



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

GUIDE ON IMPORT INSPECTION OF BATTERIES AND ACCUMULATORS *Handbook on Implementation Principles*

2026

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

Contents

Contents	2
1. Scope and Basis	3
2. Import Inspection Applications	3
2.1 Application by the Importing Company	3
2.2 Exemptions and Exceptions	3
2.3 Submission of Application Documents	3
3. Inspection Processes	4
3.1 Scope Check	5
3.2 Verification of Application Information	5
3.3 Verification of Application Documents	5
3.4 Physical Inspection	6
3.4.1 Warnings	7
3.5 Testing Procedures	7
3.5.1 Equivalent Products	7
3.6 Application Cancellation Procedures	8
3.7 Duplicate Applications	9
3.8 Documents Not Issued by the Relevant Party	9
3.9 Attempts to Mislead the System	10
4. Finalization of the Inspection	10
4.1 Applications to be Finalized with Conditional Acceptance	10
4.1.1 Conditional Acceptance: Minor Deficiency	10
4.2 Applications to be Finalized with Rejection	11
4.3 Compliance Inspection Results	11
4.4 Handling Requests	13
4.5 Appeals Against Inspection Results	14
4.6 Transit Requests for Non-Compliant Products	14
5. Product-Specific Principles	15
6. Annexes	20
Annex-1 – Warnings Required to Appear on Products	20
Annex-2. Physical Inspection and Sampling Record	22
Annex-3. Sample Rejection – Inspector Message	23
Annex-4. Procedures and Principles Regarding Transit Transactions	24

1. Scope and Basis

This Guide is intended to establish the procedures and principles for conducting and finalizing the actual (physical) inspections of the products falling within the scope of the Communiqué on the Import Inspection of Batteries and Accumulators, 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 of 5/3/2020, the Decision on the Technical Regulations Regime put into effect by Presidential Decision No. 6038 of 14/9/2022, and the Regulation on Technical Regulations in Foreign Trade published in Official Gazette No. 32281 of 16/8/2023.

With regard to matters not covered by the inspection guides, instructions issued as a result of company applications, unless otherwise specified, are not confined to the individual case but also apply to other companies in the same situation.

The principles and arrangements set out in this Guide may 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 falling within the “List of Products Subject to Inspection” set out 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 arrangement set out in Article 6 of the Communiqué governs the application. Accordingly, the user authorized to act on behalf of the company files the application through TAREKS, entering the data relating to the import consignment via the “Access to E-Signature Applications” section under the “E-Signature Applications” part of the Ministry’s website. Upon the application, TAREKS assigns the company an application number solely for the purpose of tracking its transactions before the relevant inspection unit.

2.2 Exemptions and Exceptions

The characteristics of applications granted exemption and exception from import inspection are set out in Article 7 of the Communiqué. Accordingly, products bearing an A.TR certificate, returned goods, and products specified in Part Five of the Decision on the Implementation of Certain Provisions of Customs Law No. 4458, annexed to Council of Ministers Decision No. 2009/15481 of 9/9/2009, are exempt from actual inspection.

However, pursuant to the last paragraph of Article 7 of the Communiqué, applications bearing an A.TR certificate may, where necessary, also be directed to actual inspection based on the assessment carried out. In such assessments, in addition to risk analysis, account is also taken of matters such as the results of the review of documents submitted by the company in its previous applications, whether it has submitted a document not issued by the relevant party, and whether it has made cancelled or duplicate applications.

2.3 Submission of Application Documents

For every application, the documents specified in items 1 and 2 of Annex-2 of the Communiqué must be uploaded to the system. For products directed to actual inspection, the documents specified in item 3 of Annex-2 of the Communiqué must be uploaded in full to TAREKS electronically within twenty working days, including the day of application. Where such documents are incomplete and the company wishes to continue with the application, the system will grant the company an additional period. Where the required documents are not uploaded within the period granted, the application will be finalized by the system as “Rejection: Missing Documents”. Where a company wishes to reopen for inspection an application finalized by the system as “Rejection: Missing Documents” due to missing documents specified in Annex-2, the application may be reopened for inspection once only, through the additional-time-request button available in the system.

Where documents required to be uploaded in respect of applications made by users through TAREKS that are subjected to actual inspection cannot be uploaded to the system owing to a technical problem, the required documents are submitted in person to the relevant Group Directorate. Where an application is made in person, the related documents may be delivered by persons authorized under a power of attorney. In this case, a power of attorney evidencing that the person is authorized to carry out the relevant transactions on behalf of the importer must be submitted. Where no power of attorney is submitted, inspection procedures will not be carried out.

Where the application file submitted for a single application made through TAREKS in respect of products falling under the same Customs Document contains:

- more than one HS code (GTIP);
- products of different kind, origin, brand or model under the same HS code;
- products with different manufacturers,

it is sufficient for documents that are common to and applicable for each application file — such as the customs document, invoice, and declarations of conformity — to be uploaded to TAREKS only once.

3. Inspection Processes

Where an application made through TAREKS by the user authorized to act on behalf of the company is directed to actual inspection, the inspection process begins. The import inspection process, referred to as actual inspection, is carried out covering some or all of the following matters, in the order set out below.

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

First, the TAREKS application information is verified and the scope check is carried out. Once it has been 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 the relevant legislation. As a result of the risk analysis carried out by TAREKS, products may be directed to testing. Where the inspection units have reason to suspect that products may be risky, the inspection may be escalated to a higher inspection stage.

3.1 Scope Check

In applications directed by TAREKS to actual inspection, it is checked whether the product falls within the scope of the relevant technical legislation and whether it is among the products intended to be inspected in terms of its HS code (GTİP) equivalent. Applications relating to products found to be out of scope are finalized as “Out of Scope: Inspection Result”.

Where a product is declared out of scope by the company representative through TAREKS, the product is nevertheless directed to actual inspection on its first import; products found to be out of scope are finalized as “Out of Scope: Inspection Result”. Whether products previously found, as a result of inspection, to be out of scope are directed to actual inspection on subsequent imports is determined according to risk analysis.

3.2 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 incorrectly declared, the application is cancelled by the inspection unit and the importing company must file a new application through the system. However, where the brand or model has been inadvertently declared incorrectly, the necessary corrections may be made through the system, in consultation with the relevant inspection unit, without cancelling the application.

3.3 Verification of Application Documents

In order to determine the conformity of the products subject to the application with the relevant technical legislation, the information and documents submitted by the company are checked.

Documents must, in principle, be submitted in Turkish. However, documents submitted in English are also accepted. Notarized translations of documents may also be requested where deemed necessary.

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

Photographs uploaded to the system as part of a TAREKS application must be of 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 do not depict the same product, the matter is reported to our General Directorate. Where it is determined that photographs were uploaded for the purpose of abusing 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 are found not to relate to the product, and provided it is concluded that the company did not intend to mislead the inspection units, the company is given an additional 45-day period to complete the documents relating to the product. Where the documents requested are not submitted within the 45-day additional period, running from the date on which the relevant inspector first requested the document through TAREKS, the application is finalized as "Rejection: Missing Documents". Applications must not be finalized by the inspector as a cancellation on grounds of missing documents.

3.4 Physical Inspection

Where the system directs products to physical inspection, the products may be subjected to physical inspection in order to establish a causal link between the products and the documents uploaded to the system, and to clear up any doubts that may arise regarding products directed to document inspection. During physical inspection it is essential to determine the products' age group, whether the product contains materials such as fabric or plastic, whether all required reports have been submitted, and, for products for which no report can be submitted, which tests are to be required. Details of the findings must be recorded in the Physical Inspection/Sampling Record set out in Annex-2.

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

For products undergoing 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 will be rearranged without regard to the original application date. Where the products are not present at the inspection site, the application will be finalized as "Rejection: Inspection Result".

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

Products for which there is a serious, justified doubt as to safety may be sent to a laboratory for testing, with action taken according to the test result. Where the importing company does not agree to testing and requests, by petition, a finding of non-compliance, the application is finalized as "Rejection: Inspection Result". Where the importing company objects

to the decision to test or to a non-compliance finding made by petition, the matter is 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 on the product in the manner prescribed by the relevant legislation. Where warnings required to appear on the product under the relevant technical legislation are missing or absent, handling of the product within the customs-controlled area to add such warnings may be permitted. (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 by TAREKS straight to testing, the products are sent for testing (subject to the company's consent).

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

During sampling, the necessary information must be entered in the Physical Inspection/Sampling Record set out in Annex-2, which must be signed both by the relevant inspector and by the company's authorized representative. At this stage, the representative's power of attorney is checked, and photographs of the samples taken are taken by the inspection unit. The sample retained by the inspection unit is recorded in the sample register.

Counter-samples are retained by the Group Directorate. The period for objecting to test results is 15 working days. Where an objection is raised against the test results, the counter-samples are, where possible, sent for retesting to a testing body different from the laboratory to which the products were originally sent.

For files that are directed by the system to testing but that cannot in fact be tested owing to testing capacity, product characteristics, or the number of products, the process must instead continue as a review of the test report; such cases must be reported promptly to our General Directorate, together with the HS code and the reason testing could not be carried out.

Where the importing company does not agree to the product being sent for testing, the application will be finalized, on the basis of the company's written declaration, as "Rejection: Inspection Result".

3.5.1 Equivalent Products

In applications in which a large number of items are directed to testing, not all models are sent for testing. Among the products within the same application sharing the same manufacturer, brand, material and product type, one is selected as the reference model and sent for testing to represent the equivalent products.

Application items relating to models that may be treated as equivalent to a tested item are not closed until the test of the model in the tested application item has concluded, even where the system has not itself directed such items to testing.

Where the reference model passes the test and appropriate documents (test report, EU Declaration of Conformity, etc.) exist for all equivalent items, the application in question is finalized through TAREKS as “Acceptance: Inspection Result”. Where the reference model 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 subsequently passes a second test conducted solely in respect of the matter for which non-compliance was found, and appropriate documents (test report, EU Declaration of Conformity, etc.) exist for all equivalent items, the application in question is finalized through TAREKS as “Acceptance: Inspection Result”.

Where the reference model fails the test and the company either does not object to the test result, or objects but the product also fails the second test, the reference model must be finalized as “Rejection: Test Result”. In that case, at the company’s request, all equivalent models may also be sent for testing. Applications for which the importing company requests a finding of non-compliance without testing are finalized, on the basis of the petition submitted, as “Rejection: Inspection Result”.

3.6 Application Cancellation Procedures

Cancellation is a procedure that allows only for the correction of a factual error or errors identified during examination of an existing application, so that the application may be repeated. Applications still under inspection may be cancelled only by the inspector.

Where one or more items of application information, other than the brand and model, have been incorrectly or incompletely recorded in the system, a message explaining the matter is sent by the relevant inspection unit through the “Inspection Messages” tab, and the inspection procedure for the application continues through to its final stage. Where the inspection establishes that the products cannot pass import inspection, the application is finalized as “Rejection”; in other cases, so as to allow the company to correct its error, the application is finalized as “Cancellation: Inspector’s Cancellation”. The factual error concerned must be recorded as an inspector’s note when the application is closed. Where the brand or model has been inadvertently declared incorrectly, 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 already subjected to inspection by the inspection unit are, following completion of the inspection process, cancelled owing to factual errors, inspection procedures for the same consignment must thereafter be carried out according to the type of inspection assigned by TAREKS.

Where, while an inspection is ongoing, a request is made for the products subject to inspection to be transferred to another company, inspection procedures relating to the application continue to be carried out under the existing application; where the products covered by the application are compliant, upon submission of documents evidencing the transfer, the transferring company's application will be finalized as "Cancellation: Inspector's Cancellation". Where any doubt arises regarding the transfer, the matter must be reported to our General Directorate.

Cancellation requests made by companies otherwise than in the circumstances set out above will not be accepted. A request for cancellation of an application on the grounds that the products are being returned to origin, or transited to another country, will not be accepted. However, upon a written petition from the company requesting that the application be finalized as a rejection, the application may be finalized as a rejection.

3.7 Duplicate Applications

Making a new application, or opening a new item, through TAREKS for the purpose of importing products that are the subject of an application whose inspection has already been finalized as a rejection, or for the purpose of avoiding inspection of products that are the subject of an application/application item still under inspection, is termed a duplicate application. This undermines the effective and correct functioning of risk analysis.

In order to prevent duplicate applications, the following matters must be observed in respect of inspection applications found to contain a factual error in the application information:

- Once it is understood that an application needs to be cancelled, company representatives must be informed immediately by the relevant inspection unit, and the cancellation must be carried out following completion of the inspection process;
- In the relevant inspection message, and in any communication with the company representative, it must be firmly stressed that no new application should be made for the products subject to cancellation until the cancellation has been confirmed through the system, and that failure to observe this may result in sanctions against the company and the user.

Within this framework, where it is determined that a company has made a duplicate application, the inspections must be finalized directly as "Rejection: Misleading Transaction" and the matter must be reported to our General Directorate.

3.8 Documents Not Issued by the Relevant Party

Where doubt arises as to the authenticity of a document submitted within the scope of an import inspection, its authenticity is investigated through the website of the issuing institution. Where this is not possible, the issuing institution is contacted by e-mail and the authenticity of the document is verified. Where the reply received states that the documents are forged, or are not correct, valid or consistent, the document in question will be regarded as not issued by the relevant party. Where the information requested by e-mail from the relevant institution is not received within 20 days, the matter is reported to our General Directorate.

Where it is established that a document submitted to TAREKS was not issued by the relevant party, renewal of the document is not requested. The inspection is finalized directly as “Rejection: Document Not Issued by the Relevant Party” and the matter is reported to our General Directorate. Administrative sanctions will be applied to both the company and the user concerned pursuant to Article 13 of the Communiqué.

In addition, the following are required:

- Where the original document exists on the relevant institution’s website, this fact must be stated in the letter to be sent to our General Directorate;
- Where contact is made with the relevant institution by e-mail, the entire original document, or its cover page, must be requested and submitted as an attachment to the letter sent to our General Directorate;
- Where the correct document or its cover page cannot be obtained, this must be stated in the letter addressed to our General Directorate.

Where it is found that falsification has occurred, or that a transaction of doubtful authenticity has been carried out, in respect of the information and documents submitted for one of the application items, action is taken under the above provisions solely for the item(s) in doubt, while the other item(s) are inspected and completed in accordance with the relevant technical legislation.

3.9 Attempts to Mislead the System

As attempts aimed at preventing the correct functioning of risk analysis are regarded as transactions misleading the system, where such attempts are detected the application in question must also be finalized as “Rejection: Misleading Transaction”.

4. Finalization of the Inspection

4.1 Applications to be Finalized with Conditional Acceptance

4.1.1 Conditional Acceptance: Minor Deficiency

Unless otherwise specified in the applicable technical legislation, where the Turkish-language instructions for use required to accompany the product, or the importer information required to appear on the product/packaging, cannot be established, the application is finalized as “Conditional Acceptance – Minor Deficiency: Inspection Result”, so that whether such deficiencies have been remedied can subsequently be verified through market surveillance and inspection practices.

1. Conditional Acceptance: Inspection Result

Where it is stated that the products will be used as intermediate products in motor vehicles, and a capacity report and a letter of undertaking are submitted, provided that the capacity report and the letter of undertaking declaring that the products will be used in production are examined and found appropriate, that the information required under the legislation to appear on the products is present, and that the products’ non-compliant outer packaging is abandoned in

the customs-controlled area, it is considered appropriate for such applications to be finalized as “Conditional Acceptance: Inspection Result”.

4.2 Applications to be Finalized with Rejection

Where non-compliance with the relevant legislation is identified as a result of the inspection, the application is finalized 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 by means of the message set out in Annex-5. The matter is notified to the customs administration in a letter stating the ground for rejection, and the customs administrations will not permit the import of the product concerned.

Where products need to be tested and the importing company does not agree to have them tested, and instead requests by petition a finding of non-compliance, the application will be finalized as “Rejection: Inspection Result”.

Where, in TAREKS applications, companies have collectively entered information on more than one product (brand-model-quantity, etc.) under a single item, and it is understood that the application item contains both products to be finalized as a rejection and products whose import may be permitted, a new TAREKS application is made for the compliant products, and after the new application has been made the existing application is finalized as “Rejection: Inspection Result”. A new TAREKS application may be made only for the products found compliant. Where it is found that a new application has been made for non-compliant products, the products concerned will be dealt with in accordance with the principles applicable to duplicate applications.

Where it is determined, in applications directed to actual inspection through TAREKS whose inspection process is ongoing, that inspection is being avoided through unlawful means such as improper use of a TPS (temporary storage) number or unauthorized transit trade, the application must be finalized as “Rejection: Misleading Transaction”, taking into account the absence of the products at customs and these avoidance actions, and our General Directorate must be informed of the matter without delay.

Where it is determined that the products are not present in the customs-controlled area during inspection — for example, because the order arrived incomplete or the products have not yet reached the customs-controlled area — the relevant application item must be finalized as “Rejection: Inspection Result”, since no determination or examination of the products could be carried out.

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 the actual

No.	Inspection Result	Explanation
		inspection, the application is finalized as “Acceptance: Inspection Result”.
2	Out of Scope: Inspection Result	Where it is determined that the products are not within the scope of the relevant technical legislation and/or are not among the products intended to be inspected in terms of their HS code (GTIP) equivalent, the application is finalized as “Out of Scope: Inspection Result”.
3	Conditional Acceptance – Minor Deficiency: Inspection Result	So that deficiencies identified during inspection are remedied immediately after completion of import procedures, and in any case before being placed on the market, applications are finalized as “Conditional Acceptance – Minor Deficiency: Inspection Result”.
4	Conditional Acceptance – Further Processing: Inspection Result	Applications for which the necessary documents have been obtained for semi-finished products intended to be turned into the final product after being placed on the market are finalized as “Conditional Acceptance – Further Processing: Inspection Result”.
5	Conditional Acceptance – Warning: Inspection Result	Where the conformity marks required to appear on the product have not been affixed at the appropriate size, provided there is no other non-compliance, the application is finalized as “Conditional Acceptance – Warning: Inspection Result”.
6	Rejection: Inspection Result	Where non-compliance with the relevant legislation is identified as a result of the inspection, the application is finalized as “Rejection: Inspection Result”.
7	Rejection: Missing Documents	Where the documents requested are not submitted within the period granted during inspection, the inspection is finalized as “Rejection: Missing Documents”.
8	Rejection: Marking Deficiency	Where the conformity marks required under the relevant legislation are absent from the product, the

No.	Inspection Result	Explanation
		application is finalized as “Rejection: Marking Deficiency”.
9	Rejection: Test Result	Applications sent for testing during inspections for which the test result is negative are finalized as “Rejection: Test Result”.
10	Rejection: Document Not Issued by the Relevant Party	Applications in which it is found during inspection that a document not issued by the relevant party has been uploaded are finalized as “Rejection: Document Not Issued by the Relevant Party”.
11	Rejection: Misleading Transaction	Where it is established that a duplicate transaction has been carried out, or in the case of attempts aimed at preventing the correct functioning of risk analysis, the application in question is finalized as “Rejection: Misleading Transaction”.
12	Cancellation: Inspector’s Cancellation	Applications with no non-compliance, but for which information inadvertently declared by the company needs correction, are finalized as “Cancellation: Inspector’s Cancellation”.

4.4 Handling Requests

Handling requests will be considered only for corrective actions other than those requiring technical intervention such as impact or notching. For products that are non-compliant with the technical legislation in respects such as the Turkish-language instructions for use, labelling, marking (excluding the brand, model and CE mark) and packaging — deficiencies that can be remedied within the customs-controlled area — correction requests that raise no concern in terms of health, safety, environmental protection, and the correct information of consumers are to be reported in writing to the relevant inspection unit.

Where such a handling request is deemed 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 at the end of, the 30-day 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 products must

be examined by the inspection units within the customs-controlled area to determine whether the handling operation has been carried out in accordance with the relevant technical legislation, and the application must not be finalized until the handling operation has been completed. Where it is determined that the necessary corrections have been made, the application is finalized as “Acceptance: Inspection Result”. Handling operations carried out through the customs administration without applying to the relevant inspection unit will not be accepted.

4.5 Appeals Against Inspection Results

Reopening for inspection may be applied for in respect of applications finalized as a rejection owing to the untimely submission of documents, or applications that the company appeals on the ground that the inspector’s rejection decision was made in error (for example, the possibility that a mark, brand, model, etc. was overlooked, or an out-of-scope request was mishandled). In this context, companies may appeal against the inspection result for applications finalized as a rejection, once only, within 1 year, through the appeal button available in TAREKS. The period for objecting to test results is 15 working days.

For applications reopened for inspection, no further 45-day additional period will be granted; the importer will be asked to submit its missing documents, appeal petition, technical file (if requested) and other obligations urgently. Companies may under no circumstances appeal against applications finalized as “Rejection: Document Not Issued by the Relevant Party” or “Rejection: Misleading Transaction”. However, in applications finalized as “Rejection: Missing Documents”, the missing documents; in applications finalized as “Rejection: Marking Deficiency”, documents such as pictures, designs or diagrams indicating the location of the missing marking; the appeal petition and other documents; and in applications closed as “Rejection: Test Result”, the retest request petition — and, in all cases, any additional documentation requested by the inspector — must be uploaded to the system within no more than 15 working days. Applications of companies that fail to fulfil their obligations within this period will again be finalized with the same rejection, and a further appeal through the system will not be permitted.

Where, despite an appeal made through the system within 1 year, the application is again finalized as a rejection, a request by the company that the application be reopened for inspection so that the deficiencies may be remedied may be assessed by the General Directorate, on a one-time basis only. For applications reopened for inspection in this manner, no further 45-day additional period will be granted; the importer will be asked to submit the missing document within 15 working days.

4.6 Transit Requests for Non-Compliant Products

Where companies wish to transit products that are the subject of an application finalized as “Rejection” as a result of inspections carried out, such requests require the favourable opinion of our 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 our General Directorate; in their application they must state the country to which the product is to be transited, declare that the product complies with the legislation of that country, and fully complete the documents set out in Annex-6, in accordance with the “Transit Permit” heading under the “Old

Help” tab in TAREKS. Where products are returned to their country of origin, the favourable opinion of our General Directorate is not required.

Utmost care must be exercised in transactions carried out to guard against the possibility that all or part of non-compliant products intended for transit trade — whether as a whole consignment or through splitting of the consignment — are placed on our domestic market in the name of the relevant company and/or different companies and thereby become subject to inspection; our General Directorate must be informed without delay of any applications giving rise to suspicion in this regard.

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

5. Product-Specific Principles

5.1 Classification of Battery Systems

Primary Batteries (Non-Rechargeable)	Secondary Batteries (Rechargeable)
Zinc-Carbon	Nickel-Cadmium
Alkaline-Manganese	Nickel-Metal Hydride
Zinc-Silver Oxide	Maintenance-Free Lead-Acid
Zinc-Air	Lithium-Ion
Zinc-Mercury Oxide	Lithium-Polymer
Lithium	

5.2 Mandatory Test Limits by Battery Type

Battery Type	Substances to be Tested	Maximum Permitted Weight Ratio
Primary Batteries (Non-Rechargeable)	Mercury (Hg)	0.0005% (five parts per million)

Battery Type	Substances to be Tested	Maximum Permitted Weight Ratio
	Cadmium (Cd)	0.025% (twenty-five parts per hundred thousand)
Secondary Batteries (Rechargeable)	Mercury (Hg)	0.0005% (five parts per million)
Button Cell Batteries	Cadmium (Cd)	0.025% (twenty-five parts per hundred thousand)
	Mercury (Hg) / Mercury Oxide	2% (two percent)

5.3 Batteries Composed of Different Models

Requirement Area	Detailed Description	Purpose	Example Application
Scope	Battery/pack assemblies newly manufactured through the connection/combination of multiple individual battery components for the final product.	To document that the individual battery components within the final product comply with the Regulation's heavy-metal limits.	If a Ni-MH battery (Model T138) is a combination of 3 units of "60AA" cells, tests must be conducted for the 60AA model.
Mandatory Document – 1	The importing company must submit the test report(s) for the model(s) of the cell/battery used in the imported battery.	To prove that each individual cell (battery) making up the battery pack complies with the heavy-metal limits (e.g. Hg and Cd tests).	For an "x" model battery pack composed of "a" model cells, the test report for model "a" is required.
Mandatory Document – 2	A declaration completed and signed by the	To formally declare the connection and structure of the	The manufacturer must provide a declaration

Requirement Area	Detailed Description	Purpose	Example Application
	manufacturer will be requested.	imported battery (the final product) in relation to the individual cell models it contains.	stating that battery “T138” is composed of “3 units of 60AA” cells.
Content of the Declaration	The declaration must contain statements, drawings, etc. relating to the cell models contained in the imported battery.	—	—

5.4 General Test Report and Determination of Accumulators

Topic	Basis / Requirement	Notes
General Test Report (Acceptability)	The importer may submit a single general report showing all analyses for all “x” brand batteries it imports, or for a specific group of batteries.	As this report covers all products to be imported, it removes the need to obtain a repeat analysis report.
Content of the General Report	The report must present the analysis of all “x” brand batteries; the codes, names and other details of each must be specified.	The purpose is to demonstrate, through a single report, the compliance of more than one product type with the Regulation.
Distinction between Battery and Accumulator	Whether a product is a “battery” or an “accumulator” is determined by reference to the nominal voltage value indicated on the product.	Where the nominal value is 2 Volts or a multiple thereof (6V, 12V, 24V, 36V, etc.), the system treats it as an “accumulator”.

5.5 Harmonized Standard

Topic	Products Covered	Mandatory Standard
Labelling and Marking	Certain secondary cells and secondary batteries (Nickel-Cadmium and Lead-Acid batteries only).	Labelling and marking must be carried out in accordance with the TS EN 61429 Standard.

5.6 Inspection Procedures

- For batteries, button-type batteries containing more than five parts per million of mercury must bear, on their packaging, the marking referred to in Annex-1 of the relevant WEEE/battery (APAK) Regulation and illustrated above (Figure 1). For secondary-cell batteries, under the relevant standard (TS EN 61429), marking is mandatory only for lead-acid and nickel-cadmium batteries. Although there is no marking requirement for other batteries, the use of such marks on them must not be regarded as a non-compliance.

- Where doubt arises during import inspections as to whether a product is out of scope, the General Directorate of Product Safety and Inspection (ÜGD) will be contacted, together with information on the type and characteristics of the product.

- Button cells must bear no marking whatsoever; marking must instead be applied to the packaging.

- Although not defined in the Regulation, for “rechargeable button batteries” — a product type previously subject to inspections carried out by our Ministry — in line with the opinion received from the Ministry of Environment and Urbanisation, such batteries, because they meet the mercury limits specified in the Regulation for button batteries and are rechargeable, must be marked and labelled in the manner specified in the TS EN 61429 Standard.

- Although the legislation contains no provision regarding expiry dates, where information to this effect appears on the product or in the documents and the expiry date has passed, import of such products is not permitted.

- In import inspections only the final product should be examined; components and parts must be regarded as out of scope for import inspection purposes.

- No inspection will be carried out on batteries and accumulators imported together with a product, as part of that product, to serve as its power source.

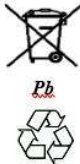
- For accumulator cells that will be combined at a later stage in Türkiye to form the final product, marking will not be checked, but the Environmental Compliance Certificate will be required.

- For small accumulators for which marking or labelling is very difficult to apply, the required marking and labelling may instead be applied to their packaging.

- There is no need to inspect lithium-ion batteries for mercury content.¹
- Regarding products classified under HS heading 8507 sought to be imported, in the assessment made by the Ministry of Environment, Urbanisation and Climate Change under the Regulation on the Control of Waste Batteries and Accumulators, it was stated that, as that Regulation defines accumulators (akü) as rechargeable energy sources that generate electricity through a chemical reaction between lead and sulphuric acid, and as the products in question do not meet these technical characteristics, they cannot be classified as accumulators and must instead be assessed as batteries (pil).
- Under Article 4 of the Regulation on the Control of Waste Batteries and Accumulators, an accumulator is defined as a source of electrical energy produced, in rechargeable secondary cells, by the direct conversion of chemical energy resulting from the chemical reaction between lead and sulphuric acid; it is assessed that the product in question cannot be classified as an accumulator under this definition. Within this framework, it is considered appropriate for the product in question to be assessed as a battery under the current legislation.
- For applications within the scope of the Communiqué that are directed to testing as a result of TAREKS Risk Analysis, where, during the import inspection of the products covered, the accuracy of the information on the products and of their structural and technical characteristics is verified at the testing stage and any inconsistency is identified, the applications must be finalized as a rejection; however, this must be taken into account only where the technical information required under the legislation is present on the product, and the absence, on the product, of technical information not made mandatory by the legislation must not result in the application being finalized as non-compliant.
- As a result of the assessment carried out within the framework of our Customs Union obligations, it is considered that preventing the entry into our domestic market of products already compliant with the technical legislation currently in force in the EU would give rise to technical barriers to trade. Accordingly, while inspections of batteries bearing the CE mark under Regulation (EU) 2023/1542 must also be carried out in accordance with the current procedures and principles of Product Safety and Inspection Communiqué No. 2025/15, for the reasons set out above there is no need for the CE mark to be covered through handling.

6. Annexes

Annex-1 – Warnings Required to Appear on Products

Rule	Product Group Covered	Mandatory Marking and Labelling Requirements	Example Illustration / Notes
1	All Batteries and Accumulators	To ensure the separate collection of waste, the “crossed-out wheeled bin” symbol set out in Annex-1 of the WEEE (battery) Regulation must be used.	 <i>Figure 1 – EC symbol of a crossed-out wheeled bin</i>
2	Nickel-Cadmium (Ni-Cd) and Lead-Acid (Pb) Secondary Cells and Batteries	Marking and labelling must be carried out in accordance with the TS EN 61429 Standard. (This marking includes the symbols shown in Figure 1 and Figure 2.)	 <i>Figure 2 – ISO 7000-1135 recycling symbol</i>
3	Nickel-Cadmium (Ni-Cd) and Lead-Acid (Pb) Secondary Cells and Batteries	Only nickel-cadmium and lead-acid secondary cells and secondary batteries must additionally be marked with the chemical symbol indicating their electrochemical system (Pb or Ni-Cd).	<i>Marking of Nickel-Cadmium batteries:</i>  <i>Ni-Cd</i> <i>or</i>  <i>Ni-Cd</i> <i>Marking of Lead-Acid batteries:</i>  <i>Pb</i> <i>or</i>  <i>Pb</i>
4	Button Cell Batteries	Button-type batteries containing more than five parts per million (0.0005%) by weight of mercury (Hg), and batteries composed of such button cells, must have their packaging marked with the symbol shown above (Figure 1).	 <i>Figure 1 – EC symbol of a crossed-out wheeled bin</i>

Rule	Product Group Covered	Mandatory Marking and Labelling Requirements	Example Illustration / Notes
5	Waste Accumulators	To ensure that waste accumulators are returned to the manufacturers responsible for their recovery, the labelling of these products must include the statutory Turkish wording "...depozitoludur" ("refundable deposit") together with the code number assigned to the company by the Ministry.	AKÜ-XX (Firma Kodu) DEPOZİTOLUDUR  Example: "ACCU-XX (Company Code) REFUNDABLE DEPOSIT" – statutory wording, shown here in Turkish as required on the product: "AKÜ-XX (Firma Kodu) DEPOZİTOLUDUR"
6	Lead-Acid Accumulators	Lead-acid accumulators must bear on their surface the statutory Turkish wording "Pb" or "kurşun" (lead) together with "GERİ KAZANILIR" (recoverable) or "GERİ KAZANILACAK AKÜ" (accumulator to be recovered); the same wording must also appear on the outer packaging.	AKÜ-XX (Firma Kodu) DEPOZİTOLUDUR  Pb KURŞUN GERİ KAZANILIR GERİ KAZANILACAK AKÜ Example – statutory Turkish wording as required on the product

Annex-2. Physical Inspection and Sampling Record

IMPORT INSPECTIONS PHYSICAL INSPECTION / SAMPLING RECORD

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 mark, and the brand-model and manufacturer information are present and compliant. The importer information is missing.

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

If samples were taken:

Total number of samples taken:

Number of counter-samples taken:

I accept the accuracy of the information stated above. I accept that the samples taken/examined under this record represent all of the relevant products covered by the above-mentioned application, and that the results are binding. I undertake to bear all costs arising from the testing procedures, and I accept that the inspection will be finalized according to the test result. I accept that, following notification to us of the inspection result, we may object to the test result only within 15 working days, and I undertake that, if we do not collect the sample by the end of the objection period, we will assert no right whatsoever in respect of that sample.

Company Representative

Name / Surname:

Signature:

Date:

Trade Inspector / Assistant Trade Inspector

Name / Surname:

Signature:

Date:

Annex-3. Sample Rejection – Inspector Message

For the reason(s) of ..., the application has been finalized as “Rejection: ...”. You have the right to return the products to their country of origin; to transit them, directly or via a free zone, to a third country; to sell them for the purpose of export; or to abandon them, at your own expense, to the customs administration where they are located, to be disposed of by destruction. Where an objection is raised through the objection button available on the system, and the objection petition is urgently forwarded to the relevant Group Directorate, your objection to the inspection result may be evaluated. The period for objecting to test results is 15 working days.

Annex-4. Procedures and Principles Regarding Transit Transactions

Where it is determined, as a result of inspections carried out under Product Safety and Inspection (ÜGD) Communiqués, that products do not comply with the applicable technical regulation and/or are not safe, the matters to be included in, and the conditions to be met by, the application to be made by the importer to our Ministry for the products to 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 sought from the relevant Institutions, Organizations and General Directorates regarding the countries to which transit is to take place, in light of developments in the international trade environment.

3) The importing company's application to the Ministry for the transit of the relevant products must include the following:

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

4) Where the importing company transfers the relevant products to another company, the transferee company's application to the Ministry for the products to be transited must include the following:

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

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

6) A transit-permit request submitted to the Ministry is finalized favourably once it has been confirmed that the stated conditions are met. Within this framework, notification that the transit permit has been granted is made to the relevant customs administration and to the company.

7) In addition, in order to prevent attempts to re-place the 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-importation into our country of transited products, information relating to the transit transaction is entered into TAREKS.

Annex-4A

**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 Foreign Trade Risk-Based Control System by ... company for products with HS code ... and description ..., has been finalized as a rejection.

Under 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 submit this for your instruction and consideration.

Name / Title of the Importer or its Representative

Company Stamp

Authorized Signature(s)

Date

Annex-4B

**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 Foreign Trade Risk-Based Control System by ... company for products with HS code ... and description ..., has been finalized as a rejection. The products in question have been transferred and delivered by the said company to ... company under transfer invoice No.

Under 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 submit this for your instruction and consideration.

Name / Title of the Transferee Company or its Representative
Company Stamp
Authorized Signature(s)
Date

Annex-4C

Company Tax Number	TAREKS Application	Bill of Lading Date	Bill of Lading Number	HS Code / Product Type	Quantity

Name / Title of the Importer or its Representative

Company Stamp

Authorized Signature(s)

Date

Annex-4D
PRODUCTS SUBJECT TO THE TRANSIT REQUEST

Transferring Company Tax Number	Transferee Company Tax Number	TAREKS Application	Bill of Lading Date	Bill of Lading Number	HS Code / Product Type	Quantity

Name / Title of the Transferee Company or its Representative
Company Stamp
Authorized Signature(s)
Date

¹ ÜGD Letter No. 46419634 of 30/07/2019.