



**KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ**

Sayı : 35649853-TİM.KİB.GSK.UYG.2024/985-3238

Giresun, 09/10/2024

Konu : Dünya Ticaret Örgütü (DTÖ) Ticarete Teknik Engeller (TTE) Komitesi

E-POSTA

**KARADENİZ İHRACATÇI BİRLİKLERİ ÜYELERİNE SİRKÜLER
2024/618**

Sayın üyemiz,

Ticaret Bakanlığı Ürün Güvenliği ve Denetimi Genel Müdürlüğünün bir yazısına atfen, Türkiye İhracatçılar Meclisinden alınan 09/10/2024 tarih2447 sayılı yazıda,

Dünya Ticaret Örgütü (DTÖ) Ticarete Teknik Engeller (TTE) Anlaşmasının şeffaflık ilkesi çerçevesinde üye ülkeler tarafından hazırlanan teknik düzenleme taslaklarıyla ilgili bir uluslararası standardın bulunmaması veya hazırlanan mevzuatın teknik içeriğinin uluslararası standartlarla uyumlu olmaması ve diğer DTÖ üyesi ülkelerin ticaretini etkileme potansiyeli bulunması durumunda bildirim yükümlülüğü bulunduğu, anılan yazıda devamlı, ülkemiz adına söz konusu bildirimlerin “Bilgi ve Bildirim Merkezi” sıfatıyla Ticaret Bakanlığınca yapılmakta olduğu ve üye ülkelerin birbirlerinin ticaretini etkileme potansiyeline sahip teknik düzenlemelerini TTE Anlaşması bağlamında ele aldığı bir platform olan TTE Komitesi toplantılarına katılım sağladığı, komitenin 2024 yılındaki üçüncü toplantısının 5–8 Kasım 2024 tarihlerinde Cenevre/İsviçre’de yapılacağı, bununla birlikte, DTÖ üyesi ülkelerin küresel ticarete teknik engel yaratma potansiyeline sahip muhtelif mevzuat taslakları ve uygulamalarının “Özel Ticari Kaygılar” (Specific Trade Concerns- STC) başlığı altında görüşülmekte olduğu, ülkemizin de STC ihdas etmek ya da mevcut STC’leri desteklemek yoluyla TTE Komite toplantılarında görüş beyan edebildiği ifade edilmektedir.

Bu çerçevede, son olarak 4–7 Haziran 2024 tarihlerinde yapılan toplantıda Avrupa Birliği’nin;

Atık Sevkiyatı Tüzüğü (*Regulation of the European Parliament and of the Council on shipments of waste and amending Regulations (EU) No 1257/2013 and (EU) No 2020/1056*),

Ambalaj ve Ambalaj Atığı Tüzüğü (*Regulation on packaging and packaging waste amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC*),

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ŞAHİN KURUL tarafından 5070
sayılı kanun gereğince güvenli
elektronik imza ile
imzalanmıştır.

Ayrıntılı bilgi için: Şahin KURUL – Şube Müdürü



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Ormansızlaşmanın Önlenmesi Tüzüğü (*Regulation (EU) 2023/1115 of the European Parliament and of the Council on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010*) düzenlemelerine karşı muhtelif ülkelerce gündeme getirilen ve ekte özet bilgileri yer alan STC'lerin ülkemizde desteklediği ve anılan düzenlemelere ilişkin ticari endişelerin dile getirildiği bildirilmekte olup, bu itibarla, ülkemiz ticari çıkarlarının daha etkin bir şekilde savunulabilmesini teminen ekli tabloda yer alan ve desteklenmesinde fayda görülen STC'ler ile söz konusu STC'ler özelinde ihracatta teknik engel oluşturabilecek hususlara ilişkin görüş ve değerlendirmeler talep edilmektedir.

Ticarete Teknik Engeller kapsamında yaşanan sorunlar ile ilgili dile getirilmesi istenen hususlara ilişkin görüş ve değerlendirmelerin aşağıda yer alan tabloda belirtilerek **11 Ekim 2024 Cuma günü saat 15.00'e kadar** Genel Sekreterliğimize gönderilmesi gerektiği hususunu bilgilerinize sunarız

e-imzalıdır
Şahin KURUL
Genel Sekreter a.
Şube Müdürü

Not: Ülkelerin Ticari Endişelerine ilişkin DTÖ Veri Tabanına aşağıdaki linkten erişim sağlanabilmektedir.

<https://tradeconcerns.wto.org/en/stcs?searchParameterDomainIds=1&searchParameterMeetings=2024-Second>

Ek: Özel Ticari Kaygılar (STC'ler) Listesi (7 Sayfa)

Görüş ve Değerlendirme Tablosu

Görüş Bildiren İhracatçı Birliği	STC Konusu	Görüş ve Değerlendirmeler	İlgili Kurum

Karadeniz İhracatçı Birlikleri Genel Sekreterliği
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Ayrıntılı bilgi için: Şahin KURUL – Şube Müdürü

IMS ID	Domain	Title	Member(s) Responding to Trade Concern	Member(s) raising Trade Concern	Member(s) supporting to Trade Concern	First date raised	Last date raised	Number of times raised
837	TBT	Canada Québec's Bill 96, An Act respecting French, the official and common language of Québec (ID 837)	Canada	United States	European Union	05/06/2024	05.06.2024	1
836	TBT	Colombia - Draft Resolution expanding the technical regulations applicable to braking systems and their components; Draft Resolution adopting the technical regulation applicable to braking systems and their components, for use in motorcycle-type vehicles; & Draft Resolution issuing the Technical Regulation applicable to pneumatic tyres for motorcycles and setting forth other provisions (ID 836)	Colombia	United States		05/06/2024	05.06.2024	1
835	TBT	China - National Food Safety Standard of the P.R.C.: General Principles for the Labelling of Prepackaged Foods (GB7718) (ID 835)	China	European Union		05/06/2024	05.06.2024	1
834	TBT	United States - Energy Conservation Program: Product Classes for Residential Dishwashers, Residential Clothes Washers, and Consumer Clothes Dryers (ID 834)	United States	China		05/06/2024	05.06.2024	1
833	TBT	India - Amendment to the "Electronics and Information Technology Goods (Requirement of Compulsory Registration) Order, 2021 (ID 833)	India	Republic of Korea		05/06/2024	05.06.2024	1
832	TBT	United States - State-level Measures Prescribing Space Requirements for Farm Animals (ID 832)	United States	Canada	Australia; New Zealand	05/06/2024	05.06.2024	1
831	TBT	European Union - Proposal for a Regulation of the European Parliament and of the Council laying down harmonized conditions for the marketing of construction products, amending Regulation (EU) 2019/1020 and repealing Regulation (EU) 305/2011 (COM/2022/144 final) of the EU (ID 831)	European Union	China		05/06/2024	05.06.2024	1
830	TBT	India - Cookware and Utensils (Quality Control) Order, 2023 (ID 830)	India	European Union		13/03/2024	05.06.2024	2
829	TBT	Australia - Proposed changes to the Industrial Chemicals General Rules and Categorisation Guidelines (ID 829)	Australia	European Union		13/03/2024	05.06.2024	2
828	TBT	India - Furniture (Quality Control Order), 2023 (ID 828)	India	European Union		13/03/2024	05.06.2024	2
827	TBT	Indonesia - Mandatory application of SNI standards on 6 plastic products (ID 827)	Indonesia	India		13/03/2024	05.06.2024	2
823	TBT	European Union - Delegated Regulation on protected denominations of origin and protected geographical indications for wine and on the presentation of compulsory particulars for grapevine products and specific rules for the indication and designation of ingredients for grapevine products, and certification of imported wine products (ID 823)	European Union	United States	Australia; New Zealand	13/03/2024	05.06.2024	2
822	TBT	India - Plywood and Wooden flush door shutters (Quality Control) Order, 2023 (ID 822)	India	Indonesia		13/03/2024	05.06.2024	2
818	TBT	European Union - Proposal for a Regulation of the European Parliament and of the Council on the safety of toys and repealing Directive 2009/48/EC (COM(2023) 462 final) (ID 818)	European Union	China	United States	13/03/2024	05.06.2024	2
817	TBT	Kingdom of Saudi Arabia - Technical Regulations for Electric Vehicles 03-04-17-162 of Saudi Arabia (ID 817)	Kingdom of Saudi Arabia	China		13/03/2024	05.06.2024	2
816	TBT	European Union - Proposal for a Regulation of the European Parliament and of the Council on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014 (ID 816)	European Union	Japan; Republic of Korea; United States; China	Australia	13/03/2024	05.06.2024	2

813	TBT	Mozambique - Regulation on standardization and conformity assessment, decree No. 8/2022 of 14.03.2022 (G/TBT/N/MOZ/17) and Conformity assessment procedure of imported products for mandatory control during customs clearance of 16.08.23 (not notified) and Ministerial Diploma No. 98/2023 establishing taxes on products to be exported to Mozambique of 14.07.2023 (not notified) (ID 813)	Mozambique	European Union		08/11/2023	05.06.2024	3
810	TBT	India - Medical Textiles (Quality Control) Order, 2023 (ID 810)	India	Indonesia		08/11/2023	05.06.2024	3
809	TBT	Philippines - Implementing Guidelines of the Philippine Energy Labeling Program for Clothes Washing Machines (ID 809)	Philippines	Republic of Korea		08/11/2023	05.06.2024	3
807	TBT	European Union - Regulation (EU) 2023/1115 of the European Parliament and of the Council on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 (ID 807)	European Union	India; Indonesia; Australia; Mexico; New Zealand; Paraguay; United States; Canada; Colombia	Ecuador; Argentina; Guatemala; Indonesia; Australia; Mexico; New Zealand; Panama; Peru; Russian Federation; Singapore; Türkiye; Brazil; Canada; Costa Rica	08/11/2023	05.06.2024	3
806	TBT	Argentina, Uruguay - Draft Resolution No.02/23 -MERCOSUR Technical Regulation on definitions relating to alcoholic beverages (except fermented beverages), their raw materials and manufacturing processes (Repeal of GMC Resolution No.77/94)) (ID 806)	Argentina; Uruguay	European Union; Mexico	Guatemala	08/11/2023	05.06.2024	3
805	TBT	India - Draft Food Safety and Standards (Alcoholic Beverages) Amendment Regulations, 2023 (ID 805)	India	European Union; Mexico; United States		08/11/2023	05.06.2024	3
803	TBT	Angola - Executive Decree No. 64/2023: Implementation of high security tax stamps on alcoholic beverages and liquids, tobacco and its substitutes (ID 803)	Angola	European Union; Mexico	Mexico	21/06/2023	05.06.2024	4
797	TBT	India - Footwear (Quality Control Order), 2020 (ID 797)	India	United Kingdom	European Union; United States	21/06/2023	05.06.2024	4
793	TBT	Malaysia - Revision of the Regulations on Alcoholic Beverages in Food Regulations 1985 (ID 793)	Malaysia	European Union; Japan	Japan; Mexico	08/03/2023	05.06.2024	5
792	TBT	European Union - Amendment of the authorisation for the active substance sulfoxaflor (ID 792)	European Union	Brazil	Argentina	08/03/2023	05.06.2024	5
790	TBT	India - Viscose Staple Fibres (Quality Control) Order, 2022 (ID 790)	India	European Union; Indonesia		08/03/2023	05.06.2024	5
786	TBT	European Union - Proposal for a Regulation on packaging and packaging waste amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (ID 786)	European Union	India; Mexico; Russian Federation; United States; China	Guatemala; India; Türkiye	08/03/2023	05.06.2024	5
784	TBT	China - Interim Regulation on Radio Management of Wireless Charging (Power Transmission) Equipment (ID 784)	China	Japan; United States	European Union	08/03/2023	05.06.2024	5

783	TBT	European Union - Proposal for a Regulation of the European Parliament and of the Council on shipments of waste and amending Regulations (EU) No 1257/2013 and (EU) No 2020/1056 (ID 783)	European Union	Indonesia	Türkiye	08/03/2023	05.06.2024	5
780	TBT	India - Order related to requirement of Health certificate accompanied with imported food consignment of Milk and Milk Products, Pork and Pork Products & Fish and Fish Products (ID 780)	India	European Union; United States	Japan; Australia; New Zealand; Switzerland; United States; Canada	16/11/2022	05.06.2024	6
779	TBT	Morocco - Conformity assessment (ID 779)	Morocco	European Union		16/11/2022	05.06.2024	6
768	TBT	European Union - Draft Commission Regulation laying down ecodesign requirements for mobile phones, cordless phones and slate tablets pursuant to Directive 2009/125/EC of the European Parliament and of the Council (ID 768)	European Union	Republic of Korea; China		16/11/2022	05.06.2024	6
763	TBT	European Union - Draft Commission Regulation amending Annexes II and V to Regulation (EC) No 396/2005 of the European Parliament and of the Council as regards maximum residue levels for clothianidin and thiamethoxam in or on certain products (ID 763)	European Union	Ecuador; India; Indonesia; Kenya; Australia; Paraguay; Peru; United States; Canada; China; Colombia; Costa Rica	Ecuador; Argentina; Guatemala; India; Japan; Kenya; New Zealand; South Africa; Uruguay; Brazil; Canada; Chile; Costa Rica	16/11/2022	05.06.2024	6
761	TBT	China - Recommended National Standard (GB/T) for Office Devices (Information security technology – Security specification for office devices) (ID 761)	China	Japan	European Union; Philippines	13/07/2022	05.06.2024	7
724	TBT	Indonesia - Government Regulation 28 of 2021 – Implementing Regulation (for the Manufacturing/Industry Sector) to Law No. 11 of 2020 the "Job Creation Act" (ID 724)	Indonesia	European Union; United States; China	Canada	10/11/2021	05.06.2024	9
718	TBT	Egypt – Halal Certification Measure, based on Egyptian Standard ES 4249/2014 General Requirements for Halal Food According to Islamic Sharia (ID 718)	Egypt	European Union; India; Kenya; United States; Canada	Argentina; India; Australia; New Zealand; Paraguay; Switzerland; Ukraine; United States; Canada; Chile	10/11/2021	05.06.2024	9
697	TBT	Colombia – Good manufacturing practices of overseas production establishments (ID 697)	Colombia	European Union	Mexico	02/06/2021	05.06.2024	10
694	TBT	European Union - Withdrawal of the approval of the active substance alpha-cypermethrin (ID 694)	European Union	Kenya; Brazil	Paraguay; Colombia	02/06/2021	05.06.2024	10
690	TBT	European Union - Chemical strategy for sustainability (implementation of the European Green Deal) (ID 690)	European Union	Kenya; Russian Federation	India; United States	02/06/2021	05.06.2024	10

685	TBT	European Union - Draft EU Batteries Regulation (implementation of the European Green Deal) (ID 685)	European Union	Republic of Korea; Russian Federation; China	India; Republic of Korea; Canada	02/06/2021	05.06.2024	10
678	TBT	Mexico - Conformity Assessment Procedure under Mexican Official Standard NOM-223-SCFI/SAGARPA- 2018, "Cheese Names, Specifications, Commercial Information, and Test Methods," published on 31 January 2019 (ID 678)	Mexico	United States	European Union; Australia; New Zealand	24/02/2021	05.06.2024	11
671	TBT	India - Refrigerating Appliances (Quality Control) Order, 2020 (ID 671)	India	Republic of Korea; China		24/02/2021	05.06.2024	6
667	TBT	India – Draft Food Safety and Standards (Import) Amendment Regulation, 2020 (ID 667)	India	European Union; Mexico; The Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu; United States	European Union; Argentina; Japan; Australia; New Zealand; The Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu; Canada	24/02/2021	05.06.2024	11
651	TBT	India - Order related to requirement of Non-GM cum GM free certificate accompanied with imported food consignment (ID 651)	India	European Union; United States; Brazil	Argentina; Japan; Australia; New Zealand; Paraguay; Uruguay; Canada; Chile; Colombia	28/10/2020	05.06.2024	12
632	TBT	India – Toys (Quality Control) Order, 2020 (IND/131); Amendment in Policy Condition No. 2(iii) to Chapter 95 of ITC (HS), 2017- Schedule-I (Import Policy) (IND/143) (ID 632)	India	European Union; United States; Canada; China	Hong Kong, China; United States; Canada	13/05/2020	05.06.2024	13
630	TBT	India - Quality Control Orders for Chemical and Petrochemical Substances (ID 630)	India	European Union; Indonesia; Republic of Korea; The Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu; Thailand; United States; Canada	European Union; Indonesia; Japan; Republic of Korea; Singapore; Canada	13/05/2020	05.06.2024	13

627	TBT	European Union - Non-renewal of the approval of the active substance mancozeb (ID 627)	European Union	Ecuador; Guatemala; India; Indonesia; Kenya; Australia; Nicaragua; Paraguay; United States; Brazil; Colombia; Costa Rica	Ecuador; Argentina; Guatemala; India; Panama; Paraguay; Uruguay; Chile; Costa Rica	13/05/2020	05.06.2024	13
611	TBT	China - Draft Administrative Measures for Registration of Overseas Producers of Imported Foods (ID 611)	China	European Union; India; Indonesia; Japan; Kenya; Republic of Korea; Australia; Mexico; Philippines; Switzerland; The Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu; United States; Brazil; Canada	European Union; India; Japan; Republic of Korea; Mexico; Peru; Philippines; Switzerland; Türkiye; Brazil; Canada; Chile	26/02/2020	05.06.2024	14
602	TBT	Qatar - Ministry of Public Health Circular regarding shelf life for cheese (ID 602)	Qatar	European Union; United States; Canada	New Zealand; United States; Canada	13/11/2019	05.06.2024	15
594	TBT	European Union - Medical Device Regulation (MDR) and In Vitro Diagnostic Medical Devices Regulation (IVDR) (ID 594)	European Union	Japan; Republic of Korea; Mexico; United States; Canada; China	Republic of Korea; Australia; Singapore; Canada; China	20/06/2019	05.06.2024	16
580	TBT	European Union - Transitional periods for MRLs and international consultations (ID 580)	European Union	Dominican Republic; Ecuador; Egypt; El Salvador; Guatemala; India; Indonesia; Kenya; Panama; Paraguay; United States; Uruguay; Brazil; Canada; Colombia; Costa Rica	Ecuador; El Salvador; Argentina; Guatemala; India; Kenya; Panama; Paraguay; Peru; Uruguay; Brazil; Canada; Chile; Costa Rica	06/03/2019	05.06.2024	17

579	TBT	European Union - Chlorothalonil (pesticide active substance) (ID 579)	European Union	Dominican Republic; Ecuador; El Salvador; Guatemala; Honduras; Indonesia; Nicaragua; Panama; Paraguay; United States; Brazil; Canada; Colombia; Costa Rica	Ecuador; El Salvador; Guatemala; Paraguay; Brazil; Chile; Costa Rica	06/03/2019	05.06.2024	17
576	TBT	China - Cosmetics Supervision and Administration Regulation and Regulation for Notification of Non-special Cosmetics (ID 576)	China	European Union; Japan; Republic of Korea; Australia; United States	European Union; Australia; New Zealand; Brazil	06/03/2019	05.06.2024	17
534	TBT	China - Encryption Law of the People's Republic of China by the Office of State Commercial Cryptography Administration (OSCCA) (ID 534)	China	European Union; Japan; Republic of Korea; United States; Canada	United States; Canada	14/06/2017	05.06.2024	22
526	TBT	China - Cybersecurity Law (ID 526)	China	European Union; Japan; Republic of Korea; Australia; New Zealand; The Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu; United States; Canada	Australia; United States; Canada	29/03/2017	05.06.2024	23
502	TBT	Indonesia - Halal Product Assurance Law No. 33 of 2014 and its implementing regulations (ID 502)	Indonesia	European Union; Australia; New Zealand; The Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu; United States; Brazil; Canada	Australia; New Zealand; Norway; Philippines; Switzerland; The Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu; Brazil; Canada; Chile	09/03/2016	05.06.2024	26
428	TBT	China - Regulations for the Supervision and Administration of Medical Devices (Order No. 650 of the State Council) (ID 428)	China	European Union; Republic of Korea; Australia; United States; Canada		18/06/2014	05.06.2024	31

393	TBT	European Union - Hazard-based approach to plant protection products and setting of import tolerances (ID 393)	European Union	Dominican Republic; Ecuador; Egypt; Argentina; Guatemala; India; Israel; Kenya; Australia; Mexico; New Zealand; Panama; Paraguay; South Africa; Thailand; United States; Uruguay; Brazil; Canada; Chile; Colombia; Costa Rica	Ecuador; El Salvador; Argentina; Guatemala; India; Japan; Kenya; Panama; Paraguay; Uruguay; Brazil; Canada; Chile; Colombia; Costa Rica	17/06/2013	05.06.2024	34
133	TBT	India - Pneumatic tyres and tubes for automotive vehicles (ID 133)	India	European Union; Indonesia; Japan; Republic of Korea; United States; Chairman	Canada	15/03/2006	05.06.2024	46