country, the bilateral agreement and the nature of the operation (Chapter 4). Foreign carriers are generally prohibited from carrying goods between points within Turkmenistan (Road Transport Law, Article 28).
4. **Charges for foreign vehicles include permits, liability insurance, GPS and separate road and service payments under Resolution No. 4746.** For foreign trailers without a foreign tractor unit, Resolution No. 764 sets a charge of USD 150 for entry or USD 100 for transit, subject to its conditions. Restrictions on fuel remaining in tanks at exit must be checked separately (Chapter 4).
5. **Foreign trucks are monitored by GPS from the entry customs office to the exit customs office.** The first pilot eTIR movements involving Turkmenistan across the Caspian took place in July 2026; availability for a particular journey must be confirmed.
6. **Road transport licensing is governed by Resolution No. 1629 of 27 December 2025.** The Ministry of Automobile Transport issues licences for freight transport subcategories from 3.5 tonnes, excluding dangerous goods, and vehicles must be entered in the register. Two licensing provisions conflict with the law as amended in April 2026 (Chapter 4). The equivalent discrepancy for forwarding was resolved in October 2026 (Chapter 8).
7. **Turkmenistan is a party to CMR, its Protocol, e-CMR, TIR and AETR, but not ADR.** Dangerous goods are carried by road under the 2018 national rules, with route approval sought 10 days in advance. The 1999 Montreal Convention has applied to Turkmenistan since 17 May 2026.
8. **Heavy and oversized cargo requires a single-journey permit.** The internal affairs authorities issue it for a specific route and period in coordination with the road authority. Thresholds include gross weight over 36 tonnes, height over 4 metres or width over 2.5 metres. Payment of the charge does not remove liability for damage to roads.
9. **Claim periods are short and differ by mode.** Under the CC, apparent defects must be notified on receipt, concealed defects in writing within seven days, and delay within 21 days; the limitation period is one year. CMR, SMGS, the Merchant Shipping Code and the Air Code have their own time limits (Appendix B).
10. **The language versions of the CC differ on a key forwarding provision.** In the Turkmen text of Article 784, the forwarder acts in the customer's name; in Russian, in its own name. The contract should expressly state in whose name the forwarder contracts with carriers.

CHAPTER 02

Legal framework and authorities

Laws and codes

The Law on the Fundamentals of Turkmenistan's Transport Policy of 9 June 2018, No. 28-VI, sets the sector's framework: policy objectives, infrastructure development and international cooperation. It does not itself authorise a journey. Individual modes are governed by:

- Road Transport Law of 2 March 2013, No. 377-IV, last amended on 22 November 2025 by No. 184-VII;
- Law on Automobile Roads and Road Activities of 2 March 2013, No. 376-IV, last amended on 11 April 2026 by No. 203-VII;
- Railway Transport Law of 28 February 2015, No. 186-V, last amended on 24 July 2022;
- Merchant Shipping Code of 23 October 2008, No. 222-III, and Air Code of 10 January 2012, No. 255-IV;
- Transport Security Law and Law on Main Pipeline Transport of 4 May 2013, No. 394-IV. The latter is relevant to oil and gas projects but is outside this issue's scope.

Contracts of carriage and forwarding, and cargo liability, are governed by the CC approved by Law No. 162-VII of 28 June 2025 and effective from 1 January 2026. The Customs Code sets carriers' duties on arrival, in transit and following an accident. The Law on Licensing Certain Types of Activity determines which transport services require licences.

The Road Transport Law expressly gives precedence to international treaties: where a treaty of Turkmenistan establishes different rules, the treaty rules apply (Article 2(3)). For an international journey, first identify the applicable convention or bilateral agreement, then the national requirements it does not replace.

Responsibilities after reorganisation

Presidential Decree No. PP-546 of 11 July 2025 abolished the Transport and Communications Agency under the Cabinet of Ministers and distributed its functions among sectoral authorities. Decree No. PP-623 of 13 February 2026 abolished the State Agency for Management of Road Construction, established the Ministry of Automobile Roads on its basis and designated the Ministry as the Agency's legal successor.

Area	Competent authority (under the 2025–2026 decrees and the list of licensing bodies)
Road carriage, foreign carrier permits and road freight forwarding	Ministry of Automobile Transport; permits processed by the Türkmenulaggözegçilik State Enterprise
Automobile roads and heavy vehicle route coordination	Ministry of Automobile Roads
Special permits for heavy and oversized vehicles; dangerous goods routes	Internal affairs authorities (road traffic safety)
Rail transport	Ministry of Railway Transport

Area	Competent authority (under the 2025–2026 decrees and the list of licensing bodies)
Maritime and inland waterway transport, ports and maritime forwarding	State Service for Maritime and River Transport
Civil aviation and air freight forwarding	Türkmenhowaýollary State Service
Carrier customs controls, transit and GPS monitoring	State Customs Service
Dangerous goods transport licensing and safety certificates	Türkmenstandartlary Main State Service

PRACTICE

In its report on transport sector performance for the first nine months of 2026, the government names the same bodies: the Ministries of Railway Transport and Automobile Transport, the Türkmenhowaýollary and Maritime and River Transport State Services, and the Ministry of Communications. Documents and websites still referring to Türkmenawtoulaglary, Türkmendemirýollary or the Transport and Communications Agency reflect the former structure.

PRACTICAL TAKEAWAY

Before submitting an application or enquiry, identify the authority responsible on the relevant date and for the relevant mode. A permit or approval issued by a former authority before reorganisation does not automatically lapse, but renewal and reissuance must be handled by its successor.

CHAPTER 03

Routes and infrastructure

Turkmenistan borders Kazakhstan, Uzbekistan, Afghanistan and Iran and has access to the Caspian Sea. Foreign shippers can therefore choose between several modal combinations: road transport across a land border, rail transport with a change of gauge at the Iranian border, or a ferry or ship across the Caspian.

International corridors

Turkmenistan ratified the Ashgabat Agreement establishing an international transport and transit corridor (Mejlis Resolution No. 203-IV of 21 May 2011) and the Lapis Lazuli Transit and Transport Cooperation Agreement (Resolution No. 674-V of 25 November 2017). Law No. 58-VII of 30 September 2023 provided for accession to the TRACECA Basic Agreement. The 1965 Convention on Transit Trade of Land-locked States has applied to Turkmenistan since 21 February 2025.

According to the UN depositary, on 27 November 2016 Turkmenistan acceded to several instruments: the UN ESCAP Intergovernmental Agreements on the Asian Highway Network and the Trans-Asian Railway Network (Mejlis Resolutions Nos. 444-V and 445-V of 12 September 2016), the Agreement on Dry Ports, and the 1982 International Convention on the Harmonization of Frontier Controls of Goods. It acceded to the European Agreement on Main International Railway Lines on 31 August 2020, and to the 1972 Customs Convention on Containers and the 1994 Convention on Customs Treatment of Pool Containers on 14 June 2021.

PLEASE NOTE

The Caspian transport cooperation agreement was signed in Aktau on 12 August 2018 and ratified by Turkmenistan (Mejlis Resolution No. 110-VI of 1 December 2018); Kazakhstan's legal database records entry into force on 22 March 2021. Turkmenistan is depositary of the Ashgabat Agreement. Besides the founding states, parties include Kazakhstan, Pakistan and India; Qatar withdrew in 2013. Kyrgyzstan approved accession on 22 August 2024, Armenia on 8 May 2025; on 24 February 2026, Armenia's Constitutional Court held the obligations constitutional. Check the start of participation with the depositary.

Russia consented to Turkmenistan's accession to the International North–South Transport Corridor (INSTC) agreement in July 2023. India's MEA briefs differ: in 2025, accession in July 2023; in 2026, interest in joining. Check the status with the depositary, Iran. The Trans-Caspian International Transport Route (TITR) Association includes railways and ports from Kazakhstan, Azerbaijan, Georgia, Türkiye and other countries; it has no Turkmen members.

PRACTICAL TAKEAWAY

Corridor membership does not entitle a carrier to operate without transport permits, customs clearance and approvals. Corridor agreements provide the basis for special national arrangements, such as foreign trailers hauled by local tractor units (Chapter 4).

Port, railway and roads

Turkmenbashi International Seaport opened in May 2018. According to the state news agency, it comprises a ferry and passenger terminal designed for 300,000 passengers and 75,000 trailers annually, a container terminal for 400,000 TEU, a general cargo terminal for 4 million tonnes annually and a dedicated polypropylene terminal. These are design capacities, not a guarantee of availability on a particular date.

Turkmenistan's railways use a 1,520 mm gauge. The Turkmen section of the Kazakhstan–Turkmenistan–Iran line, Uzen–Bereket–Etrek–Gorgan, was fully commissioned on 3 December 2014. Iran is also served by the Tejen–Serakhs–Mashhad route; Afghanistan by Serhetabat–Torghundi and Kerki–Imamnazar. Iran uses a 1,435 mm gauge, requiring transshipment or bogie exchange at the border. In August 2025, Turkmenistan and Iran agreed to build one standard-gauge and one broad-gauge line at Serakhs.

The Ministry of Automobile Transport reported on 4 September 2026 that the approximately 600 km Ashgabat–Turkmenabat expressway had been commissioned. For heavy vehicles, check the road category, bridges and overpasses along the particular route (Chapter 10).

PRACTICE

A regular ferry service operates between Alat (Azerbaijan) and Turkmenbashi. Operator ASCO reports carrying 28,178 trucks and other vehicles across all its Caspian routes in January–August 2026, up 10% year on year. Ferry schedules, queues and freight rates are not prescribed by legislation and must be confirmed with the operator at dispatch.

CHAPTER 04

Road transport

Contract and documents

The Road Transport Law requires a contract and a consignment note for freight carriage (Articles 23–24). Articles 25–26 allocate duties concerning documentation, loading, cargo safety and compensation. The Road Freight Carriage Rules approved by Resolution No. 14681 of 1 April 2016 allow paper and/or electronic consignment notes (paragraph 9) and address vehicle suitability, declared value and liability. Rates are generally contractual; state regulation applies only in specifically prescribed cases (Article 4(3)).

The CMR consignment note remains the basic document for international road carriage. Turkmenistan has been a party to the 1956 Convention on the Contract for the International Carriage of Goods by Road since 17 December 1996, to its 1978 Protocol, and, since 21 March 2023, to the Additional Protocol on electronic consignment notes (e-CMR). Participation in e-CMR does not guarantee acceptance at every border crossing; confirm operation of the system with the particular partner.

Journey permits

The procedure for issuing permits to foreign carriers was approved by Order No. 41-Ö of 3 April 2013 (registration No. 687), as amended in 2016 and 2024. It applies to goods vehicles with a gross weight exceeding 3.5 tonnes and distinguishes:

- a bilateral permit — carriage between the registration country and Turkmenistan;
- a transit permit — passage through Turkmenistan;
- a third-country permit — carriage to or from a third country.

One permit covers a single outward and return journey along the specified route (paragraph 22). Electronic permits (e-permit) may be used where the two states have agreed to exchange them (paragraph 14). Permit exemptions in paragraphs 24–28 cover specific situations and do not constitute a general exemption for foreign carriers. Permit exchanges with each country are governed by the bilateral agreement and joint commission decisions. Confirm eligibility for a permit and the required quota for the carrier's registration country. Paying an additional charge above the quota does not itself confer a right of entry.

A foreign carrier may not carry goods between points within Turkmenistan unless legislation provides otherwise (Road Transport Law, Article 28(1)). Domestic distribution after customs clearance must therefore be performed by a local carrier.

Foreign drivers: visas and migration registration

Foreign drivers enter on a visa. Turkmenistan's consulates provide a driver visa (DR). According to the Embassy in Belarus, this is a multiple-entry visa allowing up to 15 days per entry, issued against an invitation from the State Migration Service, normally obtained by the Turkmen counterparty. Check documents and processing times with the consulate serving the driver's place of residence. Since 1 October 2026, the State Migration Service has issued electronic visas through the e-Visa system (Presidential Resolution No. 1954 of 10 September 2026; State Migration Service Order No. 102-iş of 17 September 2026, reg. No. 1972). The Order provides for three categories: business (e-BS) for state-level international events, humanitarian (e-HM) and tourist (e-TU). There is no driver category, so in our assessment drivers still need a DR visa from a consulate.

Since April 2026, drivers' registration has been expressly governed by the Migration Law, as amended on 11 April 2026. Foreign crew members engaged in international road transport and staying for no more than 15 calendar days from entry are registered electronically at the border crossing's migration post, with biometric data collected (Article 12(6)(3)). Where unforeseen circumstances prevent departure, the head of the State Migration Service may authorise an extension of up to 15 calendar days. The driver control procedure remains governed by Migration Service Order No. 4 of 9 January 2016 (registration No. 963): Türkmenulaggözegçilik sets the route, which must be followed; where the visa is issued by a consulate, the consignee or consignor is the host; for unloading outside a terminal, the host informs the Migration Service when the driver leaves; restricted areas require a permit. In our assessment, the former five-day registration threshold in the 2016 Order yields to the new statutory rule. A stay of up to 15 calendar days from entry is a condition for electronic crew registration at the crossing, not a visa-free period.

Charges for foreign vehicles

Presidential Resolution No. 4746 of 7 July 2000, as amended by No. 257 of 14 September 2022, establishes several separate payments for entry and transit by foreign trucks. The table below gives USD rates by payload category. Apply the conditions and exemptions in accordance with the full instrument.

Payment	Up to 10 t	10–20 t	Over 20 t
Entry permit: without / with Amu Darya bridges	110 / 70	160 / 100	230 / 150
Transit permit: without / with bridges	105 / 65	155 / 95	225 / 145
Travel only to a border railway station	45	62	82
Third-party liability insurance for up to 3 months*	100	100	100
GPS: ordinary entry (border station only)	10 (3)	10 (5)	10 (10)
Veterinary disinfection (border station)	5 (2)	5 (3)	5 (3)
Quarantine inspection of regulated transit cargo	5	5	5
Türkmenulaggözegçilik processing	5	5	5
Pontoon and river crossings	40	60	80
Amu Darya bridges on designated routes	40	60	80
Entry/transit above the exchanged permit quota**	150	150	150

*Additional charges: transit declaration — USD 5; charge linked to refuelling in Turkmenistan — USD 0.20 per kilometre under paragraph 9 of Appendix 1 to Resolution No. 4746 (an exception is provided for Iranian vehicles). *The insurance payment may be waived if the vehicle has an international document recognised by Turkmenistan. **The above-quota charge does not constitute general permission to enter; eligibility must be checked by registration country. Some payments apply only where the specified conditions are met, so the amounts must not simply be added together. Charges for foreign trailers without a foreign tractor unit are governed separately by Resolution No. 764.*

Diesel remaining in tanks at exit is a separate issue. Latvia's Road Transport Administration reported on 10 August 2026, citing Turkmenistan Presidential Resolution No. 1917 of 5 August 2026, that from 10 August the duty-free allowance in standard tanks was reduced to 150 litres, with TMT 30 charged per excess litre. Chronicles of Turkmenistan and Turkmen.news reported the same change. Previously, from 1 April 2026, the allowance was 300 litres and the charge TMT 20 per litre. Confirm the payment procedure for foreign carriers with customs and the carrier before travel. This is separate from the USD 0.20 per kilometre charge under Resolution No. 4746.

Foreign trailers and local tractor units

A special arrangement applies to goods from, or transiting through, countries of the Ashgabat Agreement and the Lapis Lazuli Corridor: a foreign trailer or semi-trailer crosses the border and continues through Turkmenistan behind a local tractor unit. The Instruction approved by Order No. 59-iş of 24 December 2024 (registration No. 1843) structures this through a freight forwarding contract; a licensed local carrier may be engaged. The Instruction refers to the former 1998 CC; Articles 784–797 of the new Code apply to contracts in 2026.

Before 2023, charges on owners of these trailers were set annually by Presidential Resolution, from 15 November to 15 November of the following year. The 2023 Resolution no longer specifies an end date:

Instrument	Period	Provisions
Resolution No. 1981 of 3 November 2020	15.11.2020–15.11.2021	Entry — USD 150; transit — USD 100 per trailer: permit 130/75, geolocation device 10, veterinary disinfection 5, quarantine inspection (transit only) 5, Türkmenulaggözegçilik services 5
Resolution of 10 November 2021	15.11.2021–15.11.2022	Reported in the press; IRU gives the same USD 150/100 amounts
Resolution No. 293 of 20 October 2022	15.11.2022–15.11.2023	Entry — USD 150; transit — USD 100 (press reports on the Resolution)
Resolution No. 764 of 6 November 2023	From 15 November 2023; no end date specified	Entry — USD 150; transit — USD 100; the same components as in 2020 (permit 130/75, geolocation 10, veterinary disinfection 5, quarantine —/5, Türkmenulaggözegçilik 5). The Resolution also added a provision to the Road Freight Carriage Rules concerning an instruction for these operations

PLEASE NOTE

Resolution No. 764 is published by the Ministry of Automobile Transport. Paragraph 6 brings it into effect from 15 November 2023 with no end date; Instruction No. 59-iş of 24 December 2024 refers to it. In our assessment, the USD 150/100 rates remain applicable in 2026 within the scope of paragraph 1. Check the amount and conditions with the Ministry or Türkmenulaggözegçilik before departure.

Local carriers: licences and the register

When engaging a Turkmen carrier, request its licence, licensed subcategory and certificate of entry of its vehicles in the unified road transport register. Since 2026, licensing has been governed by the Regulation approved by Resolution No. 1629 of 27 December 2025, published by the Ministry of Automobile Transport; the 2010 Resolution No. 11350 and the 2020 Instruction have been repealed. The Ministry issues the licence. Freight subcategory 49.41.00 covers carriage by vehicles with a gross weight of 3.5 tonnes or more, excluding dangerous goods (paragraph 14). Paragraph 16 provides for a three-year licence, reducible to one year; that reduction conflicts with the law following the amendment of 11 April 2026 (see below). Applications are considered within 20 calendar days, with checks by the licensing commission (paragraphs 23–24). Licensed vehicles require registration documents and a valid technical inspection; drivers require the appropriate licence category; legal entities require facilities, equipment and qualified staff (paragraphs 29–30). Each vehicle is entered in the unified register and issued a certificate (paragraph 31). The register procedure was approved by Order No. 3-iş of 8 January 2026 (registration No. 1924).

CONFLICTING PROVISIONS

Regulation No. 1629 predates Law No. 203-VII of 11 April 2026 amending the Law on Licensing Certain Types of Activity. It allows a licence term to be reduced to one year (paragraph 16) and five working days for issue after submission of proof of payment of the state fee (paragraph 26). The current law requires at least three years for the relevant business activity (Article 12(1)(2); paragraph 2 repealed) and issue within three working days after submission of that document (Article 14(6)). The text published by the Ministry retains both provisions. In our assessment, the statute takes precedence; confirm the procedure applied by the Ministry. The Regulation does not expressly address a foreign carrier making a single international journey under a transport permit.

The procedure for checking vehicles' compliance with regulatory requirements and international treaties (Order No. 27-Ö of 5 March 2015, registration No. 847, amended in 2022 and 2024) provides for a certificate of conformity. It does not expressly address foreign transit vehicles; request it alongside a local contractor's licence.

Dangerous goods

Turkmenistan is not listed as a party to the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) in the UN depositary's records as at 18 November 2026. Dangerous goods are carried under the national Road Carriage of Dangerous Goods Rules (Resolution No. 881 of 31 July 2018). Routes require approval by the internal affairs authorities, with documents submitted at least 10 days before carriage (paragraphs 54–59). The carrier obtains a safety certificate under the Türkmenstandartlary procedure, confirming that the

activity meets occupational safety requirements; the activity is also licensed. A foreign driver's and vehicle's ADR documentation may supplement the package but does not replace national requirements.

CHAPTER 05

Rail transport

The Railway Transport Law addresses the tariff framework (Article 12), contracts, carriage documents and consignment types (Articles 20 and 22), safety (Articles 26–29) and international cooperation (Article 37). Domestic tariffs, additional service charges and international tariffs are set by different bodies on different legal bases. Users are entitled to information on services, prices and conditions (Article 20(4)).

The Agreement on International Goods Transport by Rail (SMGS) is the principal instrument for international rail freight. Turkmenistan is named as a participant in the OSJD text as at 1 July 2026. OSJD regularly publishes amendments to SMGS and its annexes, including those effective from 28 October, 6 and 15 November 2026. Check the version applicable at dispatch.

The Railway Transport Rules (Order No. 72-iş of 13 October 2022, registration No. 1662) largely concern passengers and baggage. Demirýollary OJSC's freight section links to tariff documents and offers quotations. Request the current Charter, applicable tariff and additional charges from the operator. Reports of 20–50% discounts for carriage through Turkmenbashi Port relate to 2024; agree their application to the shipment separately.

Sidings and project cargo

Where goods arrive at a customer's or contractor's siding, the Procedure for Transferring Trains between Non-public and Public Railway Tracks applies (Order No. 07-iş of 7 January 2021, registration No. 1441). It covers checks on the technical readiness of the train and locomotive crew at handover and is binding on infrastructure owners, siding owners and railway personnel.

PRACTICAL TAKEAWAY

For project cargo, obtain advance confirmation from the railway of the receiving station, loading gauge approval, loading and securing plans, escort requirements, bogie exchange or transshipment arrangements at the Iranian border, and tariff components. These conditions are set by the carrier and should be recorded in writing before dispatch.

CHAPTER 06

The Caspian: shipping, ferries and Turkmenbashi Port

The port and port dues

The Merchant Shipping Code defines the status, functions and liability of seaports (Articles 66–79). The State Service for Maritime and River Transport approves the Rules for Use of a Commercial Seaport and Port Navigation Rules, binding on all port users (Article 66(3)). Decisions of the port director and orders of the harbour master within their respective powers bind all vessels, organisations and individuals in the port (Articles 72(2) and 74(4)). The harbour master acts under the Regulation approved by Service Order No. 64/DG of 4 May 2011. Request the current rules and mandatory directions from the port.

The port handles vessels in order of arrival, with liner vessels served according to their published schedules (Article 69). National maritime carriers enjoy statutory priority on entry and departure and concessions on port dues (Article 6^{1}). The port is liable for loss, shortage, deterioration, damage and delayed release of cargo from taking it into custody until delivery to the consignee (Article 70). Document cargo receipt and handover at the port in signed records.

The Code lists twelve earmarked port dues: vessel, berth, anchorage, channel, navigation, cargo, port supervision, sanitary, towage, pilotage, firefighting and mooring dues. The Service sets their amounts (Article 73). Distinguish these from freight, stevedoring, warehousing and other contractual services, which have different legal bases and recipients.

The harbour master may refuse departure, including for unpaid dues or directions from customs, border, sanitary or other authorities (Article 77). On application by a person claiming for salvage, collision, damage to port facilities or other harm, the port administration may detain a vessel and cargo pending security. The order lasts 72 hours, excluding non-working days, unless a court orders arrest within that period (Article 78). A ferry schedule therefore does not itself guarantee cargo release by a particular time.

Customs clearance of internationally trading vessels, goods and vehicles at the port is governed by the joint Order of the State Customs Service and Türkmendeňizderýaýollary Agency of 8 July 2021 (registration No. 1497). A joint team of customs, sanitary and border services carries out controls. The port administration schedules processing by the time of arrival notification and supplies advance electronic vessel and cargo information to customs. Bills of lading and cargo manifests are submitted in four originals. Vehicles and trailers arriving by ferry require vehicle entry/exit declarations and, for transit, a transit declaration. Foreign crew members may go ashore on passes issued by the State Migration Service (Order No. 74-iş of 3 July 2018).

According to the port, its customs warehouse, approximately 10,000 m^2, permits imported goods to be stored under customs control for up to three years without payment of duties and taxes. In June 2026, TRACECA's Secretary General estimated port utilisation at 25–30% of capacity, identifying visas and carrier permits as the main obstacles. Before dispatch, request the required documents, current rules, tariffs and vehicle/trailer storage conditions from the port.

Contract of carriage by sea

The Code provides for contracts of carriage of goods by sea, including under a charterparty, and documentary evidence of the contract: a bill of lading, charterparty or sea waybill (Articles 104–105). Dangerous cargo is subject to special rules (Article 139). Carrier liability is limited, subject to Article 158(1), to the higher of 666.67 units of account per package or shipping unit and 2 units of account per kilogram of gross weight. Paragraphs 4–5 address container packages and contractual increases in the limit (Articles 157–160).

Turkmenistan is a party to major IMO conventions: SOLAS; MARPOL with its 1997 Protocol; the Load Lines Convention with the 1988 Protocol effective from 3 September 2025; the Tonnage Measurement Convention; and the civil liability conventions for oil and bunker pollution. These concern vessels and pollution, rather than carrier liability for cargo.

Ferries: which regime applies?

For ferry carriage, identify the contractual subject: a laden truck, a railway wagon or the goods themselves. Under CMR Article 2, if a laden road vehicle travels part of the route by another mode without unloading the goods, CMR continues to apply to the whole carriage, subject to an exception for damage arising solely on the sea leg. Application of SMGS to wagons on ferries depends on the particular service. The term "ferry" alone does not determine the liability regime.

> **PLEASE NOTE**
>
> The port's December 2023 storage table gives 60 free days for transit containers, while tank containers are charged from day one. The port also announced new tariffs from 1 March 2024. Request written confirmation of these terms and a quotation for the handling date at tisp.marketing@port.com.tm; confirm schedules and freight rates with the ferry operator.

CHAPTER 07

Air freight

The Air Code identifies the air waybill as the freight carriage document (Article 92), regulates delivery and release (Article 93), foreign carrier operations (Article 95) and dangerous goods (Article 99). Following the 2025 amendments, the civil aviation authority is the Türkmenhowaýollary State Service (Article 7(2)).

Turkmenistan is a party to the Chicago Convention (since 14 April 1993) and the 1929 Warsaw Convention (since 20 March 1995). Mejlis Resolution No. 641-V of 4 November 2017 approved accession to the 1999 Montreal Convention, but the instrument was deposited with ICAO only on 18 March 2026. The Convention has applied to Turkmenistan since 17 May 2026. For carriage within its scope, the cargo liability limit has been 26 SDR per kilogram since 28 December 2024, unless the consignor makes a special declaration of interest in delivery.

PRACTICAL TAKEAWAY

The Warsaw regime may apply to air carriage begun before 17 May 2026 or involving a country not applying the Montreal Convention. A carrier's liability limit is not the insured value: insure high-value cargo separately.

CHAPTER 08

Freight forwarding and licences

Forwarding contracts under the new CC

Chapter XVII of the CC (Articles 784–797) governs freight forwarding. The forwarder undertakes, at the customer's expense, to perform acts or services connected with carriage; the customer pays the agreed remuneration (Article 784(1)). The rules on mandate contracts apply subsidiarily (Article 784(2)). The forwarder must dispatch goods in good faith, select those involved in carriage, protect the customer's interests and follow its instructions (Article 785). The customer must provide timely cargo information and instructions for carriage and customs documents and disclose any dangerous characteristics (Article 786).

PLEASE NOTE

The Turkmen and Russian texts of Article 784(1) differ. In Turkmen, the forwarder acts "buýrujynyň adyndan" — in the customer's name; in Russian, "in its own name". In our assessment, the Turkmen text is closer to a mandate (referred to in paragraph 2), the Russian text to a commission arrangement.

This affects who contracts with the carrier and who may bring claims against it. Specify in the contract in whose name the forwarder contracts for carriage and who holds claims against the carrier.

Unless otherwise agreed, a forwarder may carry the goods itself and then also acquires the rights and duties of a carrier (Article 793). It is generally liable for non-performance where it or its assistants are at fault (Article 794). Articles 795–796 address harm caused by third parties and the consequences of intent and gross negligence.

The forwarder must insure cargo only on the customer's instructions; if no special insurance terms are specified, it insures on ordinary terms (Article 788). Separately, it must, at the customer's expense, insure against harm its actions may cause the customer in performing the

order, unless the customer expressly declines in writing, and inform the customer with whom the cover was placed (Article 789).

Licences

The Licensing Law lists dangerous goods carriage, aviation, maritime and inland waterway activities, forwarding and road carriage as licensed activities (Article 22(1)(12), (14)–(17)). Following Law No. 203-VII of 11 April 2026, a licence must be issued within three working days of submission of proof of payment of the state fee (Article 14(6)).

Licensing authorities and subcategories are set by Resolution No. 1771 of 29 May 2020, last amended by No. 1871 of 20 June 2026. The Ministry of Automobile Transport licenses road forwarding; Türkmenhowaýollary licenses air forwarding; and the State Service for Maritime and River Transport licenses maritime forwarding. There is no single licence for all logistics services: a multimodal forwarder needs the relevant subcategories.

The Freight Forwarding Licensing Regulation (Resolution No. 81 of 29 April 2022) was aligned with the law by Resolution No. 1999 of 31 October 2026: the licence term is three years (paragraph 8), and issue is due within three working days after submission of proof of payment of the state fee (paragraph 17). The authority depends on the mode and activity subcategory. The changes are incorporated in the consolidated Turkmen text. As at 18 November 2026, the Ministry publishes Road Transport Regulation No. 1629 in its original wording (Chapter 4).

> **PRACTICAL TAKEAWAY**
>
> The forwarding contract should specify in whose name carriage contracts are made, the forwarder's licensed activities, documentation, insurance and claims arrangements. For SMGS rail carriage, take account of Article 46's restrictions on transfer of the right to claim; the forwarder's role as representative should be documented under SMGS. A general "logistics services" contract does not replace authorisations for individual operations.

CHAPTER 09

Transit through Turkmenistan

International road carriage, including transit, is governed by Turkmenistan's legislation and treaties (Road Transport Law, Article 27). Transport permits and customs procedures are separate requirements: compliance with one does not replace the other.

Carriers' duties towards customs

Under the Customs Code, the carrier presents the prescribed arrival documents (Article 40); after an accident or force majeure, it must safeguard goods and notify the nearest customs office immediately (Article 41). During internal customs transit, it must deliver the goods and documents to the destination customs office, preserve goods, seals and identification devices, and avoid unauthorised cargo operations (Article 53). Article 55 makes carriers and forwarders liable for non-delivery, and Article 114(2) extends these rules to customs transit. Issue No. 4 covers transit procedures and deadlines in detail.

TIR and GPS monitoring

Turkmenistan has been a party to the TIR Convention since 18 March 1997. TIR-EPD advance information is integrated with ASYCUDA World, and priority processing for TIR carnets has been announced. In July 2026, IRU and the State Customs Service reported the first successful eTIR movements: one from Azerbaijan through Turkmenbashi Port and Farap to Uzbekistan, and four from Turkmenistan across the Caspian to Alat. Pilot operations do not establish availability on every route. The 2011 voluntary TIR carrier liability insurance rules have not been repealed.

The procedure for monitoring international goods vehicles through geolocation was approved by State Customs Service Order No. 642 of 25 November 2016 (registration No. 1031). Foreign vehicles, laden or empty, are monitored from entry to exit customs. A customs officer installs the device in the cab or, if necessary, on the trailer or container. Vehicle, carrier, driver, route and cargo details are entered in the system and a control record is drawn up. Resolution No. 4746 sets a USD 10 service charge per foreign truck; for travel only to a border railway station, USD 3, 5 or 10 applies by payload (Appendix 1, paragraph 4). The USD 10 charge for a foreign trailer without a foreign tractor unit is included under Resolution No. 764.

PRACTICE

The driver should carry the second copy of the control record for exit customs and follow the declared route. Agree stops, overnight stays and route changes in advance: deviations may prompt customs checks and delay departure.

OUTSIDE THIS ISSUE'S SCOPE

The 1965 Convention on Transit Trade of Land-locked States has applied to Turkmenistan since 21 February 2025 (Law No. 129-VII of 30 November 2024). Its substantive provisions and exceptions are not analysed in detail here. Foreign companies routing goods through Iran or Russia must separately check applicable sanctions, export controls, payments and restrictions affecting carriers and banks under their own jurisdictions' laws. This issue does not replace that assessment.

CHAPTER 10

Project, heavy and oversized cargo

For oil and gas and infrastructure projects, this chapter is often particularly relevant: transformers, columns, modules and drilling equipment almost invariably exceed ordinary weight or dimensional limits.

Special permits

The Roads Law requires a special permit for heavy and oversized vehicles and provides for a road charge (Article 16). The travel procedure was approved by Resolution No. 13507 of 21 February 2014, amended in 2019 and 2022. Vehicles are classed as heavy or oversized where, among other criteria, gross weight exceeds 36 tonnes, height 4.0 metres or width 2.5 metres.

Axle limits depend on road category; permitted length depends on vehicle configuration (paragraph 4).

Internal affairs authorities issue a single-journey special permit for a defined route and period (paragraphs 5–6), with the route agreed by the State Agency for Management of Road Construction or its regional road administrations (paragraph 7). Since February 2026, the Agency's legal successor has been the Ministry of Automobile Roads. The charge does not discharge liability for road damage. Special works within the road reserve needed for passage, such as reinforcement, dismantling barriers or lifting cables, are at the road user's expense (paragraphs 10–12).

Prepare before dispatch

- a vehicle diagram showing axle loads, cargo weight and dimensions in transport configuration;
- a loading and securing calculation;
- a route identifying bridges, overpasses and crossings of power lines and utilities;
- escort arrangements and travel speed;
- authorisations for each mode along the route: railway loading gauge, port handling and ferry carriage.

This is a practical preparation list, not a statement that legislation requires every document in this form. Dangerous project cargo also requires compliance with the 2018 rules, safety certification and licensing (Chapter 4).

> **PRACTICAL TAKEAWAY**
> Allow time for route approvals and any road works. The carrier/customer contract should allocate responsibility for obtaining permits, paying road charges and damage to roads and utilities. Under the 2014 procedure, these costs fall on the road user.

CHAPTER 11

Liability, claims and cargo insurance

Carrier liability under the CC

The CC makes carriers liable for cargo loss, shortage, damage and delayed delivery, sets grounds for exemption and allocates the burden of proof (Articles 739–740). Article 745 governs compensation calculations. These rules apply to carriage not governed by an international convention or a special code.

Claims and time limits

If the consignee accepts goods without joint inspection and without general reservations to the carrier about shortage or damage, the goods are presumed, unless proved otherwise, to have arrived as described in the consignment note. Apparent defects must be notified on the day of receipt; concealed defects in writing within seven days of receipt (Article 751(1)). Compensation for delay may be claimed only if a written complaint is submitted within 21 days

of receipt (Article 751(3)). The limitation period for carriage claims is one year, or three years in cases of intent or gross negligence (Article 752).

> **PLEASE NOTE**
>
> Article 751(2) on joint inspection contains a negative in both language versions: evidence contradicting the inspection is admissible if the consignee "does not submit" a written complaint within seven days. The wording is open to more than one reading. The practical conclusion does not depend on interpretation: record defects on receipt, submit a written complaint within seven days and keep proof of dispatch.

International conventions and special codes set their own time limits, summarised in Appendix B. The main rules are:

- **CMR:** reservations for apparent damage on delivery; concealed damage within seven days, excluding Sundays and public holidays; delay within 21 days (Article 30). Limitation: one year, or three in special cases (Article 32). Liability limit: 8.33 SDR per kilogram under the 1978 Protocol;
- **SMGS:** claim consideration within 180 days (Article 46); limitation of two months for delivery delay and nine months for other grounds (Article 48);
- **Merchant Shipping Code:** written claim with supporting documents (Article 370); delay claim within 21 days (Article 371); response within 30 days (Article 372); one-year limitation (Article 373);
- **Air Code:** cargo damage complaints within 14 days (Article 129); consideration within three months (Article 130); actions within three years for domestic and two years for international carriage (Article 131).
- Montreal Convention (applicable to Turkmenistan since 17 May 2026): cargo damage complaints immediately after discovery and within 14 days of receipt; delay complaints within 21 days of the cargo being placed at the consignee's disposal (Article 31); actions within two years (Article 35).

Insurance

Cargo insurance and carrier or forwarder liability insurance are different products. Convention liability limits do not equal cargo value, so insure expensive equipment separately, naming the beneficiary and route. The insurance references in Articles 26 and 29 of the Road Transport Law are subject to the prescribed procedure and do not mean compulsory all-risks cover for every shipment. Separately, Resolution No. 4746 requires third-party civil liability insurance for a foreign truck's owner on entry: USD 100 for up to three months, unless the recognised international insurance document exemption applies. This does not insure the cargo.

PRACTICAL TAKEAWAY

Claims depend on evidence collected at delivery: consignment note reservations, packaging and seal condition, photographs, a record signed by the carrier, and dated written notices to the carrier and insurer. Time runs from receipt of the goods, not discovery of damage at the project site.

CHAPTER 12

Workflow: from booking to delivery

The sequence below applies to international project cargo shipments to Turkmenistan; the chapters referenced explain the legal conditions.

Stage	Action	Guide reference
1. Route and regime	Select route and mode; identify the applicable convention (CMR, SMGS, sea or air regime) and bilateral agreement	Chapters 2–3; App. A
2. Carrier and forwarder	Check licences, subcategories and vehicle registration; state in the forwarding contract in whose name carriage contracts are concluded	Chapters 4, 8
3. Permits	Obtain a journey permit for a foreign truck; a special permit and route approval for oversized cargo; approval 10 days in advance for dangerous goods	Chapters 4, 10
4. Payments	Calculate border, GPS, trailer, road and port charges; confirm current rates	Chapters 4, 6, 9
5. Documents	Consignment note (CMR, SMGS, bill of lading or air waybill), TIR carnet where used, permits and insurance policy; reconcile the cargo description with customs documents	Chapters 4–7, 9
6. Border and transit	Present documents, obtain the geolocation device and control record; follow the route and transit deadlines	Chapter 9; Issue No. 4
7. Cargo delivery	Joint inspection, consignment note reservations, written notice to the carrier and insurer; time limits depend on the applicable regime (Chapter 11; App. B)	Chapter 11; App. B

Scenario A. A transformer from Europe by road across the Caspian

A German supplier ships a 60-tonne transformer on a low-loader through Azerbaijan and the Alat–Turkmenbashi ferry. Before dispatch, the forwarder confirms ferry loading capability and timing, obtains permits for each route section and, through a local partner, a special permit from the port to the site coordinated with the road authority. Where the vehicle travels by sea without unloading the goods, CMR Article 2 applies to the combined route, subject to the sea-leg exceptions. Cargo cover is separate from carrier liability cover. Establish the actual carrier's registration country and availability of Turkmen permits before contracting; a European supplier's involvement does not itself entitle its carrier to enter.

Scenario B. Containers from China by rail

Pipe fittings travel in containers under SMGS through Kazakhstan. The forwarder checks the amendments applicable at dispatch and the destination station's requirements. If containers are unloaded onto the contractor's siding, train handover is agreed in advance under the 2021 procedure. The railway may take up to 180 days to consider a shortage claim; budget for that period.

Scenario C. An Iranian semi-trailer with a local tractor unit

Goods from an Iranian port arrive on an Iranian semi-trailer. At the border, a licensed carrier's Turkmen tractor unit takes over under a forwarding contract; the semi-trailer owner pays USD 150 for entry under Resolution No. 764. Before dispatch, the parties check rates, the local carrier's licence and tractor registration, and allocate cargo responsibility by leg in the contract. Routing through Iran also requires checks on applicable sanctions and banking restrictions.

APPENDIX A

Turkmenistan's international transport treaties

"International dates" are depositary data. Domestic ratification or accession and entry into force for Turkmenistan may be months or years apart.

Treaty	Domestic instrument	Status for Turkmenistan
Convention on the Contract for the International Carriage of Goods by Road (CMR), 1956	Mejlis Resolution No. 134-I of 18 June 1996	Accession: 18 September 1996; effective: 17 December 1996
CMR Protocol, 1978	—	Effective: 17 December 1996; limit: 8.33 SDR/kg
Additional Protocol to CMR concerning the Electronic Consignment Note (e-CMR), 2008	Law No. 510-VI of 20 November 2022	Effective: 21 March 2023
TIR Convention, 1975	Mejlis Resolution No. 135-I of 18 June 1996	Effective: 18 March 1997
AETR, 1970	Mejlis Resolution No. 136-I of 18 June 1996	Effective: 17 March 1997
ADR, 1957	—	Not listed as a party by the UN as at 18 November 2026
SMGS	—	Turkmenistan is listed in the OSJD text as at 1 July 2026
Montreal Convention, 1999	Mejlis Resolution No. 641-V of 4 November 2017	Instrument deposited: 18 March 2026; effective: 17 May 2026
Warsaw Convention, 1929	—	Effective: 20 March 1995
Chicago Convention, 1944	—	Effective: 14 April 1993
SOLAS, 1974	Resolution No. 229-III of 23 October 2008	Effective: 4 May 2009
MARPOL 73/78; 1997 Protocol	No. 228-III; No. 119-V	From 4 May 2009; Protocol from 20 February 2015
Load Lines Convention, 1966; 1988 Protocol	No. 224-III; Law No. 152-VII	From 4 May 2009; Protocol from 3 September 2025
CLC 1969 and 1992 Protocol; Bunkers Convention 2001	No. 225-III; Law No. 70-VII	CLC from 20 December 2009; Protocol from 21 September 2010; Bunkers from 23 April 2024
Convention on Transit Trade of Land-locked States, 1965	Law No. 129-VII of 30 November 2024	Effective: 21 February 2025

Treaty	Domestic instrument	Status for Turkmenistan
Ashgabat Agreement, 2011	Mejlis Resolution No. 203-IV of 21 May 2011	Ratified; in force since 2016. Qatar withdrew in 2013; Kazakhstan, Pakistan and India acceded. Kyrgyzstan approved accession in 2024; Armenia in 2025, with a Constitutional Court decision on 24 February 2026. Check participation dates with the depositary, Turkmenistan
Lapis Lazuli Agreement, 2017	Mejlis Resolution No. 674-V of 25 November 2017	Ratified
TRACECA Basic Agreement, 1998	Law No. 58-VII of 30 September 2023	Accession on 14 November 2023 (Ministry of Foreign Affairs of Turkmenistan)
ESCAP Agreements on the Asian Highway Network and Trans-Asian Railway Network	Mejlis Resolutions Nos. 444-V and 445-V of 12 September 2016	Accession: 27 November 2016 (UN depositary)
Agreement on Dry Ports, 2013	Mejlis Resolution No. 464-V of 15 October 2016	Accession: 27 November 2016
International Convention on the Harmonization of Frontier Controls of Goods, 1982	—	Accession: 27 November 2016 (UN depositary)
European Agreement on Main International Railway Lines (AGC)	Mejlis Resolution No. 286-VI of 22 August 2020	Accession: 31 August 2020
Agreement between the Caspian littoral states on cooperation in transport (Aktau, 2018)	Mejlis Resolution No. 110-VI of 1 December 2018	Signed in Aktau on 12 August 2018; Kazakhstan's legal database records entry into force on 22 March 2021
Customs Convention on Containers; Convention on Customs Treatment of Pool Containers	Laws Nos. 382-VI and 383-VI of 5 June 2021	Accession: 14 June 2021 (UN depositary)

Bilateral agreements on international road transport

Country	Agreement and instrument	Provisions
China	Signed: 29 November 2023; Law No. 92-VII of 30 March 2024	Ratified; permit quotas from the Ministry of Automobile Transport
Mongolia	Signed: 12 October 2024; Law No. 128-VII of 30 November 2024	Ratified
Pakistan	Signed: 14 May 1996; Resolution No. 2772 of 19 August 1996	Approved

Country	Agreement and instrument	Provisions
Kazakhstan	Agreement of 27 February 1997	Kazakhstan's embassy records entry into force on 29 January 1999. The Protocol was signed on 10 October 2024; Kazakhstan's draft provides for permit-free bilateral, transit and third-country carriage. On 30 December 2025, Kazakhstan's Transport Ministry listed Turkmenistan under a permit-free regime, noting "agreement signed". Agree application to the journey with the authorities
Uzbekistan	Agreement of 16 January 1996	According to LexUZ, effective from 6 April 1998. In October 2024, the parties agreed to move to E-permit and reciprocal charges on equal terms
Belarus	Bilateral agreement	In March 2026 the parties agreed the allocation of permits for 2027 (according to Belarus's Ministry of Transport)
Türkiye	Signed on 2 May 1992	Approved by Turkish Law No. 4019
Russia, Iran, Afghanistan	—	Check terms and quotas with the Ministry of Automobile Transport

APPENDIX B

Claim and action time limits by mode

Regime	Notice of damage and delay	Consideration of claims	Limitation period
Civil Code (domestic carriage)	Apparent damage: on the day of acceptance; concealed damage: in writing within 7 days; delay: in writing within 21 days (Art. 751)	No time limit set	1 year; 3 years in cases of intent or gross negligence (Art. 752)
CMR	Apparent damage: on delivery; concealed damage: 7 days excluding Sundays and public holidays; delay: 21 days (Art. 30)	Suspends the limitation period until a reply is received (Art. 32)	1 year; 3 years in special cases (Art. 32)
SMGS	Under SMGS and the transport documents; the consignor/consignee may submit a claim; assignment of claims is not permitted (Art. 46)	180 days (Art. 46)	2 months for delay; 9 months on other grounds (Art. 48)
Merchant Shipping Code	Written claim with supporting documents (Art. 370); delay: 21 days (Art. 371)	30 days (Art. 372)	1 year (Art. 373)
Air Code	International carriage: cargo damage — 14 days; the 21-day provision is subject to the note below (Art. 129)	3 months; for combined carriage: 6 months (Art. 130)	3 years for domestic carriage; 2 years for international carriage (Art. 131)
Montreal Convention	Damage: immediately after discovery, no later than 14 days after receipt; delay: no later than 21 days after the cargo is placed at the consignee's disposal; in writing (Art. 31)	No time limit set	2 years from arrival, scheduled arrival or cessation of carriage (Art. 35)

PLEASE NOTE

Article 371 of the Merchant Shipping Code refers to Art. 372, although the one-year limitation period is in Art. 373; a delay claim is due within 21 days of receipt. In the Turkmen text of Air Code Art. 129(2), the 21-day provision follows wording about missing the "specified periods", rather than expressly addressing late delivery. In our assessment, it should not be treated as extending the 14-day cargo damage deadline. Where the Montreal Convention applies, its Art. 31 requires a delay complaint within 21 days of the cargo being placed at the consignee's disposal.

APPENDIX C

What to check before shipment

The publication date does not mean that every statement remains current on the date of reading. The table identifies statements that depend on the version of an instrument and matters to check before shipment.

Issue	Comment	Where to seek clarification
Road carriage licence (No. 1629)	Two discrepancies with the law following 11 April 2026: a term of up to one year versus a minimum of 3 years, and issue within 5 rather than 3 working days. The Regulation does not expressly address one-off foreign trips	Ministry of Automobile Transport
Charges for trailers without a foreign tractor unit	No. 764, para. 6: effective from 15 November 2023 with no end date; USD 150/100 within para. 1. Check the route and calculation conditions	Ministry of Automobile Transport; Türkmenulaggözegçilik
Resolution No. 930 of 5 October 2018	USD 150 above quota: para. 11 of Appendix 1 to No. 4746. For the 2019 procedure, request the legal basis and calculation from the Ministry	Ministry of Automobile Transport
GPS for foreign trucks	The basic rate and exceptions for border stations are set by Resolution No. 4746; check the current version for the trip	Türkmenulaggözegçilik; Customs
Term and procedure for issuing a freight forwarding licence	Amendment No. 1999 of 31 October 2026: three years, three working days after submission of proof of payment. Confirm the authority and required documents for the relevant subcategory	Licensing authority for the relevant mode of transport
Freight forwarding contract model (Civil Code, Art. 784)	The Turkmen and Russian texts differ	Specify the arrangement in the contract; in a dispute, consult a qualified lawyer
Railway Charter and freight tariffs	The freight website links to tariff documents and offers quotations. Obtain the current Charter, tariff and additional charges from the operator	Ministry of Railway Transport

Issue	Comment	Where to seek clarification
Turkmenbashi Port rules and tariffs	Storage table dated December 2023; new tariffs were announced from 1 March 2024. Request the applicable version, rules and quotation for the handling date	Port: tisp.marketing@port.com.tm
Current version of SMGS	OSJD publishes amendments, including those effective from 28 October, 6 and 15 November 2026; check the version at dispatch	OSJD; railway
Ashgabat Agreement; INSTC; TITR	Ashgabat: Armenia's Constitutional Court decision of 24 February 2026; check Armenian and Kyrgyz participation dates with the depositary. INSTC: India's 2025 and 2026 MEA briefs differ. TITR: no Turkmen organisation in the membership lists	Ministry of Foreign Affairs; depositaries
Loading by a foreign carrier in Turkmenistan	Türkmenulaggözegçilik officially offers permits for loading and third-country carriage. Confirm the documents and conditions for the journey	Türkmenulaggözegçilik; Ministry of Automobile Transport
Applicability of the vehicle register and Procedure No. 27-Ö to foreign carriers	The texts do not expressly address this	Ministry of Automobile Transport
2018 Caspian transport agreement	Ratified by Turkmenistan (No. 110-VI); in force from 22 March 2021 (per Kazakhstan's legal database)	Ministry of Foreign Affairs of Turkmenistan
Fuel remaining on exit (2026)	Resolution No. 1917 of 5 August 2026: from 10 August 2026, a 150-litre limit, with TMT 30/litre on the excess (per the Latvian authority and media). Request the act and payment rules from customs	State Customs Service; Türkmenulaggözegçilik; border authority
Protocol with Kazakhstan of 10 October 2024	The draft covers bilateral, transit and third-country carriage. Kazakhstan's Transport Ministry listed a permit-free regime on 30 December 2025; agree its application to the journey	Transport authorities of Kazakhstan and Turkmenistan
Quotas for Russia, Iran and Afghanistan; Serakhs crossing	Current bilateral terms, quotas/balances and permit types are needed; for Serakhs, road and rail operating procedures and opening hours	Ministry of Automobile Transport; State Customs Service; railway
Foreign drivers: visas and registration	Stays of up to 15 days: electronic border registration (Art. 12(6)(3)). Order No. 102-iş provides no separate e-DR category; arrange the DR visa with the consulate	Migration Service; consulate

APPENDIX D

Questions for carriers and forwarders before dispatch

Issue	Why it matters
Which convention applies to the carriage, and to which leg?	It determines liability limits, claim time limits and documents
In whose name does the forwarder enter into contracts of carriage?	Who is party to the contract with the carrier and who may bring claims (Civil Code, Art. 784)
Which licences and subcategories do the carrier and forwarder hold? Are the vehicles entered in the register?	Providing the service without a licence for the relevant mode of transport is a violation; the register has been mandatory for licensees since 2026
Who obtains the permit, and is there a quota for the country of registration?	An additional charge of USD 150 applies above the exchanged permit quota
Which GPS, fuel and insurance charges are included in the price?	Entry and exit rates and limits have different legal bases; a trip cost calculation is needed
Who pays for the special permit, road charges and damage to roads?	Under the 2014 Procedure, the road user bears these costs
Is the cargo insured, for what amount, and in whose favour?	The carrier's liability limit is not the same as the cargo's value
Who inspects the cargo on delivery, and how?	Claim time limits run from acceptance of the cargo
What if the trip is delayed and the driver's visa expires?	Demurrage, storage, visa extension and other costs should be agreed in advance

Allocation of responsibilities

Task	Consignor / customer	Forwarder	Carrier
Cargo information, hazards and instructions	Provides (Civil Code, Art. 786)	Requests and checks	Receives via the consignment note
Choice of carrier and route	Agrees	Selects with due care (Civil Code, Art. 785)	—
Journey permits and special permits	Provides information	Arranges under the contract	Obtains permits for its vehicles
Customs documents	Provides	Prepares on instruction	Delivers and presents (Customs Code, Arts. 40, 53)
Cargo insurance	Gives instructions	Insures on instruction (Civil Code, Art. 788)	—
Cargo safety in transit	—	Liable where at fault (Civil Code, Art. 794)	Liable under the Civil Code or convention
Claim	Submits if entitled	Assists with the claim	Considers

The matrix allocates operational tasks; liability is determined by the applicable convention, the Civil Code and the contract.

APPENDIX E

Terms and abbreviations

Abbreviation	Meaning
CC	Civil Code of Turkmenistan 2025 (in force from 1 January 2026)
Customs Code	Customs Code of Turkmenistan
MSC	Merchant Shipping Code of Turkmenistan
CMR	Convention on the Contract for the International Carriage of Goods by Road, 1956
e-CMR	Additional Protocol to CMR concerning the Electronic Consignment Note, 2008
TIR	Customs Convention on the International Transport of Goods under Cover of TIR Carnets, 1975
AETR	European Agreement concerning the Work of Crews of Vehicles Engaged in International Road Transport
ADR	European Agreement concerning the International Carriage of Dangerous Goods by Road
SMGS	Agreement on International Goods Transport by Rail
OSJD	Organisation for Co-operation between Railways
ICAO, IMO	International Civil Aviation Organization; International Maritime Organization
TRACECA	Transport Corridor Europe–Caucasus–Asia
TITR	Trans-Caspian International Transport Route
SDR	IMF Special Drawing Rights: the unit of account for liability limits
TEU	Twenty-foot equivalent unit
Heavy and oversized vehicles	Vehicles exceeding the weight or dimensional limits in para. 4 of the 2014 Procedure

APPENDIX F

Source status

Source status as at 18 November 2026. The baseline comprises published instruments and materials collected by 1 November; the repeat review on 18 November covers the principal national provisions in Turkmen and accessible international sources. Treaty dates follow depositaries and specialist organisations; reports of practice are attributed. Apply the provisions and conditions effective on the shipment date.

Instrument	Latest amendments	Provisions used
Civil Code No. 162-VII of 28 June 2025; Law bringing the Code into force	Not specified	Arts. 721–761, 784–797
Law No. 28-VI of 9 June 2018 on the Fundamentals of Transport Policy	Not specified	Arts. 1–8, 13–15

Instrument	Latest amendments	Provisions used
Law No. 377-IV of 2 March 2013 on Road Transport	22 November 2025, No. 184-VII	Arts. 2, 4, 23–30
Law No. 376-IV of 2 March 2013 on Automobile Roads and Road Activities	11 April 2026, No. 203-VII	Arts. 6–8, 15–18
Law No. 186-V of 28 February 2015 on Railway Transport	24 July 2022, No. 501-VI	Arts. 7–9, 12, 17, 19–22, 26–29, 37–40
Merchant Shipping Code No. 222-III of 23 October 2008	22 November 2025, No. 184-VII	Arts. 6^1, 66–79, 104–105, 139, 154–160, 370–373
Air Code No. 255-IV of 10 January 2012	22 November 2025, No. 184-VII	Arts. 7, 92–99, 119–120, 126–131
Customs Code No. 137-IV of 25 September 2010	28 June 2025	Arts. 39–41, 53, 55, 114
Law on Licensing Certain Types of Activity	11 April 2026, No. 203-VII	Arts. 12, 14, 22
Decrees No. PP-546 of 11 July 2025 and No. PP-623 of 13 February 2026	—	Reorganisation of authorities
Resolution No. 1771 of 29 May 2020: licensing authorities	20 June 2026, No. 1871	Freight forwarding subcategories
Resolution No. 81 of 29 April 2022: freight forwarding licensing	31 October 2026, No. 1999	Paras. 3–20 (paras. 8, 17 as amended by No. 1999)
Resolution No. 11350 of 20 November 2010	Repealed (Resolution No. 1629 of 27 December 2025)	Repeal notation
Order No. 41-Ö of 3 April 2013: permits for foreign carriers	8 November 2024, No. 53-iş	Paras. 2–4, 14, 21–28
Resolution No. 14681 of 1 April 2016: rules for road carriage of goods	6 November 2023, No. 764	Paras. 9, 14, 18, 25–40
Resolution No. 4746 of 7 July 2000: unified charges	14 September 2022, No. 257	Appendices 1–2: charges, insurance, GPS, fuel and collection procedure
Joint Order of 28 August 2019: additional charge	Not specified	Paras. 4–7
Resolution No. 1981 of 3 November 2020: trailer charges	Time-limited instrument	Appendix
Resolution No. 764 of 6 November 2023: trailer charges	No expiry date specified	Paras. 1–7, Appendices 1–2
Resolution No. 1629 of 27 December 2025: road carriage licensing	—	Paras. 3–31, Appendix
Resolution No. 293 of 20 October 2022: trailer charges	Time-limited instrument	Para. 1
Order No. 59-iş of 24 December 2024: trailers with local tractor units	Not specified	Paras. 1–6
State Customs Service Order No. 642 of 25 November 2016: GPS monitoring	—	Sections I–III

Instrument	Latest amendments	Provisions used
Order No. 27-Ö of 5 March 2015: vehicle conformity checks	1 March 2024, No. 14-iş	General provisions
Order No. 3-iş of 8 January 2026: vehicle register	Not specified	Paras. 2–12
Order No. 4-iş of 14 January 2026: repeal of the 2020 Instruction	—	Para. 1
Resolution No. 13507 of 21 February 2014: heavy vehicles	30 September 2022, No. 277	Paras. 4–13
Resolution No. 881 of 31 July 2018: dangerous goods	4 June 2020, No. 1788	Paras. 4–5, 54–59, 87
Türkmenstandartlary Order No. 1/258 of 27 December 2014: safety certificates	11 February 2025, No. 32-iş	Subject matter
Order No. 72-iş of 13 October 2022: railway transport rules	Not specified	Para. 19, Chapters III–IV
Order No. 07-iş of 7 January 2021: handover of trains	Not specified	General provisions
State Insurance Organisation Order No. 76 of 3 October 2011: carrier liability insurance	Not specified	General provisions, para. 34
State Migration Service Order No. 4 of 9 January 2016: entry and stay of drivers	Not specified	Route, registration and receiving party
Law No. 290-IV of 31 March 2012 on Migration; State Migration Service Order No. 102-iş of 17 September 2026	11 April 2026	Art. 12(6)(3); electronic visa categories
Order No. 64/DG of 4 May 2011 of the Maritime and River Transport Service: harbour master	11 October 2016, No. 142/DG	General provisions
State Migration Service Order No. 74-iş of 3 July 2018: shore leave for crews	Not specified	Subject matter
Resolution No. 1917 of 5 August 2026: fuel remaining on exit	Per the Latvian authority and media	150 litres; TMT 30/litre
Joint Order of 8 July 2021: customs procedures at the port	Registration No. 1497	Clearance of vessels and cargo

International and official sources

- Ministry of Automobile Transport: documents (Nos. 1629, 764, 257); State Customs Service: electronic TIR (July 2026).
- UN Treaty Collection (UNTC): CMR, 1978 Protocol, e-CMR, TIR, AETR, ADR; dry ports and AGC
- ICAO: status of the Montreal Convention and liability limits; IMO: Status of Treaties 2026
- OSJD: SMGS (version as at 1 July 2026) and amendments; Railfreight (17 July 2023): approval of Turkmenistan's accession to INSTC; IDSA: parties to the Ashgabat Agreement
- UN Treaty Collection: Asian Highways, Trans-Asian Railway Network, 1982 Convention, Containers Convention
- PRIME (11 July 2023): Russia's consent to Turkmenistan's accession to INSTC; India's MEA briefs (February 2025, June 2026); Ata Watan (9 September 2024): parties to the Ashgabat Agreement

- Trend (28 March 2026): Belarus–Turkmenistan permits for 2027; Kun.uz (31 October 2024): electronic permits with Uzbekistan
- Turkmenbashi Port: new tariffs (29 February 2024); Latvian Road Transport Administration: diesel fuel limit (10 August 2026); Turkmenbashi Port: rate system (15 December 2023); Chronicles of Turkmenistan: fuel limit (11 August 2026)
- IRU: eTIR operations (27 July 2026); amendments to the Law on Migration (11 April 2026); Migration Service: e-Visa launch from 1 October 2026; Embassy of Turkmenistan in Türkiye: DR visa; Kazakhstan's legal database: Caspian transport agreement.

STATUS OF SOURCES

National provisions were compared with available official Turkmen texts and ministry documents. Points to check before a particular shipment are collected in Appendix C. International statuses were checked against depositaries and specialist organisations; reports of practice are accompanied by a date and source. This issue does not confirm the tariffs applicable on the date of a particular trip.

About Bilermen Hyzmatdashlar LLP

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