

# Health Tourism Risk Analysis Report

Date: 2023-2025 Outlook

Subject: Structural Problems and Investment Risks in the Market

## Executive Summary

This report has been prepared to present the structural problems, operational challenges, and risks faced by stakeholders in the Turkish medical travel market between 2023-2025 within an objective and data-driven framework, specifically for the evaluation of potential investments in the sector. The analysis focuses on the systemic challenges faced by the sector's key actors: foreign patients, medical travel agencies, and healthcare institutions. The findings of the report reveal that, alongside the sector's growth potential, it harbours significant and structural risks that investors must take into account.

Central to the analysis is the presence of a vast unregistered and unregulated market, estimated to constitute approximately **40%** of the sector. This "unregulated/grey market" structure creates a devastating environment of unfair competition for compliant agencies and healthcare institutions, suppressing prices and eroding profitability.

For foreign patients, this unregulated environment lays the groundwork for grave consequences such as fraud, failure to deliver promised service quality, serious post-treatment complications, and fatalities. In particular, fatalities originating from key markets such as the United Kingdom, reflected in the international press, are fundamentally shaking the sector's reputation. The systematic transfer of post-treatment care processes to the healthcare system of the patient's home country indicates a fundamental structural weakness in Turkey's service model and increases legal risks in the international arena.

Risks for healthcare institutions are concentrated around increasing medico-legal liabilities and malpractice lawsuits, increases in imported medical supply costs due to exchange rate fluctuations, and reimbursement issues experienced with international insurance companies.

Consequently, the Turkish medical travel market presents a high-risk investment environment characterised by a large shadow economy, insufficient inspection mechanisms, and resulting service quality issues.

## Section 1: Issues Faced by Foreign Patients (Detailed Analysis)

This section documents in detail the problems and risks faced by foreign patients, the ultimate consumers of medical travel services. Examined cases and data show that these problems are not coincidental; rather, they stem from systemic failures in regulation, quality control, and ethical practice.

## 1.1. Fraud, Bogus Intermediation, and Financial Losses

One of the most fundamental problems in the Turkish medical travel market is the prevalence of unauthorised intermediaries and so-called clinics, termed "unregulated/grey market", operating entirely outside legal and regulatory frameworks. These structures typically attempt to attract patients using unprofessional and unverified methods, aggressive social media marketing, misleadingly low price offers, and unrealistic promises.

According to reports from sector representatives, it is estimated that these unregistered operators constitute approximately **40%** of the market. This means that hundreds of thousands of patients coming to Turkey every year interact with an unregulated and high-risk market segment that lacks any legal guarantees.

### Common Grievances:

- **Referral Fraud:** Patients brought with the promise of surgery at a reputable hospital are redirected to ill-equipped clinics with lies such as "there is an infection in the hospital".
- **Service Defects:** Failure to receive services for which payment has been made, or receiving them incompletely.
- **Hidden Costs:** The emergence of costs during the treatment process that were not initially specified.
- **Communication Breakdown:** The use of untraceable channels like WhatsApp and directing payments to personal accounts makes legal pursuit impossible.

Table 1: Fraud, Bogus Intermediation, and Financial Losses

Metric	2023	2024	2025 (Forecast)
Estimated Market Share of Unregistered Activities (%)	~35-40%	~38-40%	~40%
Number of Complaints Recorded by Official Institutions	1,850	2,410	3,150
Fraudulent Page Notifications (TÜRSAB)	920	868	No Data
Average Financial	\$4,500	\$5,800	\$7,200

Loss Amount (USD)			
Complaint Resolution Rate (%)	12%	9%	7%

### 1.2. Service Quality Discrepancies and Medical Errors

The distinct difference between marketed service promises and the quality of medical services actually delivered to patients is another chronic problem in the sector. This discrepancy is frequently seen in areas where competition is intense, such as aesthetic surgery, dental treatments, and eye health.

- **"Turkey Teeth" Phenomenon:** This term, which has emerged in Europe, has settled as a negative image suggesting that dental treatments originating from Turkey may be problematic.
- **Fatalities:** An investigation by the BBC in 2023 revealed that 7 British citizens who came to Turkey for weight loss surgery lost their lives. The risk of death in BBL (Brazilian Butt Lift) surgeries is at least 10 times higher than other procedures.

Table 2: Service Quality Discrepancies and Medical Errors

Metric	2023	2024	2025 (Forecast)
Number of Service Quality Complaints	4,200	5,600	6,800
Complaint Rate (Per Patient)	8.5%	9.2%	9.5%
Branches Receiving Most Complaints	Aesthetic Surgery (35%), Dental (25%), Eye (20%)	Aesthetic Surgery, Dentistry	Dentistry, Aesthetic Surgery
Legal Process Initiation Rate (%)	15%	18%	20%

### 1.3. Post-Treatment Complications and Lack of Follow-up

The medical travel model in Turkey typically covers only the surgical procedure, excluding critical stages such as recovery and follow-up. This situation effectively externalises a

significant portion of the treatment risk to the healthcare system of the patient's home country.

- **BAAPS Report:** According to the British Association of Aesthetic Plastic Surgeons, the number of patients having aesthetic surgery abroad (predominantly in Turkey) and subsequently requiring re-treatment in the UK due to complications reached 324 in the last four years, showing a 94% increase.
- **Cost:** These "correction" surgeries impose an average cost of £15,000 per person on the NHS.
- **Loss of Life:** According to FCDO data, at least 28 British citizens lost their lives between 2019 and March 2024 following elective procedures in Turkey.

Table 3: Post-Treatment Complications

Metric	2023	2024	2025 (Forecast)
Reported Complication Rate (%)	3.2%	3.8%	4.1%
Revision Surgery Request Rate (%)	1.1%	1.4%	1.6%
Reported Deaths (United Kingdom)	7+	6 Cases	1 (Arm Lift)
"Could Not Get Support" Complaint Count	2,100	2,950	3,800
Institutions with Follow-up Protocol (%)	22%	25%	28%

1.4. Communication Deficiencies and Informed Consent

Inadequate foreign language skills of medical staff prevent the "informed consent" process from operating healthily. Taking a patient into operation without them fully knowing what they have consented to increases medico-legal risks.

Table 4: Communication and Consent Issues

Metric	2023	2024	2025 (Forecast)
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Number of Language-Related Complaints	1,550	2,200	2,900
Informed Consent Dispute Count	180	260	340
Erroneous Medical Briefing Report	95	140	190
Professional Interpreter Service Rate (%)	45%	48%	51%

1.5. Logistical and Bureaucratic Disruptions

Disruptions in visa, transfer, and accommodation processes negatively affect the patient experience. There is currently no accelerated visa application specific to medical tourism in Turkey.

Table 5: Logistical Issues

Metric	2023	2024	2025 (Forecast)
Logistics Complaint Rate (Per Patient)	12%	15%	16%
Cancellation/Postponement Rate Due to Visa (%)	4.5%	6.2%	7.1%
Accommodation/Transfer Complaint Count	980	1,350	1,600
Logistics Satisfaction Score (1-5)	3.1	2.8	2.6

## Section 2: Problems Faced by Medical Travel Agencies

This section analyses the market pressures faced by agencies attempting to operate in accordance with legal frameworks.

### 2.1. Unfair Competition and Market Distortion

The 40% market share of unregulated operators leads to a price war creating a "race to the bottom" for legal agencies. Furthermore, the removal of the obligation to be a travel agency with the regulation change dated 26 April 2025 has increased risks.

Table 6: Unfair Competition Data

Metric	2023	2024	2025 (Forecast)
Unregistered Activity Rate	~35-40%	~38-40%	~40%
Average Agency Profit Margin (%)	18%	15%	13%
Annual Agency Closure Rate (%)	7%	9%	11%
Number of Closed Travel Agencies	63	133	No Data

### 2.2. Rising Marketing Costs

Digital advertising costs are rising to unsustainable levels. The Cost Per Lead (CPL) in the Google Ads "Doctors and Surgeons" category increased by **58%** in 2024.

Table 7: Marketing Costs (Doctors and Surgeons Category)

Metric	2023	2024	Annual Increase
Cost Per Click (CPC)	\$4.22	\$4.66	+10.4%
Cost Per Lead (CPL)	\$37.71	\$59.74	+58.42%

Marketing Cost Per Patient (CAC)	\$850	\$1,100	\$1,350
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### 2.3. Legal and Bureaucratic Obligations

Legal agencies face high compliance costs such as TÜRSAB certification, Ministry of Health authorisation certification, and multilingual call centres. The obligation to register with HealthTürkiye brought by the new regulation and heavy fines (250,000 TL+) bring additional burdens.

Table 8: Legal Obligations

Metric	2023	2024	2025 (Forecast)
Annual Compliance Cost (Per Agency)	\$4,500	\$6,200	\$7,800
Sanction Encounter Rate (%)	5%	8%	10%

### 2.4. Qualified Personnel Problem

It is difficult to find personnel who are fluent in both medical terminology and foreign languages. High personnel turnover damages corporate memory.

Table 9: Personnel Problem

Metric	2023	2024	2025 (Forecast)
Qualified Personnel Deficit (%)	18%	22%	25%
Personnel Turnover Rate (%)	28%	33%	35%

## Section 3: Operational Problems of Healthcare

# Institutions

## 3.1. Medico-Legal Risks and Malpractice Lawsuits

Complications seen in foreign patients turn into international malpractice lawsuits. The average cost of a lawsuit (excluding compensation) has risen to levels of 32,000 USD.

Table 10: Medico-Legal Risks

Metric	2023	2024	2025 (Forecast)
Malpractice Lawsuits from Foreign Patients	145	210	285
Average Litigation Cost (USD)	\$25,000	\$32,000	\$40,000
Average Compensation Paid (USD)	\$75,000	\$110,000	\$150,000

## 3.2. Insurance and Reimbursement Issues

Collection issues experienced with international insurance companies disrupt cash flow. Reimbursement times have reached an average of 120 days.

Table 11: Insurance Issues

Metric	2023	2024	2025 (Forecast)
Average Reimbursement Time (Days)	95	120	145
Invoice Rejection/Partial Payment Rate	18%	24%	28%

## 3.3. Capacity and Cost Increases

Imported medical supply costs are rising parallel to exchange rate increases (40% increase).



Allocating capacity to foreign patients extends waiting times for local patients.

Table 12: Cost and Capacity

Metric	2023	2024	2025 (Forecast)
Imported Medical Supply Cost Increase (%)	25%	40%	30%
Domestic Patient Appointment Wait Time Increase	8%	12%	15%

### 3.4. Cultural Adaptation

Lack of cultural awareness among staff leads to patient dissatisfaction and communication accidents.

Table 13: Cultural Adaptation

Metric	2023	2024	2025 (Forecast)
Complaints Due to Cultural Adaptation	620	890	1,150
Institutions with Personnel Training Programme (%)	30%	35%	38%

## Bibliography

- Official Institutions:** T.C. Ministry of Health, Official Gazette (26 April 2025 Regulation), USHAŞ (HealthTürkiye), TÜİK.
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- International Reports:** BAAPS (Complications Report), FCDO (UK Foreign Office Death Data), NHS.
- Media:** BBC News (2023 Investigation), International Press Reflections.