



**KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ**

Sayı : 35649853-TİM.KİB.GSK.TEŞVİK.2026/401-691

Giresun, 03/03/2026

Konu : Zorla Çalıştırma Modülüne İlişkin Kamu Danışma Süreci

E-POSTA

**KARADENİZ İHRACATÇI BİRLİKLERİ ÜYELERİNE SİRKÜLER
2026 / 104**

Sayın üyemiz,

T.C. Ticaret Bakanlığı Uluslararası Anlaşmalar ve Avrupa Birliği Genel Müdürlüğünün bir yazısına atfen, Türkiye İhracatçılar Meclisinden alınan 27/02/2026 tarih 107-592 sayılı yazıda;

14 Eylül 2022 tarihinde Avrupa Komisyonu tarafından sunulan Tüzük teklifiyle zorla çalıştırma yoluyla üretilen ürünlerin AB iç pazarına sunulmasının yasaklanmasına yönelik yasama faaliyetlerinin başlatıldığı, bu kapsamda, 13 Aralık 2024 tarihinde yürürlüğe giren ve 14 Aralık 2027 tarihinde uygulanmaya başlanacak olan Zorla Çalıştırma Tüzüğü (Forced Labour Regulation) ile temel olarak;

- Zorla çalıştırma ile üretilen ürünlerin AB pazarında satılmasının yasaklanmasının,
- AB şirketlerinin tedarik zincirlerinin daha şeffaf hale gelmesinin,
- Küresel ölçekte insan haklarına saygının teşvik edilmesinin,
- Çocuk işçiliği ve modern kölelikle mücadele edilmesinin,

amaçlandığı belirtilmektedir.

Anılan yazıda devamla, zorla çalıştırma riskleri hakkında doğrulanabilir ve güncel bilgileri içeren bir veri tabanı oluşturulmasının öngörüldüğü, Avrupa Komisyonu tarafından Piyasa Gözetimi için Bilgi ve İletişim Sistemi (ICSMS) içinde yer alacak “Zorla Çalıştırma Modülü” için temel altyapının oluşturulmasına yönelik ilişkide yer alan Komisyon Uygulama Kararı taslağına ilişkin bir danışma sürecinin başlatıldığı, ayrıca, Zorla Çalıştırma Tüzüğü’nün etkin ve verimli şekilde uygulanabilmesini amaçlayan söz konusu modülün oluşturulmasıyla Tüzük kapsamında yürütülen soruşturmaların, karar alma ve uygulama süreçleri sırasında, Komisyon ile ulusal makamların birbirleriyle etkin şekilde iletişim kurabilmesinin planlandığı bildirilmektedir.

Öte yandan, piyasa gözetimi alanında hayata geçirilmesi öngörülen bu gelişmenin, kayıt dışı istihdamın yoğun olduğu bilinen tekstil ve tarım sektörlerinde ülkemizin AB’ye olan ihracatı ve göçmen nüfus oranı göz önüne alınarak ihracatçı firmaların risk analizi kapsamına

Karadeniz İhracatçı Birlikleri Genel Sekreterliği
Atatürk Bulvarı No:19/E PK.51 28200 GİRESUN
Telefon: 0.454.2162426 (PBX)
Faks: 0.454.2164842-2168890
e-posta: kib@kib.org.tr Kep: kib@hs01.kep.tr
Web : www.kib.org.tr

Ayrıntılı bilgi için: Can ATİK - Uzman Yardımcısı

**KARADENİZ İHRACATÇI BİRLİKLERİ
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girmemesi ve tedarik zincirlerinde şeffaflığa ilişkin farkındalığın oluşması açısından önemli olduğu, bu itibarla, kamu istişare sürecine ilişkin bilgilere aşağıdaki bağlantıdan ulaşılabileceği ve **03 Mart 2026 Salı gününe kadar** görüş verilmesinin mümkün olduğu ifade edilmektedir.

Bilgilerinize sunarız.

e-imzalıdır
Sertaç Ş. TORAMANOĞLU
Genel Sekreter

Bağlantı Linki:

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/15513-Information-and-Com%20munication-System-for-Market-Surveillance-details-and-functionalities-of-the-Forced-Labour-Module_en

Ek: Draft implementing regulation Forced Labour (13 Sayfa)



EUROPEAN
COMMISSION

Brussels, XXX
[...] (2025) XXX draft

COMMISSION IMPLEMENTING REGULATION (EU) .../...

of XXX

specifying the details and functionalities of the information and communication system to be used for the purposes of Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024 on prohibiting products made with forced labour on the Union market and amending Directive (EU) 2019/1937

(Text with EEA relevance)

This draft has not been adopted or endorsed by the European Commission. Any views expressed are the preliminary views of the Commission services and may not in any circumstances be regarded as stating an official position of the Commission.

COMMISSION IMPLEMENTING REGULATION (EU) .../...

of **XXX**

specifying the details and functionalities of the information and communication system to be used for the purposes of Regulation (EU) 2024/3015 of the European Parliament and of the Council

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024 on prohibiting products made with forced labour on the Union market and amending Directive (EU) 2019/1937¹, and in particular Article 7(7), point (a), thereof,

Whereas:

- (1) Pursuant to Article 7(1) of Regulation (EU) 2024/3015, the information and communication system referred to in Article 34 of Regulation (EU) 2019/1020 of the European Parliament and of the Council², known as the Information and Communication System for Market Surveillance ('ICSMS'), is to be used for the purposes of Chapters I ('general provisions'), III ('investigations'), IV ('decisions') and V ('enforcement') of Regulation (EU) 2024/3015, in accordance with the implementing act referred to in Article 7(7), point (a), of that Regulation.
- (2) To enable communications between the Commission and competent authorities of the Member States, among competent authorities themselves and between the competent authorities and customs authorities for the purposes of implementing and applying relevant provisions in Regulation (EU) 2024/3015, a new forced labour module of the information and communication system referred to in Article 7(1) of that Regulation should be created ('ICSMS forced labour module'). The ICSMS forced labour module is to be used by the Commission, competent authorities and customs authorities for the purposes of those communications.
- (3) To ensure the effective application and enforcement of Regulation (EU) 2024/3015, the Commission and competent authorities should also be able to access and use the information in the ICSMS forced labour module for purposes other than communications, including for performing risk-based assessments as provided for in Article 14(3), point (a), of Regulation (EU) 2024/3015 and the identification of products or product groups in accordance with Article 27(1) of that Regulation. For the same reason, customs authorities should also be able to access and use the

¹ OJ L, 2024/3015, 12.12.2024, ELI: <http://data.europa.eu/eli/reg/2024/3015/oj>.

² Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and compliance of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011 (OJ L 169, 25.6.2019, p. 1, ELI: <http://data.europa.eu/eli/reg/2019/1020/oj>).

information in the ICSMS forced labour module for the purposes of Article 7 and Chapter V, Section II, of that Regulation.

- (4) In order to ensure the protection of confidential information contained in the ICSMS forced labour module, in particular information shared during the course of investigations, access to the ICSMS forced labour module should be restricted to users designated by the Commission and competent authorities for the purposes of Chapters I, III, IV and V of Regulation (EU) 2024/3015 and by users designated by customs authorities for the purposes of Article 7 and Chapter V, Section II, of that Regulation.
- (5) To ensure effective and efficient communications through the ICSMS forced labour module for the purposes of applying Chapters I, III, IV and V of Regulation (EU) 2024/3015, and to allow for easy search of relevant data and its further processing, it is appropriate to further specify, in a standardised format, the data elements and information to be transmitted by the Commission and competent authorities related to investigations, decisions and enforcement.
- (6) To ensure the effective and efficient application of Articles 9 and 15 of Regulation (EU) 2024/3015, and in particular the effective and efficient allocation of investigations and submissions of information, the Commission should communicate to the lead competent authority the information submitted via the Single Information Submission Point that concerns alleged forced labour located in the territory of the Member State to which the lead competent authority belongs.
- (7) In order to achieve the effective and efficient application of Article 16 of Regulation (EU) 2024/3015 and, in particular, close cooperation between the Commission and competent authorities, as well as mutual assistance during investigations in accordance with Article 16(1) of that Regulation, it is necessary to set out in this Regulation the details of the information to be communicated through the ICSMS forced labour module by the lead competent authority or other competent authorities in a structured format. In particular, this Regulation should set out the details of communications by the lead competent authority or other competent authorities related to the sharing of information about suspected forced labour, requests for information and support, and requests to be closely involved in an investigation in accordance with Article 16(3) to (7) of Regulation (EU) 2024/3015, as well as communications by the lead competent authority of its conclusions on the non-initiation of an investigation and of each stage of an investigation, in accordance with Article 17(6), Article 18(2) and Article 20(7) of that Regulation.
- (8) In order to ensure the effective and efficient enforcement of decisions under Article 23 of Regulation (EU) 2024/3015, where the lead competent authority communicates decisions establishing a violation of Article 3 of that Regulation to other competent authorities and, where applicable, to the Commission, as required by Article 20(7) of that Regulation, the lead competent authority should be required to communicate certain information about those decisions in a structured format.
- (9) For the same purpose, when the lead competent authority communicates decisions establishing a violation of Article 3 of Regulation (EU) 2024/3015 to customs authorities, as required by Article 26(3) of that Regulation, it should use appropriate means of communication to be specified in this Regulation.
- (10) In order to ensure the effective and efficient application of Articles 23 and 24 of Regulation (EU) 2024/3015, the relevant competent authority should communicate to the Commission and to other competent authorities information on the economic

operator's compliance with withdrawal and disposal orders contained in a decision. The relevant competent authority should also inform the Commission and other competent authorities of the penalties applied for non-compliance with a decision as referred to in Article 23(2) of Regulation (EU) 2024/3015.

- (11) For the same purpose, the lead competent authority should communicate an electronic copy of a decision establishing a violation of Article 3 of Regulation (EU) 2024/3015 and containing an order of withdrawal or disposal to market surveillance and to other relevant authorities.
- (12) In order to ensure the effective and efficient application of Articles 20, 21 and 23 of Regulation (EU) 2024/3015, the lead competent authority should be required to communicate the withdrawal of, or changes to, a decision establishing a violation of Article 3 of that Regulation, including the outcome of judicial appeal proceedings and related information, to other competent authorities and where applicable, to the Commission.
- (13) When communicating to customs authorities the withdrawal of, or changes to, a decision establishing a violation of Article 3 of Regulation (EU) 2024/3015, in accordance with Article 26(5) of that Regulation, the lead competent authority should be required to communicate such withdrawal or changes, using appropriate means of communication to be specified in this Regulation.
- (14) In order to enable effective and efficient exchanges of relevant information between competent authorities and customs authorities, pursuant to Chapter V, Section II of Regulation (EU) 2024/3015 and, in particular, Articles 28 to 30, details of the information to be exchanged should be set out in this Regulation.
- (15) Where the application of this Regulation entails the processing of personal data, it is to be carried out in accordance with Union law on the protection of personal data, in particular Regulations (EU) 2016/679³ and (EU) 2018/1725⁴ of the European Parliament and of the Council.
- (16) To ensure that personal data contained in the information communicated in the ICSMS forced labour module and personal data relating to natural persons designated as ICSMS users is erased when it is no longer necessary for the purposes for which that data was inserted in the system, and taking into account the need for data to be available for the performance of the risk-based assessments referred to in Article 14(3), point (a), of Regulation (EU) 2024/3015 as well as considering the length of possible review and appeal procedures referred to in Article 21 of that Regulation, the periods of retention of such data should be laid down in this Regulation.
- (17) Where personal data are no longer stored in the ICSMS forced labour module, it is necessary to ensure compliance with the storage limitation principle laid down in

³ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ L 119, 4.5.2016, p. 1, ELI: <http://data.europa.eu/eli/reg/2016/679/oj>).

⁴ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295, 21.11.2018, p. 39, ELI: <http://data.europa.eu/eli/reg/2018/1725/oj>).

Article 4(e) of Regulation (EU) 2018/1725 and in Article 5(1) of Regulation (EU) 2016/679.

- (18) As regards the processing of personal data in the ICSMS forced labour module, the Commission should be considered to be a joint controller pursuant to Article 28(1) of Regulation (EU) 2018/1725, and competent authorities should be joint controllers pursuant to Article 26(1) of Regulation (EU) 2016/679. The Commission should enter into a joint controllership arrangement with competent authorities in order to establish the respective responsibilities and to ensure compliance with Regulations (EU) 2016/679 and (EU) 2018/1725.
- (19) The European Data Protection Supervisor [was consulted] in accordance with Article 42(1) of Regulation (EU) 2018/1725 and delivered an opinion on [...].
- (20) The measures provided for in this Regulation [are in accordance with the opinion of the committee] established by Article 35(1) of Regulation (EU) 2024/3015.

HAS ADOPTED THIS REGULATION:

Article 1

Use and functionalities of the forced labour module of the Information and Communication System for Market Surveillance ('ICSMS') and access thereto

1. For the purposes of effectively and efficiently applying Regulation (EU) 2024/3015, a forced labour module is hereby created in the information and communication system for market surveillance ('the ICSMS forced labour module').
2. The ICSMS forced labour module shall be used for the following purposes:
 - (a) the communication by Member States to the Commission and to the other Member States of the contact details and areas of competence of the competent authority or authorities pursuant to Article 5(3) of Regulation (EU) 2024/3015, and the updates to that information;
 - (b) for the purposes of Articles 9 and 15 of Regulation (EU) 2024/3015, the communication by the Commission pursuant to Article 9 of that Regulation to the lead competent authority of the relevant Member State of the information submitted via the Single Information Submission Point concerning alleged forced labour taking place in its territory;
 - (c) the communication by the lead competent authority of new information about suspected forced labour taking place in a territory for which it is not competent, as referred to in Article 16(3) of Regulation (EU) 2024/3015, and the corresponding details;
 - (d) the communication of a request by the lead competent authority for support by other relevant competent authorities, as well as requests by other competent authorities to be closely involved in an investigation, as referred to in Article 16(4) of Regulation (EU) 2024/3015, and the corresponding details;
 - (e) the communication of a request for information by a competent authority to another competent authority and ensuing communications as referred to in Article 16(5), (6) and (7) of Regulation (EU) 2024/3015, and the corresponding details;
 - (f) for the purposes of Article 16 of Regulation (EU) 2024/3015, the communication of a request for information by the Commission to a competent

authority and ensuing communications as referred to in Article 16(5), (6) and (7) of that Regulation, and the corresponding details;

- (g) the communication by the lead competent authority to other competent authorities and, where applicable, to the Commission of the outcome of its assessment leading to not initiating an investigation, as referred to in Article 17(5) and (6) of Regulation (EU) 2024/3015, and the corresponding details;
- (h) the communication by the lead competent authority to other competent authorities and, where applicable, to the Commission of the initiation of an investigation as referred to in Article 18(1) and (2) of Regulation (EU) 2024/3015, and the corresponding details;
- (i) the communication by the lead competent authority of the closure of an investigation, where applicable, to the Commission for the purposes of Article 16(1) of Regulation (EU) 2024/3015, and to other competent authorities as referred to in Article 20(3) of that Regulation, and the corresponding details;
- (j) the communication of a decision finding a violation of Article 3 of Regulation (EU) 2024/3015 by the lead competent authority to other competent authorities and, where applicable, to the Commission in accordance with Article 20(7) of that Regulation, and the corresponding details;
- (k) the communication by the lead competent authority of an order to withdraw and dispose of products placed or made available on the Union market to market surveillance authorities or other relevant authorities, as referred to in Article 24(1) of Regulation (EU) 2024/3015;
- (l) for the purposes of Articles 23 and 24 of Regulation (EU) 2024/3015, the communication by the relevant competent authority to the Commission and other competent authorities of information on the enforcement of withdrawal and disposal orders referred to in Article 24 of that Regulation;
- (m) for the purposes of Articles 23 and 24 of Regulation (EU) 2024/3015, the communication by the relevant competent authority to the Commission and other competent authorities, of any penalties applied for non-compliance as referred to in Article 23(2) of that Regulation;
- (n) for the purposes of Articles 20, 21 and 23 of Regulation (EU) 2024/3015, the communication by the lead competent authority to other competent authorities and, where applicable, to the Commission of any withdrawal of, and changes to, a decision, including the outcome of judicial appeal proceedings, and the corresponding details following a review referred to in Article 21 of that Regulation ;
- (o) additional communications between the Commission and competent authorities, and among the competent authorities themselves for the purposes of the effective application of Chapters I ('general provisions'), III ('investigations'), IV ('decisions') and V ('enforcement') of Regulation (EU) 2024/3015.

3. The communications referred to in paragraph 2 of this Article and the related information set out in Articles 2 to 8 of this Regulation shall be automatically notified to the Commission, where applicable, to the relevant competent authority or authorities and to other relevant authorities.

4. With a view to allowing interactions with customs authorities required pursuant to Article 7 and Chapter V, Section II, of Regulation (EU) 2024/3015, the ICSMS forced labour module shall enable:
- (a) from the entry into operation of the interconnection referred to in Article 7(3) of Regulation (EU) 2024/3015, the communication pursuant to Article 26(3) of that Regulation to customs authorities via that interconnection of the decision adopted pursuant to Article 20 of that Regulation;
 - (b) from the entry into operation of the interconnection referred to in Article 7(5) of Regulation (EU) 2024/3015, the communication via that interconnection and the processing of data, requests, notifications and other messages between competent authorities and customs authorities, as well as the exchange of ensuing communications and actions taken by customs authorities and competent authorities pursuant to Chapter V, Section II, of that Regulation and, in particular, Articles 28 to 30 thereof, including the processing of the following information on goods suspected or found to be in violation of Article 3 of Regulation (EU) 2024/3015, where relevant:
 - (i) information on the product, including the customs classification, TARIC codes, description, quantity, origin and destination, name, trade name or registered trademark, model, product identifiers, pictures of the product and packaging, and additional information, where applicable, as referred to in Article 27(2) of Regulation (EU) 2024/3015 and in any implementing act adopted in accordance with Article 27(3) of that Regulation;
 - (ii) information on the operators, including the exporter, seller, importer, buyer and declarant;
 - (iii) relevant supporting documents, including invoices, declaration of conformity, test reports;
 - (iv) administrative information, including the reference number of the customs declaration, the goods item number, the date of acceptance of the declaration, an indication of declarations containing a reduced dataset, the responsible customs offices, the reason for suspension, information on action and decisions taken by customs authorities or any appeal by economic operators;
 - (c) the communication, processing, storage and use of information on products entering or leaving the Union market that is extracted and transmitted pursuant to Article 7(6) of Regulation (EU) 2024/3015;
 - (d) the communication, processing, storage and use of information obtained or provided pursuant to the exchange of information and cooperation provided for in Article 31 of Regulation (EU) 2024/3015.
5. The information in the ICSMS forced labour module shall also be used for the performance of risk-based assessments as provided for in Article 14(3) of Regulation (EU) 2024/3015, and the identification of products or product groups for which delegated acts may be adopted, as referred to in Article 27 of that Regulation.
6. Access to the ICSMS forced labour module shall be restricted to the users designated by the Commission and competent authorities for the purposes of Chapters I, III, IV and V of Regulation (EU) 2024/3015 and by customs authorities for the purposes of Article 7 and Chapter V, Section II, of that Regulation.

Article 2

Coordination of investigations and mutual assistance

1. Where the lead competent authority discovers new information pursuant to Article 16(3) of Regulation (EU) 2024/3015, it shall communicate the following information through the ICSMS forced labour module:
 - (a) a detailed description of the information discovered;
 - (b) in attachment, all relevant supporting documents;
 - (c) the territory in which the forced labour is suspected to take place or to have taken place.
2. Where the lead competent authority requests the support of other relevant competent authorities pursuant to Article 16(4) of Regulation (EU) 2024/3015, it shall communicate the following information through the ICSMS forced labour module:
 - (a) where relevant, a reference to the investigation in relation to which support is requested;
 - (b) the competent authority or authorities from which support is requested;
 - (c) a detailed description of the support requested, including, where relevant, a request to contact economic operators as referred to Article 16(4) of Regulation (EU) 2024/3015.
3. A competent authority that has an interest in an investigation led by another competent authority and wishes to be closely involved therein pursuant to Article 16(4) of Regulation (EU) 2024/3015 shall communicate the following information through the ICSMS forced labour module:
 - (a) where relevant, a reference to the investigation in relation to which the request relates;
 - (b) the lead competent authority in charge of the investigation;
 - (c) a detailed description of the reasons for the request.
4. Where the Commission or a competent authority requests information from other competent authorities for the purposes of Article 16 of Regulation (EU) 2024/3015, it shall communicate pursuant to Article 16(5) of that Regulation the following information through the ICSMS forced labour module:
 - (a) where relevant, a reference to the investigation to which the request relates;
 - (b) the competent authority or authorities from which information is requested;
 - (c) a detailed description of the information sought;
 - (d) any supporting documents;
 - (e) the deadline for responding laid down in Article 16(5) of Regulation (EU) 2024/3015.

Article 3

No initiation of an investigation

Where the lead competent authority informs the Commission, where applicable, and the other competent authorities of its assessment that an investigation will not be initiated pursuant to

Article 17(6) of Regulation (EU) 2024/3015, it shall communicate the following information through the ICSMS forced labour module:

- (a) information identifying the product(s) subject to its assessment;
- (b) information on the economic operator(s) subject to its assessment, including their name and address of establishment;
- (c) the reasons underpinning the lead competent authority's assessment, including, where relevant, the lack of a substantiated concern or the elimination of a substantiated concern as referred to in Article 17(5) of that Regulation.

Article 4

Initiation of an investigation

Where the lead competent authority informs the Commission, where applicable, and the other competent authorities of the initiation of an investigation pursuant to Article 18(2) of Regulation (EU) 2024/3015, it shall communicate to them the following information through the ICSMS forced labour module:

- (a) the status of the investigation ('investigation initiated');
- (b) information identifying the product(s) subject to the investigation;
- (c) information on the economic operator(s) subject to the investigation, including their name and address of establishment;
- (d) the date of initiation of the investigation;
- (e) a summary of the reasons for the initiation of the investigation;
- (f) a copy of the information notified to the economic operator(s).

Article 5

Closure of an investigation

Where the lead competent authority informs the other competent authorities of the closure of an investigation in accordance with Article 20(3) of Regulation (EU) 2024/3015, as well as, where applicable, the Commission for the purposes of Article 16(1) of that Regulation, it shall communicate to them the following information through the ICSMS forced labour module:

- (a) a reference to the investigation that has been closed;
- (b) the status of the investigation ('investigation closed');
- (c) a copy of the information notified to the economic operator(s);
- (d) a summary of the reasons for closing the investigation (including, as the case may be, the lack of sufficient evidence or the elimination of substantiated concerns) and, where relevant, information on any field inspections conducted in accordance with Article 19 of Regulation (EU) 2024/3015;
- (e) the date of closure of the investigation.

Article 6

Communication of decisions on violation and of information on withdrawal and disposal of products

1. Where the lead competent authority communicates a decision establishing, pursuant to Article 20(4) of Regulation (EU) 2024/3015, a violation of Article 3 of that Regulation to the other competent authorities and to the Commission, where applicable, as referred to in Article 20(7) of that Regulation, it shall communicate the following information through the ICSMS forced labour module:
 - (a) a reference to the investigation to which the decision relates;
 - (b) the status of the investigation ('decision adopted');
 - (c) information identifying the product(s) subject to the decision;
 - (d) information on the economic operator(s) to which the decision is addressed, including their name and address of establishment;
 - (e) a summary of the reasons for adopting the decision;
 - (f) an indication of whether the order laid down in the decision requires either of the following:
 - (i) to withdraw the products placed or made available on the Union market and dispose of them or parts thereof;
 - (ii) to withhold such product(s) pursuant to Article 20(5) of that Regulation;
 - (g) the date on which the time limit laid down in the decision for the economic operator(s) to comply with the orders expires, pursuant to Article 22(1), point (b), of Regulation (EU) 2024/3015;
 - (h) an electronic copy of the decision that has been adopted.
 2. For the purposes of Article 26(3) of Regulation (EU) 2024/3015, the lead competent authority of a Member State shall communicate a decision establishing, pursuant to Article 20(4) of that Regulation, a violation of Article 3 of that Regulation to the following customs authorities, using the following means of communication:
 - (a) before the entry into operation of the interconnection referred to in Article 7(3) of Regulation (EU) 2024/3015: to the customs authorities of that Member State, using national protocols to be agreed upon between the lead competent authority and customs authorities of that Member State;
 - (b) after the entry into operation of the interconnection referred to in Article 7(3) of Regulation (EU) 2024/3015: to all customs authorities, using the ICSMS forced labour module, from which the decision adopted pursuant to Article 20(4) of that Regulation is automatically communicated to the customs risk management environment.
- For the purposes of the first subparagraph, point (a), the customs authorities of a Member State to whom a decision referred to in the first subparagraph has been communicated through national protocols shall communicate that decision to the customs authorities of the other Member States by registering it in the customs risk management environment referred to in Article 7(2) of Regulation (EU) 2024/3015.
3. For the purposes of communicating a decision referred to in paragraph 2 before the entry into operation of the interconnection referred to in Article 7(3) of Regulation (EU) 2024/3015 to customs authorities, where the Commission acts as the lead

competent authority, it shall communicate such decision to customs authorities by registering it in the customs risk management environment referred to in Article 7(2) of that Regulation.

4. For the purposes of Articles 23 and 24 of Regulation (EU) 2024/3015, the relevant competent authority shall communicate to other competent authorities and to the Commission, where applicable, through the ICSMS forced labour module without undue delay, the following information:
 - (a) the date by when the process for withdrawing the products and disposing of them has been completed, as referred to in Article 24(2) of Regulation (EU) 2024/3015;
 - (b) the date when penalties have been applied for non-compliance with the decision, as referred to in Article 23(2) of that Regulation.

Article 7

Communication of orders to withdraw and dispose of products to the market surveillance authorities and other relevant authorities

The lead competent authority that adopted a decision containing an order of withdrawal or disposal shall communicate it to the market surveillance authorities and to the other relevant authorities as referred to in Article 24(1) of Regulation (EU) 2024/3015, by way of an electronic copy of the decision containing such order of withdrawal or disposal.

Article 8

Communication of withdrawal of or changes to a decision following a review

1. For the purposes of Articles 20, 21 and 23 of Regulation (EU) 2024/3015, the lead competent authority shall communicate to the Commission, where applicable, and to the other competent authorities, through the ICSMS forced labour module, the following information on any withdrawal of, or any changes to, a decision adopted pursuant to Article 20 of Regulation (EU) 2024/3015, following a review performed in accordance with Article 21 of that Regulation:
 - (a) a reference to the decision adopted pursuant to Article 20 of Regulation (EU) 2024/3015 that was subject to the review, including information identifying the product(s) subject to the decision and the economic operator(s) to which the decision was addressed, including their name and address of establishment;
 - (b) an electronic copy of its decision taken on the request for review pursuant to Article 21(2) of Regulation (EU) 2024/3015, including any changes to, or withdrawal of, a decision finding a violation, pursuant to Article 21(3) of that Regulation;
 - (c) in case of a judicial review referred to in Article 21(5) of Regulation (EU) 2024/3015, the outcome of such judicial review, including a copy of the corresponding judicial decision, a precise indication on whether the decision adopted pursuant to Article 20 of that Regulation was partially or totally annulled, and a summary of the underlying reasoning;
 - (d) the date on which the withdrawal of the decision, or the changes thereto, take effect.
2. For the purposes of Article 26(5) of Regulation (EU) 2024/2015, the lead competent authority of a Member State shall, following a review performed in accordance with

Article 21 of that Regulation, communicate the withdrawal of, or changes to, a decision adopted pursuant to Article 20 of that Regulation to the following customs authorities, using the following means of communication:

- (a) before the entry into operation of the interconnection referred to in Article 7(3) of Regulation (EU) 2024/3015: to the customs authorities of that Member State, using national protocols to be agreed upon between the lead competent authority and customs authorities of that Member State;
- (b) after the entry into operation of the interconnection referred to in Article 7(3) of Regulation (EU) 2024/3015: to all customs authorities, using the ICSMS forced labour module, from which the withdrawal of, or changes to, such decisions are automatically communicated to the customs risk management environment.

For the purposes of the first subparagraph, point (a), the customs authorities of a Member State to whom the withdrawal of, or changes to, a decision referred to in the first subparagraph, have been communicated through national protocols shall communicate such withdrawal or changes to the customs authorities of the other Member States by registering it in the customs risk management environment referred to in Article 7(2) of Regulation (EU) 2024/3015.

3. Where the Commission acts as the lead competent authority, it shall, until such time as the entry into operation of the interconnection referred to in Article 7(3) of Regulation (EU) 2024/3015, communicate the withdrawal of, or changes to, a decision as referred to in paragraph 2, to customs authorities, by registering it in the customs risk management environment referred to in Article 7(2) of Regulation (EU) 2024/3015.

Article 9

Retention periods of personal data contained in the information communicated in the ICSMS forced labour module

The Commission shall ensure that personal data contained in the information entered in the ICSMS forced labour module and kept in a form that permits the identification of data subjects shall be retained in the ICSMS for 10 years starting from the following events:

- (a) the communication of the closure of a preliminary investigation, as referred to in Article 17(5) and (6) of Regulation (EU) 2024/3015;
- (b) the communication of the closure of an investigation, as referred to in Article 20(3) of Regulation (EU) 2024/3015;
- (c) the communication of a decision on violation, as referred to in Article 20(7) of Regulation (EU) 2024/3015;
- (d) the communication of the withdrawal of, or changes to, a decision establishing a violation of Article 3 of Regulation (EU) 2024/3015 pursuant to Articles 20, 21 and 23 of that Regulation.

The personal data contained in the communications in the ICSMS forced labour module shall be automatically deleted on the last day of the retention period referred to in points (a), (b), (c) and (d).

Article 10

Retention period of personal data of ICSMS users

The Commission shall delete personal data contained in the ICSMS forced labour module relating to a natural person designated by the Commission or a competent authority or a customs authority as ICSMS user not later than one month after it has received the information that the natural person ceased to be an ICSMS user from its services, from the relevant competent authority or the customs authority.

Article 11

Entry into force

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

*For the Commission
The President
Ursula von der Leyen*