REPUBLIC OF TÜRKİYE
MINISTRY OF TRADE
DIRECTORATE GENERAL FOR PRODUCT SAFETY AND INSPECTION

GUIDE ON IMPORT INSPECTION OF *CONSUMER PRODUCTS*

Handbook on Implementation Principles

2026

Inspection Unit: Regional Directorates of Customs and Foreign Trade, Ministry of Trade
Prepared by: Import Controls Department

Table of Contents

Contents

1. Scope and Basis

This Guide has been prepared to determine the procedures and principles for carrying out and concluding the inspection processes of products covered by the Import Inspection Communiqué for Consumer Products, prepared and implemented by the Ministry of Trade pursuant to Article 455 of Presidential Decree No. 1 on the Organization of the Presidency, the Product Safety and Technical Regulations Law No. 7223 dated 5/3/2020, the Decision on the Technical Regulations Regime put into effect by Presidential Decision No. 6038 dated 14/9/2022, and the Regulation on Technical Regulations in Foreign Trade published in the Official Gazette No. 32281 dated 16/8/2023.

With regard to matters not covered in the inspection guides, instructions issued as a result of company applications shall, unless otherwise specified, not be considered case-specific and shall also apply to other companies in the same situation.

The principles and provisions set out in this Guide shall not be understood or interpreted outside the scope of the legislation on Product Safety and Technical Regulations.

2. Import Inspection Applications

2.1 Application by the Importing Company

Import inspection applications for products covered by the "List of Products Subject to Inspection" in Annex-1 of the Communiqué are made prior to the registration of the customs declaration, within the framework of the fourth paragraph of Article 181 of the Customs Regulation.

The provision set out in Article 5 of the Communiqué shall apply to the application. Accordingly, the user authorized to act on behalf of the company submits the application through TAREKS by entering the data relating to the import consignment, using the "Access to E-Signature Applications" section under the "E-Signature Applications" section of the Ministry's website. Upon submission of the application, TAREKS assigns the company an application number solely for the purpose of tracking its transactions with the relevant inspection unit.

2.2 Exemptions and Exceptions

The types of applications granted exemption from and exception to import inspection are set out in Article 6 of the Communiqué. Accordingly, products accompanied by an A.TR certificate, returned goods, and products specified in Part Five of the Decision on the Implementation of Certain Articles of Customs Law No. 4458, annexed to Council of Ministers Decision No. 2009/15481 dated 9/9/2009, are exempt from inspection process.

However, pursuant to the last paragraph of Article 6 of the Communiqué, applications accompanied by an A.TR certificate may also be directed to the inspection process where deemed necessary as a result of the assessment. In such assessments, in addition to risk analysis, the results of the review of documents submitted in the company's previous applications, whether the company has submitted a document not issued by the relevant party, and whether it has submitted cancellation or duplicate applications are also taken into consideration.

2.3 Submission of Application Documents

For each application, the documents specified in Articles 1 and 2 of Annex-2 of the Communiqué must be uploaded to the system. For products directed to physical inspection, the documents specified in Articles 3 and 4 of Annex-2 of the Communiqué must be uploaded in full

to the Risk-Based Control System for Foreign Trade (TAREKS) electronically within twenty working days, including the day of application.

Where the documents in question are incomplete and the company wishes to proceed with the application, the system grants the company additional time. Where the required documents are not uploaded within the additional time granted, the application is concluded by the system as "Rejection: Missing Documents." Where an application concluded by the system as "Rejection: Missing Documents" due to missing documents specified in Annex-2 of the Communiqué is requested to be reopened for inspection, the application may be reopened once through the additional-time-request button available in the system.

Where the documents required to be uploaded for applications made by users through TAREKS that are directed to inspection process cannot be uploaded to the system due to a technical problem, the relevant documents are submitted in person to the relevant Regional Directorates. In the case of an in-person submission, the documents relating to the application may be delivered by persons authorized under a power of attorney. In this case, a power of attorney evidencing their authorization to carry out the relevant transactions on behalf of the importer must be submitted. Where no power of attorney is submitted, the inspection procedures will not be carried out.

In the application files submitted through TAREKS for an application relating to products covered by the same customs document, where:

- More than one HS code,
- Products of different types, origins, brands or models under the same HS code,
- Products with different manufacturers,

are included, it shall be sufficient to upload to TAREKS only once documents such as the customs document, invoice and declarations of conformity that are common to and applicable to each application file.

3. Inspection Processes

The inspection process begins when an application submitted through TAREKS by the user authorized to act on behalf of the company is referred for inspection. The import inspection process, referred to as the inspection process is carried out by covering some of the following steps, in the order listed below:

- Verification of TAREKS Application Information
- Scope Check
- Document Check
- Physical Inspection
- Laboratory Testing

First, the TAREKS application information is verified, followed by a scope check. Once it is established that the products fall within the scope of the relevant legislation, the information and documents relating to the product are examined within the framework of that legislation. As a result of the risk analysis carried out by TAREKS, products may be directed directly to laboratory testing.

Where the inspection units have reason to suspect that the products pose a risk, the products may be assessed at the next higher inspection stage.

3.1 Verification of Application Information

The consistency between the information declared in the TAREKS application and the documents submitted through TAREKS is checked by the relevant inspection unit. Where application information has been declared incorrectly, the application is cancelled by the inspection unit and a new application must be made through the system. However, where the brand and model have been inadvertently declared incorrectly in the system, the necessary corrections may be made through the system, in consultation with the relevant inspection unit, without cancelling the application.

3.2 Scope Check

In applications directed to the inspection process by TAREKS, it is checked whether the product, based on its corresponding HS Code, falls within the scope of the products targeted for inspection by the Ministry. Applications relating to products determined to be out of scope are concluded as "Out of Scope: Inspection Result."

Products declared as out of scope through TAREKS by the company representative are directed to physical inspection upon their first import. The import of products determined to be out of scope is concluded as "Out of Scope: Inspection Result." Whether products previously determined to be out of scope as a result of inspection are directed to physical inspection upon subsequent imports is determined according to risk analysis.

3.3 Verification of Application Documents

In order to determine the compliance of the products subject to the application with the applicable technical legislation, the information and documents submitted by the company are verified.

Documents are, in principle, to be submitted in Turkish. However, documents submitted in English are also accepted. Where deemed necessary, notarized translations of the documents may also be requested.

Test reports submitted by companies within the scope of the inspection must be up do date, issued by accredited laboratories, and dated prior to the transport document. The company that had the testing carried out must be the manufacturer or the importer of the product. Test reports must contain information identifying the products, such as brand and model/serial number. In order to establish a causal link between the product and the test report, the information on the products or their packaging must match the information in the test report during inspections. Where a causal link cannot be established between the product and the test report, and provided the company agrees, samples must be taken from the products and tested.

Photographs to be uploaded to the system within the scope of a TAREKS application must belong to the imported product and must have been taken within the customs-controlled area. Where it is determined during physical inspection that the photographs uploaded to the system are not of the same product, the matter is reported to the General Directorate. Where it is

determined that photographs have been uploaded to the system for the purpose of abusing the inspection procedures, the matter will be taken into account in TAREKS's risk assessment.

Where, as a result of the information and documents submitted at the time of application and the examinations carried out on the product, the need for a more detailed investigation arises, or where the documents and information submitted by the importer at the time of application do not belong to the product, the company shall be requested to complete the documents relating to the product within an additional period of 45 days, provided that it is considered that the company did not intend to mislead the inspection units. Where the requested documents are not submitted within the additional 45-day period, starting from the date on which the relevant inspector first requested a document through TAREKS, the application shall be concluded as "Rejection: Missing Documents." In the event of missing documents, applications shall not be concluded by the inspector through cancellation.

3.4 Physical Inspection

Where products are directed to physical inspection by the system, they may be subjected to physical inspection for the purposes of establishing a casual link between the products and the documents uploaded to the system and eliminating any doubts that may arise regarding products directed to document inspection. During physical inspection, it is essential to examine the products in terms of their structure and characteristics and to determine whether all required reports have been submitted or, for products for which a report cannot be submitted, which tests are to be requested. Details of the findings must be recorded in the Physical Inspection/Sampling Report set out in Annex-1.

In applications directed to physical inspection, persons accompanying the inspection and sampling carried out in the customs-controlled area are obliged to submit a power of attorney evidencing their authorization to carry out the relevant transactions on behalf of the importer. Where no power of attorney is submitted, the inspection procedures shall not be carried out.

For products to be subjected to physical inspection, all communications with the inspection unit must be conducted through the "Inspection Messages" tab. Where company representatives are not present or the products are not ready at the scheduled physical inspection time, the inspection schedule shall be rearranged without taking the application date into consideration. Where the products are not present at the inspection site, the application shall be concluded as "Rejection: Inspection Result."

During physical inspection, photographs of the product should, where possible, be taken and archived for use where necessary.

Products regarding which there is serious doubt as to their safety may be sent to a laboratory for testing, and action shall be taken according to the test result. Where the importing company does not accept the testing and instead requests that non-compliance be determined by petition, the application shall be concluded as "Rejection: Inspection Result." Where the importing company objects to the testing decision or to the decision to determine non-compliance by petition, the matter shall be reported to the General Directorate.

3.4.1 Warnings

During physical inspection, it must be checked whether the warnings required, under the legislation applicable to the product to be imported, to appear on the product or its packaging are present in the manner required by that legislation. Where warnings required to appear on the product under the applicable technical legislation are missing or incomplete, such warnings may be permitted to be added by handling in the customs-controlled area. (See: 4.4)

3.5 Testing Procedures

Where companies are unable to submit a test report, where inspectors have serious doubts regarding the products, or where products are directed directly to testing by TAREKS, the products are sent for testing, provided that the company agrees.

For applications sent for testing, samples are taken from the products by inspectors and sent for testing, provided that the shipping and testing costs are borne by the importer. Samples are sent by the relevant inspection unit to one of the designated laboratories, in sequence and on a rotating basis. Inspections are concluded according to the test result. The result of the sample taken shall apply to all items represented by that sample. It is essential to keep the number of samples to a minimum. The number of samples to be taken is determined according to the technical legislation applicable to the product, and additional samples may be taken where deemed necessary.

During sampling, the required information shall be recorded in the Physical Inspection/Sampling Report set out in Annex-1, and the report shall be signed by both the relevant inspector and the company's authorized representative. At this stage, the representative's power of attorney shall be checked, and photographs of the samples taken shall be taken by the inspection unit. The sample to be retained by the inspection unit shall be recorded in the sample register.

Counter-samples shall be kept at the Group Directorate. The period for objecting to test results is 15 working days. Where an objection is raised to the test results, counter-samples shall, where possible, be sent to a testing body different from the laboratory to which the products were initially sent, for retesting.

In files directed to testing by the system but which cannot be tested due to testing facilities, product characteristics, or the number of products, the process shall continue as a review of the test report. Such cases, together with the relevant HS Code and the reason why testing could not be carried out, shall be reported promptly to the General Directorate.

Where the importing company does not agree to the product being sent for testing, the application shall be concluded, based on the company's written declaration, as “Rejection: Inspection Result.”

For products subjected to testing, a test report demonstrating compliance with the applicable technical legislation shall be considered valid for one year and may be used for subsequent applications relating to the same products only within that one-year period.

3.5.1 Equivalent Products

In applications where a large number of items are directed to testing, or where no test report is available and it is deemed appropriate to send the products for testing, not all items are

sent for testing. Among products within the same application that have the same manufacturer, brand and importer, one reference product is selected for each color and material, regardless of differences in model, and sent for testing to represent the equivalent products.

Even where items in an application that may be considered equivalent to an item directed to testing have not themselves been directed to testing by the system, the applications shall not be concluded until the testing of the item directed to testing has been completed.

Where the reference product passes the test, all equivalent items shall be concluded through TAREKS as "Acceptance: Inspection Result." Where the reference product fails the test, the company has the right to object to the test result through the system within 15 working days. Where the company objects to the test result and the product passes a second test carried out solely in respect of the matter for which non-compliance was determined, all equivalent items shall be concluded through TAREKS as "Acceptance: Inspection Result."

Where the reference product fails the test and the company does not object to the test result, or where the company objects but the product also fails the second test, the reference product shall be concluded as "Rejection: Test Result." In this case, where requested by the company, all equivalent products may also be sent for testing. Applications for which the importing company requests an unfavorable conclusion without testing shall be concluded, based on a petition to be submitted, as "Rejection: Inspection Result."

3.6 Application Cancellation Procedures

Cancellation is a procedure that allows material error or errors identified during the review of an existing application to be corrected so that the application can be resubmitted. Applications under ongoing inspection may only be cancelled by the inspector.

Where one or more items of application information, other than the brand and model information, have been recorded in the system incorrectly or incompletely, a message explaining the matter shall be sent by the relevant inspection unit through the "Inspection Messages" tab, and the inspection process relating to the application shall be continued through to the final stage. Where it is established as a result of the inspection that the products cannot pass import inspection, the application shall be concluded as "Rejection"; in other cases, it shall be concluded as "Cancellation: Inspector's Cancellation" to enable the company to correct the error. The factual error in question must be indicated in the inspector's note when the application is closed. Where the brand and model have been inadvertently declared incorrectly in the system, the necessary corrections may be made by the company through the system, in consultation with the relevant inspection unit, without cancelling the application.

Where applications relating to products subjected to inspection by the inspection unit are cancelled due to material errors following completion of the inspection process, inspection procedures must be carried out for the same consignment according to the type of inspection assigned by TAREKS.

Where, during an ongoing inspection, a request is made for the products subject to inspection to be transferred to another company, the inspection procedures relating to the application shall continue to be carried out under the existing application. Where the products covered by the application are compliant, following the submission of documents evidencing the transfer, the

application of the transferring company shall be concluded as “Cancellation: Inspector's Cancellation.” Where any doubt arises regarding the transfer transaction, the matter must be reported to the General Directorate.

Other than the matters specified above, cancellation requests made by companies shall not be accepted. Requests for cancellation of an application on the grounds that the products are being returned to the country of origin or transited to another country shall not be accepted. However, the application may be concluded as “Rejection” based on a written petition submitted by the company stating that it requests the application to be concluded as “Rejection.”

3.7 Duplicate Applications

The making of a new application or opening of a new item through TAREKS in order to import products that are the subject of an application whose inspection has been concluded as “Rejection”, or in order to avoid inspection for products that are the subject of an application/application item under ongoing inspection, is referred to as a duplicate application. This practice prevents the risk analysis from operating effectively and correctly.

In order to prevent duplicate applications, the following matters must be observed with regard to inspection applications in which a factual error is identified in the application information:

- Once it is understood that the application in question needs to be cancelled, company representatives must be immediately informed by the relevant inspection unit, and the cancellation must be carried out following the inspection process,
- In the inspection message in question, and, where contact is made with the company representative, in any discussion held, it must be emphasized that a new application must not be made for the products subject to cancellation without first confirming through the system that the cancellation has been carried out, and that failure to do so may result in sanctions being applied to the company and the user.

In this context, where it is determined that companies have made a duplicate application, the inspections must be concluded directly as “Rejection: Misleading Transaction,” and the matter must be reported to the General Directorate.

3.8 Document Not Issued by the Relevant Party

Where the authenticity of a document submitted within the scope of import inspection is doubted the authenticity of the document shall be verified through the website of the issuing organization. Where this is not possible, the issuing organization is contacted by e-mail and the authenticity of the document is confirmed. Where the response received indicates that the documents are forged, or are not accurate, valid or consistent, the document in question will be treated as not having been issued by the relevant party. Where the information requested by e-mail from the relevant organization is not sent within 20 days, the matter is reported to the General Directorate.

Where it is understood that a document submitted to TAREKS was not issued by the relevant party, renewal of the document is not requested. The inspection is concluded directly as “Rejection: Document Not Issued by the Relevant Party,” and the matter is reported to the

General Directorate. Administrative sanctions will be applied to both the company and the user in this regard, pursuant to Article 13 of the Communiqué.

On the other hand, it is necessary that:

- If the original of the document exists on the website of the relevant organization, this is stated in the letter to be sent to the General Directorate,
- If contact is made with the relevant organization by e-mail and either the entire original document or its cover page is provided, it is submitted as an attachment to the letter reported to the General Directorate,
- If the correct document or its cover page cannot be obtained, this is stated in the letter addressed to the General Directorate.

Where it is understood that any falsification has been made in the information and documents submitted for one of the application items, or that a transaction whose authenticity is doubted has taken place, action is taken pursuant to the provisions above only for the item or items in doubt, and the inspection of the other item(s) is completed in accordance with the relevant technical legislation.

3.9 Attempts to Mislead the System

Attempts aimed at preventing the risk analysis from operating correctly are considered misleading transactions, as they are intended to mislead the system. Accordingly, where such attempts are detected, the application in question is concluded as “Rejection: Misleading Transaction.”

4. Finalization of the Inspection

4.1 Applications to be Concluded with Conditional Acceptance

Conditional Acceptance: Minor Deficiency

Unless otherwise specified in the technical legislation, where manufacturer or importer information that is required to be present with the product, or on the product/its packaging, cannot be established, the application is concluded as “Conditional Acceptance-Minor Deficiency: Inspection Result,” so as to enable it to be determined, through market surveillance and inspection activities, whether such deficiencies have been remedied.

Conditional Acceptance: Warning

Where the markings specified in the technical legislation applicable to the product are not affixed in accordance with the size specified in the relevant legislation, the inspection is concluded, on a one-time basis, as “Conditional Acceptance: Warning,” taking into account criteria such as the design, nature and dimensions of the product and the placement of its label, provided no other non-compliance is found as a result of the inspection. Where the situation subject to the warning recurs in a subsequent application, the application is concluded as “Rejection: Missing Marking.”

4.2 Applications to be Concluded with Rejection

Where a non-compliance of the relevant legislation is identified as a result of the inspection, the application is concluded as “Rejection: Inspection Result.” The reason for non-compliance must be recorded in detail as an inspector's note on the application and must also be

communicated to the user via the message set out in Annex-2. The matter is notified to the customs administration by a letter stating the reason for rejection, and the customs administrations do not permit the import of the product in question.

Where products need to be tested and the importing company does not accept that the products be tested and instead requests non-compliance by petition, the application will be concluded as "Rejection: Inspection Result."

In TAREKS applications, where companies have collectively entered information relating to more than one product (brand-model-quantity, etc.) within a single item, and it is understood that the application item includes both products that will be concluded as a rejection and products whose import may be permitted, a new TAREKS application is arranged to be made for the compliant products, and, once the new application has been made, the existing application is concluded as "Rejection: Inspection Result." A new TAREKS application may be made only for the products found compliant. Where it is understood that a new application has been made for non-compliant products, the relevant products will be processed in accordance with the principles applicable to duplicate applications. (See: 3.7)

In applications directed to physical inspection through TAREKS whose inspection process is ongoing, where it is determined that inspection has been avoided through unlawful means such as improper use of a TPS number or unauthorized transit trade, the application must be concluded as "Rejection: Misleading Transaction," taking into account the absence of the products subject to the application at customs and these avoidance actions, and the General Directorate must be informed urgently of the matter.

Where it is determined that the products are not present in the customs-controlled area at the time of inspection, for reasons such as an incomplete delivery of the order or the products not yet having reached the customs-controlled area, the relevant application item must be concluded as "Rejection: Inspection Result," since no determination or examination could be made regarding the products.

4.3 Compliance Inspection Results

No.	Inspection Result	Explanation
1)	Acceptance: Inspection Result	Where no non-compliance with the relevant technical legislation is identified as a result of physical inspection, the application is concluded as "Acceptance: Inspection Result."
2)	Out of Scope: Inspection Result	Where it is determined that products do not fall within the scope of the applicable technical legislation and/or, by virtue of their HS code, do not fall within the scope of products targeted for inspection, the application is concluded as "Out of Scope: Inspection Result."

No.	Inspection Result	Explanation
3)	Conditional Acceptance-Minor Deficiency: Inspection Result	Applications are concluded as "Conditional Acceptance-Minor Deficiency: Inspection Result" so that deficiencies identified during inspection are remedied immediately after completion of import procedures and, in any event, before being placed on the market.
4)	Conditional Acceptance-Warning: Inspection Result	Where the compliance markings required to appear on the product are not affixed in accordance with the applicable size, the application is concluded as "Conditional Acceptance-Warning: Inspection Result," provided no other non-compliance is found.
5)	Rejection: Inspection Result	Where non-compliance with the relevant legislation is identified as a result of the inspection, the application is concluded as "Rejection: Inspection Result."
6)	Rejection: Missing Documents	Where the documents requested during inspection are not submitted within the time granted, the inspection shall be concluded as "Rejection: Missing Documents."
7)	Rejection: Missing Marking	Where the compliance markings required under the relevant legislation are not present on the product, the application is concluded as "Rejection: Missing Marking."
8)	Rejection: Test Result	Applications sent for testing during inspections and whose test result is unfavorable are concluded as "Rejection: Test Result."
9)	Rejection: Document Not Issued by the Relevant Party	Applications for which it is established during inspection that a document not issued by the relevant party has been uploaded are concluded as "Rejection: Document Not Issued by the Relevant Party."
10)	Rejection: Misleading Transaction	Where it is determined that a duplicate transaction has been carried out, or in the case of attempts aimed at preventing the risk analysis from operating correctly, the application is concluded as "Rejection: Misleading Transaction."

No.	Inspection Result	Explanation
11)	Cancellation: Inspector's Cancellation	Applications with no non-compliance, but requiring correction of information inadvertently declared by the company, are concluded as "Cancellation: Inspector's Cancellation."

4.4 Handling Requests

Handling requests may be considered only for corrective operations other than those requiring technical intervention such as impact or notching. For products that are non-compliant with the applicable technical legislation in terms of importer information, warnings, or other aspects that can be remedied within the customs-controlled area, correction requests that do not pose any risk in terms of health, safety, environmental protection, or the provision of accurate information to consumers are notified in writing to the relevant inspection unit.

Where such a handling request is considered appropriate, the company is granted a handling period of up to 30 days. Handling operations must be carried out in an area under the control of the customs directorate. Where the handling operation is completed within, or by the end of, the 30-day handling period, the company must submit a written petition to the relevant inspection unit stating that the deficiencies have been remedied. Following submission of the petition, the application must not be concluded until the inspection units have examined, in the customs-controlled area, whether the handling operation has been carried out in accordance with the applicable technical legislation and the handling operations have been completed. Where it is determined that the required corrections have been made, the application is concluded as "Acceptance: Inspection Result." Handling operations carried out by the customs administration without application to the relevant inspection unit will not be accepted.

4.5 Appeal Against Inspection Results

Applications concluded as "Rejection" due to failure to submit documents within the prescribed period, or applications in respect of which the company objects on the grounds that the inspection was erroneously concluded as "Rejection" by the inspector (e.g. where a marking, brand, model, etc. may have been overlooked, or where an out-of-scope request is made), may be reopened for inspection. In this context, companies may object to the inspection result only once, within 1 year, through the objection button available in TAREKS for applications concluded as "Rejection." The period for objecting to test results is 15 working days.

For applications reopened for inspection, no additional 45-day period shall be granted, and the importer shall be requested to promptly submit the missing documents, objection petition, technical file where requested, and fulfil its other obligations. Companies shall in no way be permitted to object to applications concluded as "Rejection: Document Not Issued by the Relevant Party" or "Rejection: Misleading Transaction." However, for applications concluded as "Rejection: Missing Documents," the missing documents; for applications concluded as "Rejection: Missing Marking," documents such as pictures, designs, diagrams, etc. indicating the location of the missing marking, together with the objection petition and other documents; and

for applications concluded as “Rejection: Test Result,” a petition requesting retesting; and, in all cases, any additional documentation requested by the inspector, must be uploaded to the system within a maximum of 15 working days. Applications of companies that fail to fulfil their obligations within this period shall again be concluded with the same rejection, and a further objection through the system shall not be permitted.

Where, despite an objection made through the system within 1 year, the application is again concluded as “Rejection,” a request to reopen the application for inspection to enable the company to remedy the deficiencies may be considered by the General Directorate on a one-time basis. For applications reopened for inspection under this provision, no additional 45-day period shall be granted, and the importer shall be requested to submit the missing document within 15 working days.

4.6 Transit Requests for Products Found Non-Compliant

Where companies wish to transit products covered by an application concluded as a “Rejection” following inspection, such requests require the favorable opinion of the General Directorate, pursuant to subparagraph (ç) of the fourth paragraph of Article 181 of the Customs Regulation. Companies in this situation must apply in writing to the General Directorate; in their applications they must state the country to which the product is to be transited, declare that the product complies with the legislation of the relevant country, and fully complete the documents set out in Annex-4, in accordance with the “Transit Permit” heading under the “Old Help” tab of TAREKS. Where the products are to be returned to the country of origin, the favorable opinion of the General Directorate is not required.

Utmost diligence must be exercised given the possibility that non-compliant products intended for transit trade may be placed on the domestic market in the name of the relevant company and/or different companies, either in their entirety or by splitting the consignment, thereby becoming subject to inspection, and any applications giving rise to suspicion must be reported urgently to the General Directorate.

Where it is determined that inspection has been avoided through unlawful means such as unauthorized transit trade, the application isconcluded as “Rejection: Misleading Transaction,” taking into account the absence of the products subject to the application at customs and such avoidance actions.

5. Individual Principles Relating to Products

5.1 Inspections Carried Out Within the Scope of KKDIK Annex-17

No.	Product Group	Test Component	Parts to Be Tested	Limit Value
1.	Plastic Gloves for Household Use	Dioctyltin (DOT)	Parts of plastic materials intended to come into contact with the skin	0.1%
		Cadmium	Plastic materials (Where different colors of the same model exist, each color must be tested separately.)	Equal to or greater than 0.01%

No.	Product Group	Test Component	Parts to Be Tested	Limit Value
2.	Mouse Pad	Cadmium	Materials with plastic content (Where different colors of the same model exist, each color must be tested separately.)	Equal to or greater than 0.01%
		Lead	Metal, plastic, glass, leather, imitation leather, and painted metal and other painted materials (Where different colors of the same model exist, each color must be tested separately.) (In addition to the content test, a migration test should also be requested as a second control analysis (per EN 71-3), and results should be assessed against the 0.05 microgram/cm² limit value.)	0.05%
3.	Imitation Jewelry, Cufflinks, Wristwatches*, Watch Straps	Azo dyes	Textile and imitation-leather materials that may come into direct and prolonged contact with human skin and the oral cavity (White-colored materials are not tested, unless the white material is printed with other colors, in which case it must be tested.)	0.003%
		Cadmium	Imitation leather (coated plastics), plastic, metal, painted materials (Where different colors of the same model exist, each color must be tested separately.)	Plastics and metals: 0.01%, Paints: 0.1%
		Nickel	Metal, coated metal materials, and other metal-coated materials (plastic, etc.) that come into direct and prolonged contact with the skin (Every differently colored part present on the product must be tested.) (Contact of at least three times, 10 minutes each, within two weeks, or at least once for 30 minutes within two weeks, is treated as prolonged skin contact.) (The test cannot be repeated on the same sample.)	0.5 µg/cm²/week

No.	Product Group	Test Component	Parts to Be Tested	Limit Value
			(Measurement uncertainty must be taken into account.)	
		Lead	Metal, plastic, glass, leather, imitation leather, and painted metal and other painted materials (Where different colors of the same model exist, each color must be tested separately.) (For content-based lead testing of jewelry items (necklaces, bracelets, rings, watches, cufflinks, etc.), where the test result exceeds 500 ppm, the product must be assessed as non-compliant.)	0.05%
		PAH	Rubber, plastic components, and imitation leathers (coated textiles) in continuous or short but repeated direct contact with human skin or the oral cavity, under normal or reasonably foreseeable conditions of use	Adult products: 1 mg/kg Children's products: 0.5 mg/kg
		Chromium VI	Genuine leather materials in contact with the skin	0.0003%
4.	Cases/Covers	Azo dyes	Textile and imitation-leather materials that may come into direct and prolonged contact with human skin and the oral cavity (White-colored materials are not tested, unless the white material is printed with other colors, in which case it must be tested.)	0.003%
		Cadmium	Imitation leather (coated plastics), plastic, metal, painted materials (Where different colors of the same model exist, each color must be tested separately.)	Plastics and metals: 0.01%, Paints: 0.1%
		PAH	Rubber, plastic components, and imitation leathers (coated textiles) in continuous or short but repeated direct contact with human skin or the oral cavity, under normal or reasonably foreseeable conditions of use	Adult products 1 mg/kg Children's products: 0.5 mg/kg

No.	Product Group	Test Component	Parts to Be Tested	Limit Value
		Lead	Coated/varnished/painted genuine leather, imitation leather (coated plastics), plastic, glass, coated paper and painted materials, in items offered to the public that children may place in their mouths, or their parts (Where different colors of the same model exist, each color must be tested separately.) (In addition to the content test, a migration test should also be requested as a second control analysis (per EN 71-3), and results should be assessed against the 0.05 microgram/cm² limit value.)	0.05%
		Chromium VI	Genuine leather materials in contact with the skin	0.0003%
		Nickel	Metal, coated metal materials, and other metal-coated materials (plastic, etc.) that come into direct and prolonged contact with the skin (Every differently colored part present on the product must be tested.) (Contact of at least three times, 10 minutes each, within two weeks, or at least once for 30 minutes within two weeks, is treated as prolonged skin contact.) (The test cannot be repeated on the same sample.) (Measurement uncertainty must be taken into account.)	0.5 µg/cm²/week
		Phthalate	In imitation leather (coated plastics) and plastic materials in contact with the skin (DEHP, DBP, BBP, DINP, DIDP and DNOP)	0.1%
6.	Tattoo Ink	PAH	PAHs (and naphthalene) must be checked pursuant to entry 75 of Annex XVII of the REACH Regulation.	Benzo[a]pyrene: 0.0000005% Other PAHs: 0.00005%

No.	Product Group	Test Component	Parts to Be Tested	Limit Value
		Organotin	The limits for dibutyltin (DBT) under paragraph 5 of entry 20 of Annex XVII of the REACH Regulation, and for organotin compounds under entry 75 of Annex XVII of the REACH Regulation, apply.	Dibutyltin (DBT): 0.1% Organotin compounds: 0.00005%
7.	Stationery Products	Azo dyes	Textile and imitation-leather materials that may come into direct and prolonged contact with human skin and the oral cavity (White-colored materials are not tested, unless the white material is printed with other colors, in which case it must be tested.)	0.003%
		Lead	Metal, plastic, glass, leather, imitation leather, and painted metal and other painted materials (Where different colors of the same model exist, each color must be tested separately.) (In addition to the content test, a migration test should also be requested as a second control analysis (per EN 71-3), and results should be assessed against the 0.05 microgram/cm² limit value.)	0.05%
		Cadmium	Imitation leather (coated plastics), plastic, metal, painted materials (Where different colors of the same model exist, each color must be tested separately.)	Plastics and metals: 0.01%, Paints: 0.1%
		Chromium VI	Genuine leather materials in contact with the skin	0.0003%
		DMFu	Leather, textile and wood materials	0.1 mg/kg
		PAH	Rubber, plastic components, and imitation leathers (coated textiles) in continuous or short but repeated direct contact with human skin or the oral cavity, under normal or reasonably foreseeable conditions of use	Adult products 1 mg/kg Children's products: 0.5 mg/kg

No.	Product Group	Test Component	Parts to Be Tested	Limit Value
		Nickel	Metal, coated metal materials, and other metal-coated materials (plastic, etc.) that come into direct and prolonged contact with the skin (Every differently colored part present on the product must be tested.) (Contact of at least three times, 10 minutes each, within two weeks, or at least once for 30 minutes within two weeks, is treated as prolonged skin contact.) (The test cannot be repeated on the same sample.) (Measurement uncertainty must be taken into account.)	0.5 µg/cm²/week
		TBT (tributyltin)	All items, except substances and mixtures that are not articles	0.1%

** For watches, upon the request of the importing company and where deemed appropriate by the inspection unit, the products may be tested using the XRF method.*

*** Pursuant to the said Regulation, articles that children may place in their mouths are classified as articles having any spatial dimension smaller than 5 cm, or having removable or detachable parts smaller than 5 cm.*

5.2 Inspections Carried Out Within the Scope of the Relevant Technical Legislation

No.	Product Group	Relevant Legislation	Matters Requiring Attention
1.	Hand, face and surface disinfectants	Biocidal Products Regulation	The warnings and markings on the product must be checked in accordance with the applicable legislation. The product's license must be checked via the link https://www.titck.gov.tr/dinamikmodul/85. The license must be issued in the name of the importer. The license and the product label must match. Disinfectants for veterinary hygiene, disinfectants used in the food and feed sectors, and drinking-water disinfectants fall outside the scope. Products that are medical-device disinfectants must be inspected under the Import Inspection Communiqué for Medical Devices (Product Safety Communiqué No. 16).

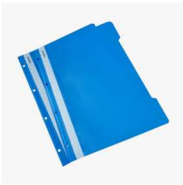
No.	Product Group	Relevant Legislation	Matters Requiring Attention
2.	Hinges, furniture rails	TS EN 15338+A1 / TS EN 15570	Extension elements (drawer rails) are assessed under the TS EN 15338+A1 standard, while hinges attached to vertical-axis doors are assessed under the TS EN 15570 standard. Hinge and rail products directed to physical inspection must be classified as Class I, and tests applied accordingly.
3.	Lasers	TS EN 60825-1/A11	Products intended for direct consumer use for entertainment purposes, or laser products that consumers are likely to use under foreseeable conditions, must be inspected; other products are assessed as out of scope.
4.	Manual toothbrushes	TS EN ISO 20126	The characteristics specified in Section 4 of the relevant standard must be tested. Single-tuft interdental brushes, single-use products, interdental brushes, and electric oral-hygiene devices are out of scope.
5.	Lighters	TS EN ISO 9994 / TS ISO 22702	Lighters for cigarettes, cigars and pipes fall under TS EN ISO 9994, while other lighters fall under TS ISO 22702. Where lighters are found to have an appearance different from what they purport to be, their import must not be permitted.

5.3 Sample Test Procedures for Stationery Products

Product Group	Product Characteristics	Tests That May Be Requested under KKDIK Annex-17	Example Image
Ballpoint Pen	Plastic item that children may place in their mouths	Lead (in mouthable parts, excluding the pen tip) Cadmium (in plastic parts) PAH (in plastic parts subject to prolonged contact) TBT	
Ballpoint Pen	Unpainted metal item that children may place in their mouths	Lead (in mouthable parts, excluding the pen tip) Nickel (in metal parts subject to prolonged contact) TBT	
Ballpoint Pen	Painted metal item that children may place in their mouths	Lead (in mouthable parts, excluding the pen tip) Cadmium (in painted parts) Nickel (in metal parts subject to prolonged contact)	

Product Group	Product Characteristics	Tests That May Be Requested under KKDIK Annex-17	Example Image
		TBT	
Pencil	Painted wooden item that children may place in their mouths	Lead (in mouthable parts, excluding the pen tip) Cadmium (in painted parts) TBT DMF	
Felt-Tip Pen	Plastic item that children may place in their mouths	Lead (in mouthable parts, excluding the pen tip) Cadmium (in plastic parts) PAH (in plastic parts subject to prolonged contact) TBT	
Eraser	Rubber item that children may place in their mouths	Lead (in mouthable parts) PAH (in rubber/plastic parts subject to prolonged contact) TBT Cadmium (plastic-based erasers only)	
Pencil Sharpener	Plastic item that children may place in their mouths	Lead (in mouthable parts) Cadmium (in plastic parts) PAH (in plastic parts subject to prolonged contact) TBT	
Pencil Sharpener	Unpainted metal item that children may place in their mouths	Lead (in mouthable parts) Nickel (in metal parts subject to prolonged contact) TBT	
Scissors	Item with plastic content that children may place in their mouths	Lead (in mouthable parts) Cadmium (in plastic parts) PAH (in plastic parts subject to prolonged contact) TBT	
Scissors	Metal item unlikely to be placed in children's mouths	Nickel (in metal parts subject to prolonged contact) TBT	

Product Group	Product Characteristics	Tests That May Be Requested under KKDIK Annex-17	Example Image
Pencil Case	Item with textile content that children may place in their mouths	Lead (in mouthable parts) Nickel (in metal parts subject to prolonged contact, e.g. zipper) Azo dyes (in textile that may come into direct and prolonged contact with human skin and the oral cavity) Cadmium TBT DMF	
Pencil Case	Leather item that children may place in their mouths	Lead (in mouthable parts) Nickel (in metal parts subject to prolonged contact, e.g. zipper) Azo dyes (in imitation-leather parts that may come into direct and prolonged contact with human skin and the oral cavity) Cadmium Chromium VI (in genuine-leather parts in contact with the skin) TBT DMF	
Paint	Mixture manufactured for use in professional artwork	Cadmium	
Pastel Crayon	Item that children may place in their mouths	Lead (in mouthable parts) Cadmium TBT	
Watercolor Paint	Item containing plastic that children may place in their mouths	Lead (in mouthable parts) Cadmium PAH (in plastic parts subject to prolonged contact, e.g. brush) TBT	
Dry/Powder Paint	Painted wooden item that children may place in their mouths	Lead (in mouthable parts) Cadmium TBT DMF	

Product Group	Product Characteristics	Tests That May Be Requested under KKDIK Annex-17	Example Image
Plastic Folder	Plastic item that children may place in their mouths	Lead (in mouthable parts) Cadmium PAH (in plastic parts subject to prolonged contact) TBT	

6. Annexes

Annex – 1 Physical Inspection/Sampling Report

IMPORT INSPECTIONS

PHYSICAL INSPECTION/SAMPLING REPORT

Date: .../.../....

Application Date/Number:

Importer's Name/Tax Number:

Location of the Products:

Elements Identified During Physical Inspection (manufacturer/importer information, brand-model, marking, presence of warnings, product type, etc.)

Example 1: The product bears the CE marking, brand-model, and manufacturer information, and these are compliant. Importer information is missing.

Example 2: The product bears the CE marking, but its design is non-compliant.

If a sample was taken:

Total number of samples taken:

Sample-bag barcode number:

I accept the accuracy of the information stated above. I accept that the samples taken/examined under this report represent the entirety of the relevant products covered by the above-mentioned application, and that the results shall be binding. I undertake that all costs arising from testing procedures shall be borne by us, and I accept that the inspection shall be concluded according to the test result. I accept that, following notification of the inspection result to us, we may object to the test result only within 15 working days, and undertake that, if we do not collect the sample by the end of the objection period, we shall not assert any claim of right regarding the samples in question.

Company Representative

Name Surname:

Signature:

Date:

Trade Inspector/Assistant Trade Inspector

Name Surname:

Signature:

Date:

Annex.2 Sample Rejection Inspector Message

As a result of the examinations carried out, the application has been concluded as "Rejection: ..." on the grounds of ... .

The products may be returned to the country of origin, transited directly or via a free zone to a third country, sold under an export registration, or abandoned to the customs administration where the products are located for disposal by destruction, provided that the costs are borne by the owner.

Following submission of an objection via the objection button available in the system and prompt submission of the objection petition to the relevant Group Directorate, your objection to the inspection result may be considered. The period for objecting to test results is 15 working days.

Annex.3 Procedures and Principles Relating to Transit

Where it is determined, as a result of inspections carried out within the scope of Product Safety and Inspection (ÜGD) Communiqués, that products do not comply with the applicable technical regulation and/or are not safe, the matters that must be included in, and the conditions that must be met for, the application to be made by the importer to the Ministry so that the products may be transited to a third country are as follows:

1) Transit is not permitted to member states of the European Union (EU) Common Market, member states of the European Free Trade Association (EFTA), the Turkish Republic of Northern Cyprus, or free zones.

2) Opinions may be obtained from the relevant institutions, organizations, and general directorates regarding the countries to which transit is to be carried out, within the framework of conjunctural developments in international trade.

3) The application to be submitted to the Ministry by the importing company for the relevant products to be transited must include the following:

- a) The duly completed table set out in Annex-4C,
- b) A declaration and undertaking that the product to be transited complies with the legislation of the country to which it is to be transited (Annex-4A),
- c) A warehouse declaration, bill of lading, sample invoice, and other documents,
- d) A specimen signature circular and/or power of attorney demonstrating that the person making the application has authority to sign and/or represent.

4) Where the relevant products are transferred by the importing company to another company, the application to be submitted to the Ministry by the transferee company for the relevant products to be transited must include the following:

- a) The duly completed table set out in Annex-4D,
- b) Documents such as an invoice evidencing that the products have been transferred,
- c) A declaration and undertaking that the product to be transited complies with the legislation of the country to which it is to be transited (Annex-4B),
- d) A warehouse declaration, bill of lading, sample invoice, and other documents,
- e) A specimen signature circular and/or power of attorney demonstrating that the person making the application has authority to sign and/or represent.

5) In order for the transferee company to obtain a transit permit, it must be registered in the Risk-Based Control System for Foreign Trade (TAREKS).

6) A transit permit request submitted to the Ministry is concluded favorably once it is confirmed that the specified conditions have been met. In this context, notification that the transit permit has been granted is made to the relevant customs administration and to the company.

7) Furthermore, in order to prevent attempts to re-place transited products on our domestic market, notification is made to the General Directorate of Customs and to the General Directorate of Trade Research and Risk Assessment, so that these products may be monitored for a period of at least 3 months.

8) In order to prevent, through the system, the subsequent re-import of transited products into our country, information relating to the transit transaction is entered into TAREKS.

TO THE MINISTRY OF TRADE

(General Directorate of Product Safety and Inspection)

As a result of the inspection carried out under Product Safety Inspection Communiqué No. ..., application No. ..., made through the Risk-Based Control System for Foreign Trade by ... company for products with GTIP code ... and described as ..., was concluded as a rejection.

Pursuant to subparagraph (ç) of the fourth paragraph of Article 181 of the Customs Regulation, we wish to transit the products that received a rejection as a result of the inspection to ... (country name). We declare and undertake that the products in question comply with the legislation of ... (country name), to which they are to be transited.

We respectfully submit this for your consideration and necessary action.

Name/Title of the Importer or its Representative

Company Stamp

Authorized Signature(s)

Date

Products Subject to Transit Request

Company Tax No.	**TAREKS Application**	**Bill of Lading Date**	**Bill of Lading No.**	**GTIP/Product Type**	**Quantity**

TO THE MINISTRY OF TRADE

(General Directorate of Product Safety and Inspection)

As a result of the inspection carried out under Product Safety Inspection Communiqué No. ..., application No. ..., made through the Risk-Based Control System for Foreign Trade by ... company for products with GTIP code ... and described as ..., was concluded as a rejection. The products in question were transferred and delivered by the said company to ... company under transfer invoice No. ... .

Pursuant to subparagraph (ç) of the fourth paragraph of Article 181 of the Customs Regulation, we wish to transit the products that received a rejection as a result of the inspection to ... (country name). We declare and undertake that the products in question comply with the legislation of ... (country name), to which they are to be transited.

We respectfully submit this for your consideration and necessary action.

Name/Title of the Transferee Company or its Representative

Company Stamp

Authorized Signature(s)

Date

Products Subject to Transit Request

Transferring Co. Tax No.	**Transferee Co. Tax No.**	**TAREKS Application**	**Bill of Lading Date**	**Bill of Lading No.**	**GTIP/Product Type**	**Quantity**