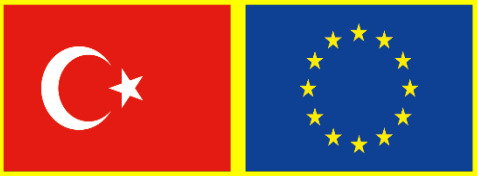

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Technical Assistance for Product Safety in E-Commerce

Project Identification No: NEAR/ANK/2022/EA-RP/0213

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Strategy and Action Plan

Activity 1.4. Strategy and Action Plan Development

August, 2025

Ankara, TÜRKİYE

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PROJECT INFORMATION FORM

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ABBREVIATIONS

Abbreviation	Full Form
AI	Artificial Intelligence
API	Application Programming Interface
CE	Conformité Européenne (European Conformity)
CFCU	Central Finance and Contracts Unit
DSA	Digital Services Act (Regulation (EU) 2022/2065)
DG	Directorate General
e-MS	Market Surveillance in e-commerce
EBYS	Electronic Document Management Systems
EU	European Union
ETBIS	Electronic Trade Information System
GPSD	General Product Safety Directive (2001/95/EC)
GPSR	General Product Safety Regulation (EU) 2023/988
ICSMS	Information and Communication System for Market Surveillance
IP	Internet Protocol
IT	Information Technology
MERSIS	Central Registration System (Merkezi Sicil Kayıt Sistemi)
ML	Machine Learning
MoT	Ministry of Trade
MoU	Memorandum of Understanding
MS	Market Surveillance
MSA	Market Surveillance Authority
NAR	Needs Analysis Report
NRAM	National Risk Assessment Methodology
PGDBIS	Market Surveillance Information System
PGDKK	Market Surveillance Coordination Board
RAPEX	Rapid Alert System for Dangerous Non-Food Products (New Safety Gate)
SAPR	Strategy and Action Plan Report
SME	Small and Medium Size Enterprise
SOP	Standard Operating Procedure
TAREKS	Foreign Trade Risk-Based Import Control System
UI	User Interface

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DEFINITIONS

For the purposes of this document, the terms below shall have the following meaning:

- “online platforms”: Electronic commerce intermediary service providers / Electronic commerce service provider, online marketplace
- “digital commerce or digital market”: e-commerce
- "electronic commerce”: All kinds of economic and commercial activities carried out online in electronic environment without physical confrontation

1 EXECUTIVE SUMMARY

The **Strategy and Action Plan Report (SAPR)** provides a forward-looking framework for transforming Türkiye's market surveillance (MS) system so that it is capable of protecting consumers effectively in an increasingly digitalized, globalized, and fast-moving market environment. The SAPR responds directly to the exponential growth of e-commerce, the diversification of sales channels, and the rise in cross-border product flows, all of which present new regulatory, technical, and institutional challenges for ensuring product safety.

This transformation is not only a national imperative but also a strategic necessity in Türkiye's EU accession process. The SAPR is anchored in the requirements of the **General Product Safety Regulation (GPSR, EU) 2023/988** and the **Digital Services Act (DSA, EU) 2022/2065**, which set out higher standards for online market oversight, transparency, and risk management.

The SAPR is fully aligned with the **Overall Objectives** of the project:

- **To improve the health and safety of consumers in line with EU product safety rules.**
- **To improve Türkiye's accession progress in the area of product safety.**

It also advances the **Specific Objective**:

- **Market surveillance activities are carried out both in electronic and physical markets more effectively.**

Key Insights from the Needs Analysis

The Needs Analysis and stakeholder consultations identified a combination of systemic gaps and operational constraints that hinder the full effectiveness of Türkiye's current MS model:

- **Regulatory gaps**: Existing legal provisions do not sufficiently address the specificities of online marketplaces, cross-border sellers, or platform obligations in product safety.
- **Institutional fragmentation**: Multiple Market Surveillance Authorities (MSAs) operate without fully integrated data-sharing systems, limiting timely risk detection and coordinated enforcement.
- **Limited digital enforcement tools**: The absence of a dedicated e-MS platform, automated monitoring functions, and AI-supported risk targeting reduces the efficiency and coverage of online inspections.
- **Capacity constraints**: A shortage of specialized staff with IT, data analysis, and digital inspection expertise slows the shift towards proactive, risk-based approaches.
- **Stakeholder engagement challenges**: Platforms, SMEs, and consumer organizations are not yet systematically involved in joint compliance and awareness-raising efforts.

Strategic Approach - Six Pillars

In response, the SAPR sets out a coherent strategy built on **six mutually reinforcing pillars**, designed to address immediate needs while building a sustainable, future-ready system:

1. **Legal Harmonization** - Establishing a fully EU-aligned legal framework that provides clear powers for e-MS activities, including mystery shopping, automated monitoring, and proportionate sanctions. This includes revising primary and secondary legislation to define

platform obligations, cross-border cooperation rules, and evidence admissibility in digital inspections.

2. **IT Tool Development & Integration** - Developing a national e-MS platform that consolidates monitoring, case management, and analytics in one system. This platform will interconnect with national databases (ETBIS, MERSIS, PGDBIS, TAREKS) and enable structured, secure data exchange with platforms. Future-proofing through modular design will allow scaling for new technologies such as social media scanning and image recognition.
3. **Risk-Based Surveillance & Analytics** - Designing and implementing a national **risk assessment methodology** that enables MSAs to prioritize inspections based on product, seller, and channel risk. This will integrate AI/ML analytics, seasonal trend detection, and systematic use of consumer complaints and **cross-border product safety alert networks** to anticipate and respond to emerging threats.
4. **Institutional Capacity Building** - Strengthening governance and coordination mechanisms between MSAs, the Ministry of Trade, PGDKK, and other stakeholders. This includes clarifying mandates, defining SOPs, setting performance targets, and establishing regular coordination forums for e-MS operations.
5. **Human Resources & Training** - Expanding and diversifying the skills base by defining e-MS-specific job descriptions, recruiting IT specialists, data scientists, and risk analysts, and delivering tailored training programmes. A "train-the-trainer" model will ensure sustainable capacity building across institutions.
6. **Awareness Raising & Stakeholder Cooperation** - Establishing structured cooperation channels with online platforms, seller networks, and consumer organizations. Public awareness campaigns will inform consumers about safe purchasing practices and reporting channels, while targeted outreach will guide SMEs and sellers on compliance obligations.

From Strategy to Action

The **Action Plan** (Section 10) operationalizes the six pillars through **53 measures**, sequenced into short-, medium-, and long-term actions, and mapped against responsible bodies, dependencies, and KPIs. Immediate priorities include:

- Completing the legal gap analysis and drafting priority amendments for GPSR and DSA alignment.
- Finalizing and piloting the national risk assessment methodology.
- Launching e-MS platform development and initial integrations.
- Delivering targeted role-specific training to inspectors, analysts, and platform compliance staff.
- Initiating consumer information campaigns and platform cooperation protocols.

Expected Outcomes

By the conclusion of the SAPR implementation period, Türkiye will have:

- A fully operational, EU-aligned e-MS system capable of real-time monitoring and enforcement.
- A harmonized legal framework addressing the full spectrum of product safety risks in online and offline markets.
- Enhanced institutional coordination and clarity of roles across all MSAs.
- Expanded human capacity with specialized skills in digital enforcement and risk-based regulation.

- Stronger engagement of platforms, sellers, and consumers in a shared responsibility model for product safety.

Collectively, these outcomes will deliver a modern, resilient market surveillance system that protects consumers, strengthens trust in the marketplace, and accelerates Türkiye's progress towards EU accession in the area of product safety.

2 INTRODUCTION

2.1 Purpose of the Report

The **Strategy and Action Plan Report (SAPR)** is the blueprint for strengthening Türkiye's capacity to conduct **market surveillance in e-commerce**. It is designed to ensure that products offered to consumers via online channels are safe, compliant, and traceable, in line with EU product safety rules and best practices.

E-commerce presents unique challenges: products can be offered from anywhere in the world, listed across multiple platforms, and purchased by consumers within minutes. Traditional inspection models, designed for physical markets, are no longer sufficient to keep pace with this speed and scale. The SAPR sets out a clear strategy for adapting Türkiye's market surveillance system to the **digital marketplace**, while ensuring that improvements benefit oversight in physical markets as well.

The purpose of the SAPR is to:

- **Define a strategic pathway** for aligning Türkiye's e-commerce market surveillance with EU requirements, particularly the **General Product Safety Regulation (GPSR)** and **Digital Services Act (DSA)**.
- **Translate strategic priorities into operational measures** through a sequenced Action Plan.
- **Provide a coordination tool** for all stakeholders involved in online product safety, from ministries and enforcement bodies to platforms and consumer organizations.

2.2 Scope and Objectives

The SAPR focuses primarily on **market surveillance in e-commerce** - monitoring, inspecting, and enforcing product safety requirements in the online environment. It addresses:

- **Legal provisions** for platform obligations, online inspection methods, and enforcement powers.
- **Digital monitoring tools** to track products, sellers, and compliance trends across platforms.
- **Risk assessment methodologies** tailored for online sales channels, enabling targeted inspections.
- **Institutional structures** for cooperation between MSAs and the Ministry of Trade, under coordination bodies such as PGDKK.
- **Skills and resources** needed for effective e-MS operations.
- **Stakeholder engagement** with platforms, sellers, and consumers to improve compliance and reporting.

Although the emphasis is on e-commerce, many of the measures - particularly those related to capacity building, training, and legal harmonization - will also strengthen market surveillance in **physical markets**, ensuring consistency across all sales channels.

2.3 Context and Problem Statement

The Rise of E-Commerce in Türkiye

Türkiye's e-commerce sector has experienced double-digit annual growth over the past decade, with millions of transactions taking place daily across domestic and cross-border platforms. This growth has brought:

- **Increased consumer choice**, with products from a wide range of suppliers and geographies.
- **Faster product turnover**, meaning unsafe products can easily reach consumers before being detected.
- **Greater complexity in enforcement**, as sellers may be based abroad, use multiple platforms, and operate with minimal physical infrastructure.

Current Gaps in E-Commerce Market Surveillance

The Needs Analysis highlighted that Türkiye's current MS model was built primarily around physical market inspections. While progress has been made in developing electronic systems for trade registration and product tracking, there are critical gaps in e-commerce oversight:

- **Insufficient legal basis** for imposing obligations on e-platforms and conducting covert online inspections such as mystery shopping.
- **Fragmented data systems** that make it difficult to consolidate intelligence from e-platforms, consumer complaints, and other authorities.
- **Limited technological tools** for automated product screening, data mining, and AI-supported risk targeting.
- **Skills shortages** in digital investigation, data analysis, and cross-border enforcement cooperation.

EU Alignment as a Driver of Change

The EU's **GPSR** requires that online marketplaces cooperate with market surveillance authorities, swiftly remove unsafe products, and ensure that accurate product information is visible to consumers. The **DSA** complements this by setting obligations for online intermediaries, including risk assessments, reporting, and consumer protection mechanisms. Aligning with these frameworks is essential both for **consumer safety** and for advancing Türkiye's **EU accession objectives**.

Role of the SAPR

The SAPR bridges the gap between diagnosis and action. In this respect, it:

- identifies the reforms needed to make Türkiye's e-commerce market surveillance **proactive, data-driven, and internationally interoperable**;
- sequences these reforms into **practical, time-bound measures** with clear responsibilities;
- provides a **common reference point** for all stakeholders to align on priorities and coordinate their efforts.

In short, the SAPR provides a **clear, evidence-based plan** for evolving from traditional inspection models to a **modern, integrated, and EU-aligned e-commerce market surveillance system**.

3 CONTEXT AND PROBLEM STATEMENT

3.1 Growth of e-commerce in Türkiye and implications for Market Surveillance

Over the past decade, **Türkiye's e-commerce sector has evolved from a niche channel to a dominant force in retail trade**. This transformation has been fueled by rapid digitalization, increased internet and smartphone penetration, changing consumer preferences, and competitive logistics solutions. The result is a market in which **millions of transactions occur daily**, involving both domestic and foreign sellers, and spanning an enormous variety of product categories, from children's toys to electrical appliances, cosmetics, and food supplements.

The pace of this growth has been extraordinary. Between 2019 and 2024, online sales more than tripled in monetary value, with the share of e-commerce in total retail sales reaching record highs. This acceleration is not expected to slow; global trends suggest that the digital marketplace will continue expanding its share at the expense of traditional physical retail.

While this offers consumers greater choice, convenience, and competitive prices, it also **fundamentally changes the enforcement landscape for product safety authorities**. In traditional markets, inspections take place at fixed locations - ports, warehouses, shops - and are tied to physical supply chains. In e-commerce, however:

- Sellers can be based anywhere in the world, often without a physical presence in Türkiye.
- Products can appear on multiple online platforms simultaneously, under varying names and descriptions.
- Listings can be created, modified, or removed in minutes - faster than traditional inspection workflows can operate.

These dynamics compress the **window of opportunity for intervention**. A non-compliant product may be offered for sale, purchased, and delivered before an inspector has even identified it as a risk. For enforcement to remain effective, market surveillance must shift from **reactive, location-based inspections** to **proactive, technology-enabled monitoring** capable of keeping pace with digital trade.

3.2 Current E-Commerce Market Surveillance Model and Its Limitations

Türkiye's market surveillance system - while robust in traditional sectors - is still **transitioning into the digital age**. The Ministry of Trade provides overall policy direction, and various Market Surveillance Authorities conduct inspections in their respective product areas. Coordination is supported by the **Market Surveillance Coordination Board**.

For e-commerce, authorities have begun adapting existing systems, such as **ETBIS**, **MERSİS**, **PGDBIS**, and **TAREKS**. However, these tools were **not originally designed for continuous, automated monitoring of online marketplaces**. Instead, they are used in parallel, without full interoperability or real-time data sharing.

The operational model for e-MS currently relies heavily on **manual web searches** and ad-hoc monitoring of platforms. Inspectors identify suspicious listings individually, verify product details, and

follow up with enforcement measures. While effective in some high-priority cases, this method is **resource-intensive, slow, and incapable of scaling to match the volume of e-commerce activity**.

Furthermore, institutional mandates for digital enforcement are not always clear. Overlapping roles can create uncertainty about **which authority is responsible for specific cases**, particularly when listings involve multiple risk categories (e.g., an electronic toy that is both an electrical product and a child's product). This fragmentation leads to inconsistent practices and reduces enforcement efficiency.

3.3 Legal Gaps Hindering Digital Enforcement

Legal provisions remain **a critical bottleneck** for scaling up e-commerce market surveillance. The Needs Analysis identified several key areas where the legal framework does not fully support digital operations:

- **Platform obligations**: Current laws do not impose strong, enforceable duties on online marketplaces to verify product compliance, share structured data with authorities, or proactively remove unsafe products.
- **Covert inspection tools**: Methods such as **mystery shopping** - purchasing products online to test their safety and verify compliance - are not explicitly regulated, creating uncertainty over their admissibility as evidence.
- **Digital evidence handling**: Procedures for collecting, preserving, and using digital evidence in enforcement cases are not fully standardized.
- **Cross-border cooperation**: While Türkiye participates in some international safety information exchanges, there is no fully integrated mechanism for **real-time alerts** involving foreign platforms or sellers.

Without these legal foundations, authorities cannot systematically compel cooperation, obtain timely data, or conduct the full range of online-specific inspection activities needed for effective risk mitigation.

3.4 Data and Technology Constraints

Even where legal powers exist, **technical limitations** slow down enforcement. Existing systems such as ETBIS, MERSİS, PGDBIS, and TAREKS contain valuable data, but they suffer from lack of cross-functional collaboration. For example:

- ETBIS provides information on registered e-commerce businesses but does not integrate directly with inspection records.
- MERSİS tracks business registrations but is not automatically cross-referenced with product listings.
- PGDBIS contains product safety data but lacks automated links to platform listing information.

Because these systems are not yet connected, inspectors must manually cross-check data, which increases the workload and delays interventions. Moreover, the current monitoring process lacks **automated product scanning tools** - such as algorithms that can detect restricted terms, missing safety warnings, or high-risk product categories in real time.

This means Türkiye's e-MS operations are **reactive rather than proactive**, relying on sporadic detection rather than continuous surveillance. For a high-volume, fast-moving digital market, this approach leaves significant gaps in consumer protection.

3.5 Human Capacity Gaps

Effective e-MS requires **a new skill set** that blends traditional inspection expertise with digital competencies. The Needs Analysis revealed that many inspectors are highly skilled in physical inspections but have had limited training in:

- Digital investigation techniques (e.g., online seller tracing, IP analysis).
- Data analytics for trend and risk detection.
- Use of automated monitoring tools and AI-assisted screening.

Capacity gaps are particularly acute at the **provincial level**, where resources are more limited and staff often face competing demands. Without targeted training and dedicated digital investigation roles, the ability to identify and act on online risks will remain constrained.

3.6 EU Alignment Drivers: GPSR and DSA

The **EU General Product Safety Regulation (2023/988)** and the **Digital Services Act (2022/2065)** significantly raise the expectations for how online marketplaces operate and cooperate with authorities. Under the GPSR, platforms must:

- Act swiftly to remove unsafe products once notified.
- Ensure traceability of products and sellers.
- Cooperate with market surveillance authorities through structured, secured data sharing.

The DSA reinforces these obligations by requiring **due diligence**, **risk assessments**, and **transparent reporting** from online intermediaries. For Türkiye, aligning with these requirements is not only an EU accession obligation but also a **practical necessity** to ensure domestic enforcement can match the speed and scale of online trade.

3.7 Stakeholder Landscape

A successful e-MS system depends on coordinated action among a diverse set of actors:

- **Ministry of Trade (MoT)** - Leads policymaking, legislative reform, and coordination across agencies; manages key national systems.
- **Market Surveillance Authorities (MSAs)** - Enforce compliance in their product areas, requiring clear mandates for digital inspections.
- **PGDKK** - Lead by MoT, the Board coordinates inter-agency strategies; needs enhanced capacity to address digital-specific risks.
- **Online platforms** - Gatekeepers for e-commerce; must become proactive partners in ensuring compliance.
- **Consumer organizations** - Essential for gathering risk intelligence through complaints and raising public awareness.

3.8 Why Action is Urgent

The evidence is clear: e-commerce is growing faster than the systems designed to regulate it. Without decisive action:

- Non-conforming and unsafe products will continue to slip through enforcement gaps.
- Consumer trust in online marketplaces may erode.
- Türkiye's ability to align with EU standards will be delayed, with potential consequences for market access and accession progress.

The **SAPR responds to this urgency** by mapping a **comprehensive, time-bound set of reforms** across legal, technical, institutional, and human capacity dimensions - ensuring that Türkiye's market surveillance system is fit for purpose in the **digital era**.

4 METHODOLOGY FOR THE SAPR

Designing the **Strategy and Action Plan Report (SAPR)** for Türkiye's e-commerce market surveillance required more than a technical checklist. It demanded a **carefully staged process** that could translate a complex set of challenges - spanning legal gaps, institutional fragmentation, technology constraints, and evolving market dynamics - into a **coherent, implementable roadmap**.

The methodology was built around **three overarching principles**:

1. **Comprehensiveness** - capturing every element of the e-MS ecosystem, from legislation and institutions to IT tools, human capacity, and public awareness.
2. **Evidence-based design** - grounding recommendations in data, legal analysis, and lived operational experience.
3. **Stakeholder ownership** - ensuring those who must implement the strategy helped shape it, making it realistic and politically sustainable.

This approach recognizes that **market surveillance in e-commerce is not a simple extension of traditional inspection**. It is a **transformation** - in tools, processes, and culture - that can only succeed if planned with precision and clearly defined ownership.

4.1 Building a Robust Evidence Base

The first methodological step was to **understand the current reality** in depth. The SAPR therefore rests on a triangulated evidence base, where each source provided complementary insights.

Needs Analysis Report (NAR)

The NAR offered the most comprehensive baseline assessment of Türkiye's market surveillance system in the digital era. It dissected the legislative framework, institutional structures, inspection practices, IT capabilities, and human resources relevant to e-commerce.
For example:

- It mapped how ETBIS, MERSİS, PGDBIS, and TAREKS operate **in parallel rather than as an integrated ecosystem**, highlighting the need for interoperability.
- It documented **specific legal voids** (e.g., no clear mandate for covert online inspections) and the consequences for operational reach.
- It identified **institutional bottlenecks**, including unclear division of roles for cross-sector online cases.

Needs Analysis Workshop

The workshop acted as the **reality check** for the baseline findings. It gathered representatives from the Ministry of Trade, sectoral MSAs, e-platforms, and consumer organizations in a facilitated setting where they could:

- **Confirm or challenge** the NAR's conclusions.
- **Prioritize challenges** - for example, deciding whether IT integration or legal reform should come first for certain measures.

- Share **practical obstacles** inspectors face online, from tracing anonymous sellers to preserving digital evidence.

The workshop was not just a validation exercise - it was a **co-creation space** where potential solutions began to take shape.

Legal Analysis

This stream of work focused on comparing Türkiye's legal framework with the EU's **General Product Safety Regulation (GPSR)** and **Digital Services Act (DSA)**. The review:

- Mapped **every relevant article** against Türkiye's laws to identify partial or non-alignment.
- Flagged **operational dependencies** - e.g., the ability to integrate platform data into a central e-MS IT tool hinges on legal provisions that compel platforms to share such data.
- Prioritized **quick-win reforms**[1] that could unlock broader transformation.

International and EU Best Practice Review

Finally, the methodology looked outward, analyzing how other jurisdictions - including EU Member States - have built **digital-first market surveillance systems**. This exercise was not about importing solutions wholesale but **identifying what works elsewhere and adapting it to Türkiye's institutional and legal landscape**. Examples examined included:

- Automated product listing crawlers that detect risky items based on keywords, images, or seller history.
- Structured cooperation agreements between authorities and major platforms, with clear data formats and response deadlines.
- National risk scoring models that combine consumer complaints, marketplace data, and cross-border alerts.

4.2 Deep and Inclusive Stakeholder Engagement

Because **e-commerce enforcement is a shared responsibility**, the SAPR's credibility depends on the involvement of every actor in the ecosystem. The stakeholder engagement process was therefore **continuous and layered**, not limited to a single consultation stage.

- **Institutional stakeholders** (MoT and MSAs) were engaged through both strategic discussions and technical working groups, ensuring high-level policy alignment and operational feasibility.
- **Economic operators** (online platforms, manufacturers, industry associations, logistics providers) contributed practical insights into how products are listed, promoted, and delivered - critical for designing realistic data-sharing protocols.
- **Consumer organizations** brought in the **public perspective**, ensuring that complaint-handling processes and awareness campaigns address real safety concerns.

The engagement methods were varied to match the nature of the input required:

- **Bilateral meetings** allowed sensitive or agency-specific issues to be explored in depth.

[1] Reforms which can be performed relatively fast and with a minimum of costs, like appointing inspectors only for e-MS, training them, clear SOPs, guidance documents etc

- **Thematic workshops** grouped participants by topic - legal reform, IT systems, or risk-based surveillance - to encourage focused, technical debate.
- **Iterative feedback cycles** on draft recommendations ensured stakeholders could shape the final plan, not just react to it.

This approach meant the SAPR's proposals were **stress-tested against real-world constraints** before being finalized.

4.3 Analytical Process: From Problem to Action

At the heart of the methodology was a **problem-to-solution logic** that ensured recommendations were both targeted and actionable.

1. **Diagnose** the problem - using NAR findings, workshop discussions, and legal review.
2. **Define** the strategic objective - the desired end state for that problem area.
3. **Design** potential measures - drawing from international models and adapting them to Türkiye.
4. **Test feasibility** - considering legal, institutional, technical, and financial realities.
5. **Sequence** actions in the correct order - recognizing that some measures unlock others (e.g., passing a platform data-sharing law before integrating IT systems).
6. **Assign** clear responsibility - identifying the lead and supporting institutions for each action.
7. **Specify** measurable outputs - ensuring progress can be tracked and evaluated.

This stepwise process allowed the SAPR to function not only as a strategy but as a **practical workplan**.

4.4 Managing Assumptions, Constraints, and Dependencies

The methodology explicitly addressed factors that could affect implementation:

Assumptions

- Political commitment to e-MS reform will be sustained.
- E-platforms will engage constructively once legal frameworks are in place.
- Adequate budgetary resources will be allocated for IT, training, and public engagement.

Constraints

- Varying levels of technical readiness among MSAs.
- Potential delays in legislative drafting and parliamentary approval.
- Differences in willingness to share data, especially from foreign e-platforms.

Dependencies

- The e-MS IT platform depends on legal powers for data exchange and digital evidence use.
- Risk-based surveillance requires unified data from complaints, e-platforms, and cross-border product safety alert networks.

Public awareness will be most effective if launched alongside visible enforcement successes.

4.5 Guiding Methodological Principles

From the outset, the SAPR development was guided by principles that ensured both ambition and practicality:

1. **Evidence-driven** - no recommendation without a factual or analytical basis.
2. **EU acquis alignment** - every measure contributes to meeting GPSR and DSA obligations.
3. **Operational realism** - recommendations reflect the current institutional context and resource levels.
4. **Future-proofing** - anticipating technological and market changes, such as AI-based listing generation or cross-platform seller networks.

4.6 Outcome of the Methodology

The result of this methodical approach is an **Action Plan that is implementable from day one**. It balances **quick-win reforms** with **longer-term capacity building**, sequences actions to avoid bottlenecks, and assigns responsibilities clearly. Most importantly, it is a product of **shared design** - increasing the likelihood that stakeholders will commit to delivering it in practice.

5 LEGAL HARMONIZATION (PILLAR 1)

5.1 The Central Role of Law in E-Commerce Market Surveillance

Market surveillance is, at its core, an **exercise of public authority**. Inspectors, analysts, and enforcement bodies can only act to protect consumers if they have **clear, enforceable legal powers** and if economic operators have **explicit, binding obligations** to comply with.

In the traditional marketplace, these legal powers have long been established: inspectors can visit shops, seize unsafe goods, order recalls, and penalize non-compliant producers or distributors. However, in the **borderless, fast-moving world of e-commerce**, many of these powers **do not automatically translate**.

An unsafe children's toy sold in a physical shop is a static target - it can be inspected, tested, and removed. The same toy in an online listing may disappear and reappear multiple times in different forms, across different e-platforms, possibly hosted abroad. If the law does not explicitly **require e-platforms to prevent, detect, and remove unsafe products**, or does not **authorize inspectors to conduct covert online investigations**, then enforcement becomes a "hide-and-seek" game that authorities rarely win.

For this reason, **Pillar 1 – Legal Harmonization** is the foundation upon which every other pillar of the SAPR depends. Without it:

- Pillar 2's IT systems will lack lawful access to the data they need.
- Pillar 3's risk-based analytics will be starved of critical inputs.
- Institutional cooperation under Pillar 4 will stall in the absence of defined responsibilities and data-sharing mandates.

Legal reform is not just a compliance exercise for EU accession - it is the **enabler of an entirely new enforcement model** for the digital marketplace.

5.2 The EU GPSR and DSA: Why They Matter for Türkiye

Two EU legal instruments shape the future of e-commerce market surveillance in Europe: the **General Product Safety Regulation (GPSR)** and the **Digital Services Act (DSA)**. Together, they shift the regulatory mindset from **reactive enforcement** to **proactive, shared responsibility** between authorities and online intermediaries.

Under the GPSR:

- Online marketplaces must act quickly - sometimes within 2 working days — to remove unsafe products once notified.
- They must ensure the **traceability** of sellers and products, so authorities can locate responsible economic operators.
- They must cooperate through **structured, secure, and timely data-sharing mechanisms**.

Under the DSA:

- Platforms must conduct **risk assessments** and put in place measures to mitigate risks to consumer safety.

- Large platforms are subject to **enhanced transparency requirements**, including regular public reporting on content moderation and product removal.

For Türkiye, aligning with these obligations achieves two things at once:

1. It fulfils core EU accession requirements.
2. It equips the national system with **modern enforcement tools** to match the speed, scale, and complexity of digital commerce.

5.3 Legal Gaps and Their Real-World Impact

The Needs Analysis and targeted legal review revealed that while Türkiye's product safety law (Law No. 7223) is strong in the physical market, it **lacks several online-specific powers and duties** that are standard in the EU.

Gap 1 – Limited platform obligations

At present, online marketplaces in Türkiye are not legally obliged to:

- Verify product compliance before listings go live.
- Remove unsafe products proactively, even if similar listings have been found unsafe before.
- Share structured seller and product data in a standard format with authorities.

This means that even when unsafe products are identified, **they can reappear within days under new listings**.

Gap 2 – No clear mandate for covert online inspections

Mystery shopping - buying products online for testing - is not explicitly regulated. Without this legal backing:

- Authorities risk having enforcement cases challenged on procedural grounds.
- Inspectors cannot confidently act undercover to identify hidden non-compliance.

Gap 3 – Weak legal basis for digital evidence

Online enforcement often depends on screenshots, product page captures, or transaction records. Without a clear legal framework for how such evidence is collected, stored, and authenticated, its **admissibility can be questioned**.

Gap 4 – Limited cross-border cooperation powers

When a seller is based abroad, current law does not provide strong, rapid-response mechanisms for **real-time data exchange** with foreign regulators - even if that seller is repeatedly placing unsafe products on the Turkish market.

Gap 5 – No explicit framework for IT system interoperability

Existing systems (ETBIS, MERSİS, PGDBIS, TAREKS) store valuable data, but the law does not fully define access rights, data flows, and security safeguards for automated, integrated use in e-MS.

5.4 The Reform Vision for Pillar 1

Legal harmonization under Pillar 1 is designed to:

- **Fully align** Türkiye's e-MS legislation with the relevant articles of the GPSR and DSA requirements.
- **Empower** market surveillance authorities with modern, digital-first enforcement powers.
- **Establish** the legal scaffolding for system integration, data exchange, and international cooperation.

This is not simply about "changing the text of the law" - it is about **changing the scope of what market surveillance can do**. With the right provisions in place, inspectors could:

- Automatically receive data feeds from platforms showing seller identities, sales volumes, and flagged high-risk listings.
- Conduct mystery shopping legally, knowing results will hold up in court.
- Share urgent safety alerts with foreign regulators the same day they arise.

5.5 Priority Legal Actions

Based on the Needs Analysis Report findings, the SAPR proposes a **sequenced package of reforms**:

1. **Amend Law No. 7223** to introduce:
   - Explicit duties for online platforms to verify compliance and remove unsafe listings within strict deadlines.
   - Proportional penalties based on turnover for failure to comply, as per EU models.
   - Obligations to share structured, standardized seller/product data with authorities.
2. **Legally authorize covert digital inspections**:
   - Define scope, safeguards, and admissibility rules for mystery shopping in e-commerce.
   - Allow inspectors to act as regular consumers without prior notification to sellers.
3. **Create a legal framework for digital evidence**:
   - Specify acceptable formats (screenshots, logs, transaction data) and metadata requirements.
   - Standardize preservation and authentication processes across agencies.
4. **Legislate for platform data-sharing protocols**:
   - Require platforms to provide real-time or periodic data feeds to MSAs.
   - Cover both domestic and foreign-based platforms selling into Türkiye.
5. **Enable cross-border enforcement cooperation:**
   - Establish rapid-alert and evidence-sharing powers with EU and non-EU regulators.
   - Prepare for participation in **cross-border product safety alert networks**.

5.6 Dependencies and Sequencing

Legal measures must come **before** or **in parallel with** technical development. For example:

- Without legal authority to obtain platform data, Pillar 2's IT tools will not have the inputs they need.
- Without admissibility rules for digital evidence, Pillar 3's risk-based inspections will be weakened in court.

Therefore, **the first 12–18 months** of SAPR implementation should prioritize the adoption of key legal reforms, ensuring that Pillars 2–6 can proceed without delay.

5.7 Risks and Mitigation

Reforming the law in sensitive areas - such as platform obligations and data exchange - can face resistance. To mitigate risks:

- Engage parliamentary committees early to build consensus on EU alignment benefits.
- Consult platforms during drafting to clarify obligations and reduce implementation friction.
- Embed transparency and due process safeguards in the law to address data protection and competition concerns.

5.8 Expected Impact of Pillar 1

When Pillar 1 reforms are in place, Türkiye will:

- Have a **GPSR/DSA-aligned legal framework** capable of managing modern e-commerce risks.
- Equip authorities with **digital-first enforcement powers**.
- Lay the legal foundations for the technical, analytical, institutional, and public-facing reforms in the rest of the SAPR.

In short, Pillar 1 will move Türkiye from **reactive enforcement in e-commerce** to a **proactive, preventive, and technology-enabled model** - one that protects consumers more effectively while positioning the country as an active, trusted participant in the EU's product safety ecosystem.

6 IT TOOL DEVELOPMENT AND INTEGRATION (PILLAR 2)

6.1 Why Digital Tools are No Longer Optional

In the physical marketplace, an inspector can walk into a shop, scan shelves, pick up a product, and decide on the spot whether it should be tested or withdrawn. In the online marketplace, this is **impossible without technology**.

A single large e-commerce platform in Türkiye can host **millions of active listings**, updated continuously by thousands of sellers. These listings are not static - they change names, images, and descriptions; they may disappear and reappear; and they can be hosted by foreign-based sellers far beyond the reach of physical inspections.

If Türkiye's market surveillance authorities tried to monitor this ecosystem manually, they would always be **ten steps behind**. By the time an inspector identifies a dangerous toy online, that listing may already have been purchased hundreds of times, or reappeared under a new seller name.

Pillar 2 recognizes this reality: **the fight for product safety in e-commerce is a data fight**. In order to win this fight, authorities need **a central, technology-enabled tool,** that can see across the digital marketplace in real time, flag risks instantly, and feed actionable intelligence directly to inspectors.

6.2 The Current Landscape: Valuable Systems, but Silos Remain

Türkiye already has several well-developed digital systems that can support e-commerce market surveillance:

- **ETBIS** - Registers e-commerce businesses and collects basic operational data, including the nature of their activities and sector classification.
- **MERSİS** - Stores official trade registry details, including ownership and corporate history.
- **PGDBIS** - Maintains inspection results, non-compliance records, and product safety information.
- **TAREKS** - Screens imports for safety risks, using a risk-based approach.

Each of these systems holds a **piece of the puzzle**. The problem is that they are **not connected in a way that supports proactive, online surveillance**. An inspector who spots a suspicious listing online currently has to:

1. Check ETBIS to see if the seller is registered.
2. Look up MERSİS for ownership details.
3. Search PGDBIS to see if the product or seller has a compliance history.
4. Possibly check TAREKS for import-related risks.

This manual, multi-system process is slow and inefficient. Worse, it means that **no automated "early warning" is possible** - the systems do not "talk" to each other in real time.

6.3 The Vision: A Unified e-MS IT Platform

Pillar 2 proposes the creation of a **unified, centralized e-MS IT platform** - the **digital backbone** of Türkiye's modernized market surveillance system. This platform will:

- **Ingest** data from multiple sources - national databases, online marketplaces, consumer complaints, and **cross-border product safety alert networks**.
- **Analyze** this data using automated rules and advanced analytics.
- **Alert** inspectors when risk thresholds are exceeded.
- **Manage** cases from initial detection through to enforcement and follow-up.

This is not just an internal database - it is a **live, operational tool** for daily market surveillance. In practical terms, this means:

- If an unsafe electrical appliance is detected at import (via TAREKS), the platform will **immediately flag all identical or similar listings** in online marketplaces, triggering removal requests before consumers are harmed.
- If a product recall is issued in another country (via cross-border alerts), the system will **search Turkish platforms** for matching listings and generate urgent alerts to inspectors.
- If a seller repeatedly lists non-compliant goods, the platform will **prioritize them in the risk scoring model**, enabling targeted enforcement.

6.4 Key Functionalities and How They Change Operations

The unified platform will have several core modules:

1. **Automated Marketplace Monitoring**
    - Using crawlers and AI image recognition to scan millions of listings daily.
    - Flagging products based on keywords, visual similarities, or known non-compliance patterns.

    Example: A crawler detects multiple listings of a toy model banned in the EU; the system alerts inspectors and automatically sends platform removal requests.

2. **Real-Time Data Feeds from Platforms**
    - Enabled by Pillar 1's legal requirements for structured data sharing.
    - Data includes seller IDs, product descriptions, compliance documentation, and sales figures.
    - This allows **continuous oversight** rather than sporadic inspections.
3. **Cross-System Matching**
    - Automatically linking ETBIS registration data with MERSİS ownership records, PGDBIS compliance history, and TAREKS import data.

    Example: A seller's import record shows repeated unsafe shipments; the system raises their risk score for all online listings.

4. **Integrated Case Management**
    - Inspectors can open, assign, and track cases directly in the platform.

- All actions (e.g., inspections, platform takedown requests, test results) are logged in one place.

5. **Digital Evidence Preservation**
   - Automated capture of screenshots, metadata, and transaction data in legally admissible formats.
   - Protects the integrity of evidence for administrative and judicial proceedings.

6.5 Making Interoperability a Reality

True interoperability means **data moves without friction**. The platform will be built on secure APIs allowing:

- **ETBIS ↔ PGDBIS**: linking seller identity with compliance history.
- **TAREKS ↔ e-MS Platform**: automatically generating online surveillance tasks for risky imports.
- **MERSİS ↔ e-MS Platform**: providing instant ownership verification for sellers.
- **Platform APIs ↔ e-MS Platform**: ensuring up-to-date listing and sales data.

This requires more than just technical coding - it also depends on **legal clarity** (from Pillar 1) and **institutional agreements** (from Pillar 4) to define who owns, manages, and accesses the data.

6.6 Development Phases: From Foundations to Full Capability

Because this is a complex, multi-source integration, the SAPR proposes a **phased development**:

- **Phase 1 – Foundations**
  - Connect ETBIS, PGDBIS, and MERSİS.
  - Deploy a basic crawler to support inspectors in identifying high-risk listings.
  - Begin manual evidence preservation functions.
- **Phase 2 – Risk Scoring and Semi-Automation**
  - Embed the national risk assessment methodology from Pillar 3 into the platform.
  - Start automated alert generation for high-risk products and sellers.
  - Pilot platform API integration with selected marketplaces.
- **Phase 3 – Full Automation and International Connectivity**
  - Expand to all major platforms, with real-time data feeds.
  - Connect to **international safety alert networks** for instant risk propagation.
  - Deploy AI-driven image recognition and predictive analytics to spot emerging threats.

6.7 Dependencies with Other Pillars

The platform will only achieve its full potential if:

- **Pillar 1** provides legal powers for platform data access and digital evidence use.
- **Pillar 3** supplies a robust risk-scoring methodology to embed into analytics.
- **Pillar 4** ensures institutions have mandates and coordination mechanisms for shared system use.

- **Pillar 5** delivers training so inspectors can use the platform effectively.
- **Pillar 6** leverages public reporting tools to channel consumer alerts directly into the system.

6.8 Risks and Mitigation

- **Risk**: Low platform cooperation in data sharing.
- **Mitigation**: Binding legal obligations (Pillar 1) and phased technical onboarding.

- **Risk**: Data overload without effective filtering.
- **Mitigation**: Risk-based analytics (Pillar 3) to focus on high-priority cases.

- **Risk**: Institutional reluctance to change workflows.
- **Mitigation**: Early engagement, pilot projects, and visible quick wins.

6.9 Expected Transformation

Once operational, the unified e-MS IT platform will fundamentally **change the way market surveillance is done** in Türkiye. Instead of reacting to consumer complaints and ad-hoc inspections, authorities will operate a **continuous, nationwide, intelligence-led monitoring system**. Unsafe products will be detected and removed faster, repeat offenders will be systematically identified, and Türkiye will be able to participate as an **equal partner** in cross-border safety cooperation.

In essence, Pillar 2 turns the legal powers of Pillar 1 into **daily operational reality** - and gives Türkiye the technological capacity to match the speed of e-commerce itself.

7 RISK-BASED SURVEILLANCE AND ANALYTICS (PILLAR 3)

7.1 Why Risk-Based Surveillance is Non-Negotiable in E-Commerce

In the physical market, an inspector's day might be planned around a small number of site visits, selected through a combination of sector rotation, complaint follow-up, and professional judgement. Even without a sophisticated risk model, an inspector can scan shelves and physically pick out products for testing. However, e-commerce changes everything. A single major platform can:

- Host **tens of millions** of live product listings at any given moment.
- Add or update thousands of listings **per hour**.
- Allow sellers to operate under multiple accounts, with the ability to vanish and reappear under new names overnight.

In this environment, relying on random sampling or complaint-driven inspections is **like trying to drain the sea with a bucket** - high-risk products slip through unnoticed, while valuable enforcement time is wasted on low-risk, low-priority cases.

Risk-based surveillance is therefore not simply a best practice borrowed from abroad - it is **the only viable approach** for online market surveillance. It transforms enforcement from **reactionary firefighting** into **proactive prevention**, ensuring that limited resources are deployed where they will have the **greatest impact on consumer safety**.

7.2 From Concept to Practice: The National Risk Assessment Methodology (NRAM)

At the heart of Pillar 3 lies the creation of a **National Risk Assessment Methodology (NRAM)** tailored to Türkiye's e-commerce landscape. This methodology is not a generic "priority list" - it is a **living, data-driven system** that continuously evaluates products, sellers, and sales channels against a set of agreed, transparent risk factors.

The NRAM will:

- **Define "risk" in operational terms**: combining hazard potential, compliance history, seller behaviour, and market context.
- **Establish a standard scoring framework** so all market surveillance authorities (MSAs) apply the same logic, whether inspecting toys, electronics, cosmetics, or other regulated categories.
- **Automate scoring where possible** by embedding it in the Pillar 2 IT platform, so high-risk cases rise to the top of the enforcement queue instantly.

This common framework will end the current fragmentation where one MSA may prioritize a case that another ignores - **risk will be measurable, comparable, and transparent across agencies**.

7.3 Defining Risk in the E-Commerce Context

In e-MS, risk is multi-dimensional. It must account for:

1. Product-Specific Risk Factors

- **Inherent hazards**: choking, electrical shock, flammability, chemical toxicity.
- **Product category sensitivity**: toys, cosmetics, electrical goods, and childcare products are inherently higher risk.
- **History of non-compliance**: previous test failures, recalls, or bans in Türkiye or abroad.

2. Seller-Specific Risk Factors

- **Compliance track record**: repeat offenders rank higher in risk.
- **Country of establishment**: sellers outside Türkiye or the EU are harder to reach for enforcement.
- **Seller transparency**: absence of contact details, vague descriptions, or missing compliance documents are strong warning signals.

3. Market-Specific Risk Factors

- **Platform characteristics**: size, type (marketplace vs. retailer), cooperation history with MSAs.
- **Seasonality**: spikes in toy sales before holidays, cosmetics before festivals, electronics during sales events.
- **Product lifecycle speed**: fast-fashion items may disappear in weeks, making early detection crucial.

4. External Intelligence

- **Cross-border product safety alert networks**: alerts from the EU, OECD, or other trading partners.
- **Consumer complaints**: early warning indicators before hazards are formally identified.
- **Media reports**: viral stories can indicate products with high potential harm and reputational risk.

7.4 Turning Data into Priorities: How the Risk Model Works

Once operational, the NRAM will transform raw data into **enforcement priorities** through a clear sequence:

1. **Data Collection**

The Pillar 2 IT platform automatically ingests:

- Product listings from connected platforms.
- Seller registration data from ETBIS and ownership details from MERSİS.
- Compliance history from PGDBIS.
- Import data from TAREKS.
- Alerts from cross-border product safety networks.
- Consumer complaints from official channels.

2. **Risk Scoring**

Each product or seller is assigned a numerical score based on weighted factors.

Example: A battery-powered toy from a foreign seller, lacking safety documentation, with a similar model recalled in the EU, might score **90/100** - placing it in the "Immediate Action" category.

3. **Prioritization and Tasking**

   High-risk cases generate automated alerts for inspectors:
   - Immediate takedown requests to platforms.
   - Mystery shopping orders for laboratory testing.

4. **Dynamic Updating**

   Risk scores are **continuously recalculated** as new data come in.
   Example: If a seller removes all flagged listings and provides proof of compliance, their score decreases; if new complaints emerge, it rises.

7.5 The Role of Advanced Analytics and AI

The risk model will not be limited to fixed rules - it will also evolve with **predictive analytics and AI-driven detection**. Potential capabilities include:

- **Pattern detection in seller behaviour**: flagging accounts that close and reopen frequently to avoid penalties.
- **Trend analysis**: spotting sudden spikes in sales of products with known hazards elsewhere.
- **Text mining**: analyzing consumer reviews for safety-related keywords (e.g., "overheated," "broke after one use," "caused rash").

By combining these analytical tools with traditional enforcement knowledge, Türkiye's MSAs can **spot risks before they cause widespread harm**.

7.6 Institutionalizing Risk-Based Surveillance

For risk-based enforcement to become the norm, it must be **embedded into daily operations**, not left as an optional tool. This means:

- **Standard Operating Procedures (SOPs)** to guide every inspector in using the risk model.
- **Multi-agency coordination** so that all authorities - national and sectoral - use the same scoring and prioritization rules.
- **Feedback loops**: inspection outcomes feed back into the model, refining its predictive power over time.
- **Training and capacity building** (linked to Pillar 5) to ensure inspectors understand how to interpret and act on automated alerts.

Example: An inspector who receives a "high-risk" flag on a cosmetic cream will also see **why** it was flagged - e.g., "contains banned ingredient per EU alert; seller previously failed testing; imported from high-risk country." This approach builds trust in the system and reinforces consistent action.

7.7 Dependencies and Enablers

Pillar 3's success depends on:

- **Pillar 1 – Legal Harmonization**: giving authorities the power to collect, share, and process the data needed for risk scoring.
- **Pillar 2 – IT Tool Development**: supplying the technology to run the scoring algorithm and manage alerts.
- **Pillar 4 – Institutional Capacity Building**: ensuring coordinated use of the methodology across MSAs.
- **Pillar 5 – Human Resources and Training**: developing inspectors' data literacy and analytical skills.
- **Pillar 6 – Awareness Raising**: encouraging consumers to submit reports that feed into risk scores.

7.8 Risks and Mitigation

- **Risk**: Data gaps or low-quality inputs weaken scoring accuracy.
  Mitigation: Legal obligations for complete, structured platform data; automated data quality checks.
- **Risk**: Institutional reluctance to change from traditional inspection patterns.
  Mitigation: Pilot projects demonstrating faster detection and removal of unsafe products through risk targeting.
- **Risk**: Over-reliance on algorithms without human judgement.
  Mitigation: Maintain a hybrid model where human oversight validates high-impact enforcement actions.

7.9 Expected Impact

Once fully operational, Pillar 3 will:

- Enable Türkiye's MSAs to focus on **the most dangerous products first**, reducing consumer exposure to hazards.
- Significantly increase the speed of response to emerging risks, often **removing products before large-scale harm occurs**.
- Provide a **transparent, evidence-based prioritization process**, increasing public trust and accountability.
- Align Türkiye's market surveillance approach with **the EU's risk-based enforcement model**, fulfilling a critical accession requirement.

Ultimately, Pillar 3 turns the **flood of raw e-commerce data** into **targeted, timely enforcement actions** - ensuring that Türkiye can protect consumers effectively in a market that never sleeps.

8 INSTITUTIONAL CAPACITY BUILDING (PILLAR 4)

8.1 Why Institutional Capacity is the Decisive Factor in E-MS Reform

Institutional capacity is the **connective tissue** that turns laws, tools, and methods into real-world enforcement. Even if Türkiye adopts **EU-aligned legislation** (Pillar 1), develops an **advanced IT monitoring platform** (Pillar 2), and implements a **sophisticated risk assessment model** (Pillar 3), none of these reforms will achieve their full impact if:

- **Authorities lack clear mandates for e-MS activities**.
- **Coordination between market surveillance authorities (MSAs) remains slow or inconsistent**.
- **Staff do not have the skills and resources to act on intelligence in real time**.

The reason is straightforward: **e-commerce hazards do not respect sector boundaries or bureaucratic timelines**. A dangerous product might:

- Fall under multiple technical regulations (electrical safety + chemical safety + labelling).
- Be sold by multiple sellers across several platforms simultaneously.
- Require a response within hours, not weeks.

The **institutional challenge** is therefore to build a **national e-MS system** that acts as a **single operational network** — even though it is made up of multiple agencies with different sectoral responsibilities.

8.2 Current Institutional Set-Up and Why It Needs Reform

Under Türkiye's existing structure:

- **The Ministry of Trade (MoT)** provides horizontal coordination and policy direction for product safety.
- **PGDKK** (National Market Surveillance Coordination Board) oversees inter-agency coordination at a policy level.
- **Sectoral MSAs** handle specific product categories (e.g., Ministry of Health for cosmetics, Ministry of Industry and Technology for electrical products, Ministry of Agriculture and Forestry for materials in contact with food).
- **Customs authorities** (via TAREKS) control imports.
- **Consumer protection bodies** handle complaints and redress.

This arrangement has served Türkiye well in the **physical market surveillance** environment. However, it is **not fully adapted to e-commerce**, for three main reasons:

1. **Fragmented Operational Control**
   Each authority monitors "its" product category separately. In e-commerce, one online shop may sell dozens of product types - meaning unsafe products can slip through gaps if agencies don't share intelligence quickly.
2. **Reactive, Not Proactive**
   Current workflows often respond to complaints or periodic monitoring. E-commerce requires **continuous, proactive scanning**.

3. **No Unified Engagement with Platforms**
   Platforms face requests from multiple authorities, sometimes with conflicting timelines and formats. This reduces compliance efficiency and slows down takedowns.

The **Needs Analysis** confirmed that these institutional features create:

- Delays in cross-agency coordination.
- Duplication of work.
- For some gray areas no surveillance is performed.
- Inconsistent enforcement actions for similar risks.
- Missed opportunities for joint investigations.

8.3 Why Institutional Capacity Building Is Critical

If these gaps remain, Türkiye risks:

- Having legal powers that cannot be enforced at the speed of online trade.
- Underusing the IT and risk-scoring tools developed under Pillars 2 and 3.
- Allowing unsafe products to remain online longer than necessary.
- Failing to demonstrate to the EU that it has an **operationally mature, coordinated market surveillance system** for the digital environment.

Institutional capacity building is therefore not just about "more training" - it is about **reshaping operational governance** so that e-MS becomes:

- **Centralized in coordination**, but still **sectoral specialized** in enforcement.
- **Real-time in communication**, rather than paper-based or periodic.
- **Uniform in approach**, regardless of which MSA takes the lead.

8.4 Strategic Objectives of Pillar 4

Pillar 4 aims to:

1. **Create a single operational coordination point** for e-commerce market surveillance. *Justification*: A central hub avoids duplication, speeds up communication, and gives platforms and foreign regulators a single contact point.
2. **Standardize procedures and data-sharing formats** across all MSAs.

   Justification: Without standardization, the risk-scoring system will produce inconsistent actions, undermining public trust and legal defensibility.
3. **Institutionalize real-time information exchange** between agencies.

   Justification: In e-commerce, delays of even a few days can result in thousands of sales of an unsafe product.
4. **Formalize cooperation with platforms** under agreed service levels.

   Justification: Voluntary cooperation is uneven; clear obligations and timelines increase compliance rates.
5. **Equip all agencies with equal digital capacity** to use e-MS tools.

Justification: If some authorities cannot use the IT platform or analyze risk data, system-wide performance will be limited by the weakest link.

8.5 Key Institutional Measures and Their Rationale

1. National E-Commerce Market Surveillance Coordination Unit

- **What**: A central operational unit within MoT or under PGDKK that oversees daily e-MS activities, manages the IT platform, validates high-risk alerts, and assigns cases to the relevant MSA.
- **Why**: Centralized operational oversight ensures that high-priority cases are acted upon quickly, prevents overlap between agencies, and creates a single point of contact for platforms and EU partners.
- **Impact**: Streamlined case handling, faster takedowns, improved international cooperation.

2. Inter-Agency E-Commerce Task Force

- **What**: A standing body of appointed officers from each MSA who are trained in the e-MS SOPs and meet virtually on a weekly basis (or daily during crises) to review and act on high-risk cases.
- **Why**: Complex e-commerce cases often span multiple regulations; a permanent joint body ensures decisions are coordinated and immediate.
- **Impact**: Cross-sector enforcement becomes the norm, reducing delays for multi-hazard products.

3. National SOPs for E-Commerce MS

- **What**: Standard procedures covering monitoring, digital evidence preservation, inter-agency case transfer, platform notifications, and escalation pathways.
- **Why**: Without uniform procedures, identical cases can be handled differently by different MSAs — leading to legal challenges and reduced deterrence.
- **Impact**: Consistency, legal defensibility, and predictable outcomes for businesses and e-platforms.

4. Digital Capacity Upgrade for All MSAs

- **What**: Ensure all authorities have the hardware, secure access, and trained staff to use the Pillar 2 IT platform and risk tools effectively.
- **Why**: A central system is only as strong as its weakest participant. Without general access and skills, information bottlenecks will persist.
- **Impact**: All agencies operate at the same digital level, enabling a truly national system.

5. Platform Cooperation Frameworks

- **What**: Legally supported MoUs with all major marketplaces, defining timelines for takedown responses, data provision, and urgent risk handling.
- **Why**: Formal agreements ensure platforms meet obligations uniformly, removing uncertainty and uneven treatment.
- **Impact**: Faster, standardized platform compliance; reduced negotiation time per case.

6. Rapid Response Protocols

- **What**: Emergency measures that allow inspectors to order immediate removal of unsafe listings based on high-risk alerts, pending investigation.
- **Why**: In urgent cases (e.g., unsafe children's products), even 48 hours of delay can lead to widespread consumer exposure.
- **Impact**: Drastic reduction in consumer harm; increased deterrence for non-compliant sellers.

8.6 Strengthening PGDKK's Strategic Role

PGDKK (Lead by MoT) will:

- **Oversee consistent implementation** of the NRAM across all MSAs.
- **Monitor enforcement performance** using KPIs generated by the IT platform.
- **Represent Türkiye** in international product safety networks and ensure data flows in both directions.
- **Report publicly** on e-MS effectiveness, strengthening accountability and public confidence.

Note: In the EU, national coordination bodies like PGDKK are essential for ensuring sectoral regulators work to a unified strategy in cross-border and digital markets.

8.7 Risks if Pillar 4 is Not Implemented

- **Operational fragmentation** will persist, with agencies working separately.
- **Duplication of work** will waste resources and frustrate platforms.
- **High-risk products** may remain online longer than necessary due to slow information flows.
- Türkiye will **struggle to meet EU alignment targets** for coordinated market surveillance in the digital environment.

8.8 Expected Transformation

With Pillar 4 fully implemented:

- Türkiye will have a **coherent, nationally coordinated e-MS system** capable of rapid, cross-sector enforcement.
- Platforms will deal with **a single, structured engagement process**, improving compliance speed.
- The IT platform and risk methodology from Pillars 2 and 3 will be **fully utilized across all agencies**, not just by early adopters.
- Türkiye's institutional model will meet - and potentially exceed - EU benchmarks for coordinated market surveillance in e-commerce.

9 HUMAN RESOURCES AND TRAINING (PILLAR 5)

No matter how sophisticated the law (Pillar 1), how advanced the IT systems (Pillar 2), or how clever the risk assessment methodology (Pillar 3), a market surveillance system is only as strong as the people running it. In e-commerce market surveillance (e-MS), human capacity is not just an important factor - it is the decisive one.

E-commerce has fundamentally changed the nature of market surveillance work. In the physical marketplace, inspectors can rely on their eyes, hands, and laboratory testing to identify unsafe products. The e-commerce environment adds entirely new dimensions: inspectors must now track thousands of listings across dozens of e-platforms, interpret risk scores generated by algorithms, detect patterns of non-compliance hidden in data, and act with urgency before dangerous products reach consumers. This requires **a new generation of skills, mindset, and operational readiness**.

9.1 Why People Are the Real "Operating System" of E-MS

Technology can scan e-platforms for millions of products in seconds, but it cannot decide - with legal and practical precision - whether a product violates regulations, which authority has jurisdiction, or how to ensure swift removal. That decision-making requires:

- **Technical judgement** to interpret test results and risk signals.
- **Procedural expertise** to follow legally defensible enforcement steps.
- **Negotiation skills** to secure cooperation from e-platforms.
- **Cross-sector awareness** to act when a product breaches multiple regulations at once.

The Needs Analysis showed that Türkiye's inspectors are **highly competent within their sectoral domains** - but e-MS is not yet a routine part of their work, and training is uneven across authorities. Many MSAs have experimented with online monitoring, but without a standardized national approach, results vary: one inspector may take down a listing within hours, while another might require weeks to process the same type of case. These inconsistencies undermine both deterrence and public trust.

9.2 The Expanded Skillset for the Digital Marketplace

In the e-MS era, inspectors must combine the **technical rigour of traditional market surveillance** with the **agility of a cyber investigator**. The job description now includes:

- Understanding **how e-commerce platforms function** - their search algorithms, listing processes, and seller registration systems.
- Detecting **evasion tactics** such as duplicate accounts, altered product photos, or misleading labelling to bypass detection.
- Navigating **data-rich environments**, interpreting automated alerts, and filtering noise from genuine threats.
- Mastering **digital evidence preservation** - knowing how to capture and store online content so it is admissible in court.
- Communicating effectively with platforms, foreign regulators, and sometimes directly with consumers in urgent risk scenarios.

These are not “bonus” skills - they are mission-critical. Without them, even the best IT tools will not deliver results.

9.3 From Ad-Hoc Training to a National E-MS Learning System

Pillar 5 moves Türkiye from **sporadic, agency-specific training** to a **coordinated, national learning system** for e-MS. This training system will be **integrated, sector-aware, and continuous**, ensuring that every inspector, in every MSA, works from the same skill base.
The national training programme will be built around three tiers:

1. **Core E-MS Competencies** - For all inspectors

   This will cover:
   - Fundamentals of online market surveillance.
   - Use of the national IT platform and risk-scoring tools.
   - Application of the national e-MS SOPs (developed under Pillar 4).
   - Digital evidence handling and data protection compliance.
2. **Sector-Specific Specialization** - Tailored modules for different MSAs

   Examples:
   - Detecting prohibited substances in cosmetics sold online.
   - Identifying nonconforming electrical products from listing images and descriptions.
   - Spotting misleading safety claims in food contact materials.
   - Handling products with multiple hazards that require joint MSA action.
3. **Advanced Specialist Skills** - For designated e-MS experts

   This track will develop high-level capabilities in:
   - Platform crawler configuration.
   - Big data analysis for identifying patterns of repeated non-compliance.
   - Cross-border cooperation using international product safety alert networks.
   - Crisis management for urgent, high-risk cases.

Training will be **hands-on, scenario-based, and practice-heavy** - inspectors will not just hear about online inspections, they will perform them in controlled simulation environments. Exercises will include identifying high-risk products, drafting takedown requests, and managing cross-agency coordination in real time.

Annex IV – Training and Awareness Raising Activities – presents an initial proposal for capacity-building measures for e-MS personnel, to be expanded over time with additional topics as new needs emerge. It is intended to serve as a living tool, supporting the continuous development of e-MS personnel and fostering competence among all stakeholders involved.

9.4 Institutionalizing Knowledge and Avoiding “Training Decay”

Training without follow-up often results in “skill fade” - the slow loss of capability when knowledge is not used regularly. Pillar 5 addresses this by:

- Creating a **permanent e-MS knowledge base**, an online portal where SOPs, case studies, platform guides, and legal updates are stored and accessible to all MSAs.
- Establishing **peer-to-peer learning networks**, where inspectors can share lessons from difficult cases and propose improvements to national practice.
- Introducing **annual refresher training** to update skills and incorporate new laws, platform policies, or technology upgrades.

This approach ensures that knowledge is **retained, shared, and continuously renewed** - building resilience in the human side of the e-MS system.

9.5 Resourcing and Deploying Human Capital

Even with the right skills, **human resource allocation matters**. The Needs Analysis found that in many MSAs:

- e-MS duties are assigned "on top of" other inspection work, without dedicated time.
- Staff with IT or analytical expertise are spread thin, sometimes serving multiple units.
- Physical market inspections still dominate workload planning.

To address this, Pillar 5 proposes:

- Designating **dedicated e-MS inspectors** in every MSA, with explicit time blocks for online monitoring.
- Creating an **inter-agency pool of e-MS specialists** trained in advanced digital investigation, available to support complex or multi-hazard cases.
- Reviewing staff allocation annually to ensure that the balance between physical and online inspections reflects the growth of e-commerce.

This does not necessarily mean hiring large numbers of new staff; rather, it is about **strategic deployment of existing resources** so that e-MS is treated as a core duty, not a side task.

9.6 The Strategic Payoff

By building a national e-MS workforce that is **digitally skilled, operationally confident, and strategically deployed**, Türkiye will:

- React to online threats **in hours, not weeks**.
- Apply **consistent enforcement** across all sectors, improving fairness and deterrence.
- Maximize the value of the IT platform and risk model by ensuring inspectors know how to interpret and act on their outputs.
- Strengthen cooperation with platforms by speaking a "common technical language".
- Indicate to the EU that Türkiye's market surveillance system is not only legally aligned but **operationally capable** in the fast-moving digital environment.

In short, Pillar 5 is about **arming the people on the front lines** with the skills, tools, and confidence to protect consumers in the online marketplace. Without it, the other pillars risk becoming underused assets; with it, Türkiye gains a **high-performance human engine** driving its entire e-commerce market surveillance system.

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10 AWARENESS RAISING & STAKEHOLDER COOPERATION (PILLAR 6)

An e-commerce market surveillance (e-MS) system is not a self-contained machine. Even when it is supported by the strongest legal framework (Pillar 1), a sophisticated risk-based methodology (Pillar 3), the most advanced technology (Pillar 2), well-coordinated institutions (Pillar 4), and a skilled inspectorate (Pillar 5), it cannot succeed in isolation.

E-MS is an ecosystem. Its effectiveness depends on how well all its participants - public authorities, e-commerce platforms, sellers, industry associations, NGOs, and consumers - understand their roles, act on their responsibilities, and cooperate in good faith. Pillar 6 exists to build that ecosystem of shared responsibility, creating a network of informed, engaged partners who reinforce the work of the regulators and amplify its impact.

10.1 The Role of Awareness and Cooperation in the E-MS Chain

In e-commerce, the life cycle of an unsafe product is compressed into hours or days. A toy with a choking hazard or an electrical device with poor insulation can appear online in the morning, be purchased by hundreds of consumers by lunchtime, and be relisted under a different seller name by evening. This speed means that market surveillance authorities cannot be the only actors tasked with prevention and removal. Three things must happen simultaneously:

1. **Sellers must know the rules before they list a product.** If they understand safety requirements and the consequences of non-compliance, they are more likely to prevent hazards proactively.
2. **Platforms must be ready to act as operational partners**, not just passive intermediaries, taking swift action to remove unsafe listings and prevent reappearance.
3. **Consumers must be aware of the risks and empowered to report problems**, serving as extra eyes and ears for the system.

Without these three elements, authorities will always be playing “hide-and-seek”.

10.2 Creating a Culture of Compliance Among Sellers

Sellers are the **first and most direct source** of market entries. A culture of compliance - where safety is seen as part of doing business rather than an optional burden - is the foundation of a preventive strategy.

Pillar 6 proposes a **multi-layered awareness programme** that addresses different seller profiles:

- **Large sellers and brand owners** already have compliance systems but can be encouraged to go further by setting voluntary safety benchmarks that exceed the minimum legal requirements, acting as role models for their sector.
- **Small and medium-sized enterprises (SMEs)** often lack in-house compliance capacity. For them, simple, visual, and sector-specific guidance is essential. This might take the form of illustrated checklists, quick reference cards, and “Top 10” safety rules for common product types.

- **Micro and informal sellers**, including those selling via social media or small online stores, need targeted messaging through the channels they actually use. Short videos, infographics, and in-platform notifications can be more effective than long formal guidelines.
- **Cross-border sellers** require clear multilingual information explaining that Turkish product safety laws apply to any goods sold into the Turkish market, regardless of where the seller is based.

To make this practical and scalable:

- The Ministry of Trade, in cooperation with sectoral MSAs and within the role given to PGDKK, should produce **plain-language compliance guides** adapted to each product category.
- **Online compliance toolkits** should be developed and hosted on a dedicated government portal, featuring self-assessment tools, FAQs, and links to relevant legislation.
- **Webinars, virtual workshops, and onboarding sessions** should be planned and offered regularly, with recordings available for later viewing.
- **Platform onboarding packages** should be developed jointly with marketplaces so that every new seller receives compliance information before they can list products.

The rationale is clear: preventing non-compliant and/or unsafe products from being listed in the first place is ensuring the highest possible safety level, since it reduces enforcement workload, protects consumers earlier, and improves trust between sellers and authorities.

10.3 Turning Platforms into Proactive Partners

E-commerce platforms are the operational hubs of the digital marketplace. In practice, they have more immediate control over product listings than regulators, since they can remove, block, or flag items instantly. However, the Needs Analysis revealed inconsistent cooperation: some platforms are highly responsive, while others lack dedicated contact channels, making enforcement slower and more cumbersome.

To address this, Pillar 6 calls for **formalizing cooperation** through:

- **Legally supported Memoranda of Understanding (MoUs)** with all major platforms, setting out:
    - Standard timelines for takedown action (e.g., removal within 24 hours for high-risk cases).
    - Agreed formats for sharing seller and product data.
    - Procedures for urgent escalations.
- **Platform liaison officers** – individuals appointed within each marketplace responsible for day-to-day contact with the national e-MS coordination unit.
- **Joint drills and simulations** – exercises where inspectors and platform staff rehearse real-life scenarios, such as mass recalls or removal of a dangerous product category.

This is not just about goodwill – it is about creating predictable, efficient workflows that prevent delays and duplication. The faster a platform responds, the shorter the exposure window for consumers.

10.4 Empowering Consumers as Safety Actors

Consumers are often the first to encounter an unsafe product - and sometimes the first to suffer harm from it. Yet, in many cases, they do not know how or where to report their concerns, or they doubt whether reporting will lead to action.

Pillar 6 aims to make **consumer reporting a normal, easy, and valued part of the e-MS system**. This will include:

- A **central online reporting portal** linked to the national IT system, accessible via desktop and mobile.
- **Simple reporting forms** with guidance in plain language, supported by photo upload options for product images and purchase details.
- **Awareness campaigns** across social media, consumer organization networks, and public media to explain how to recognize non-compliant and/or unsafe products and how to report them.
- **Feedback loops** so that consumers receive confirmation when their report leads to action - building trust and reinforcing participation.

The justification is direct: consumers are the most numerous monitoring resource available, and with proper channels, they can become a vital complement to official surveillance.

10.5 Leveraging Industry Bodies and Civil Society

Industry associations, chambers of commerce, consumer organizations, and NGOs are powerful amplifiers for awareness efforts. They have established communication networks, credibility within their communities, and the ability to reach specific target groups more effectively than government campaigns alone.

Pillar 6 will:

- Establish **regular stakeholder fora** where these groups can share concerns, propose improvements, and receive updates on e-MS reforms.
- Engage them as **co-hosts of sector-specific workshops**, increasing reach and uptake.
- Involve them in **co-designing awareness materials** so that messaging reflects sector realities and addresses practical challenges.

By using these multipliers, awareness campaigns will have broader reach, greater relevance, and stronger uptake.

10.6 Embedding Cooperation into the System

Singular campaigns or sporadic meetings are insufficient. Cooperation must be embedded into the **routine operating culture** of the e-MS system. This may be achieved by:

- Incorporating stakeholder engagement into the **permanent work programme** of the national e-MS coordination unit.
- Holding **quarterly review meetings** with platforms to assess cooperation performance, address bottlenecks, and share best practices.

- Publishing **annual cooperation and engagement reports** with performance indicators, case studies, and improvement plans.

The principle here is continuity - awareness raising and cooperation are not self-standing events, they are ongoing processes.

10.7 The Systemic Benefits of Pillar 6

When fully implemented, Pillar 6 will:

- Ensure sellers have **no excuse for ignorance** of safety rules.
- Turn platforms into **consistent, predictable partners** in enforcement.
- Empower consumers to serve as **early warning sensors** for unsafe products.
- Build trust through transparency, feedback, and shared responsibility.
- Shift the entire e-commerce environment towards **compliance by default**, reducing the need for corrective action and allowing regulators to focus resources on the highest-risk threats.

In effect, Pillar 6 transforms e-MS from a **government-only enforcement model** into an **all-stakeholder safety ecosystem**, where prevention, detection, and action are shared across the entire marketplace.

11 ACTION PLAN

11.1 Purpose and Role of the Action Plan

The **Action Plan** transforms the Strategy and Action Plan Report (SAPR) from a visionary document into a **practical roadmap** for establishing a modern, EU-aligned e-commerce market surveillance (e-MS) system in Türkiye. Its role is to:

- Provide a **shared roadmap** for all actors - Ministry of Trade, Market Surveillance Authorities (MSAs), customs, online platforms, and consumer organizations - to follow the same sequence of reforms.
- Serve as a **coordination tool** so legal, technical, and operational measures progress in harmony.
- Function as a **monitoring instrument**, making progress measurable and enabling course corrections in real time.

11.2 Strategic Integration with SAPR Pillars

Every action in the plan is anchored to one of the SAPR's six strategic pillars, ensuring a **holistic reform**:

1. **Legal Harmonization**
    - *Example of measures*: Draft amendments to empower authorities to conduct online inspections; legally mandate platform cooperation; align e-MS provisions with GPSR and DSA.
    - **Why it matters**: No IT tool, risk model, or inspection campaign will be sustainable without clear legal authority and enforceable obligations.
2. **IT Tool Development & Integration**
    - *Example of measures*: Design the national e-MS platform; integrate it with ETBIS, MERSIS, PGDBIS, and TAREKS; establish secure data exchange protocols with online platforms.
    - **Why it matters**: The sheer scale of e-commerce requires automated product monitoring, data-driven risk scoring, and centralized case management.
3. **Risk-Based Surveillance & Analytics**
    - *Example of measures*: Develop a national risk assessment methodology; introduce AI-based detection of unsafe products; use cross-border product safety alert networks and consumer complaints to target inspections.
    - **Why it matters**: Resources must focus on products with the highest likelihood of being unsafe or non-compliant, not random checks.
4. **Institutional Capacity Building**
    - *Example of measures*: Define roles between sectoral MSAs; create joint inspection teams; develop standard operating procedures (SOPs) for e-MS enforcement.
    - **Why it matters**: Strong institutional arrangements prevent overlaps, close enforcement gaps, and enable rapid multi-agency action.

5. **Human Resources & Training**
    - *Example of measures*: Create new job profiles for data analysts, e-MS inspectors, and IT administrators; deliver specialized training in risk analytics and online investigation methods; apply "train-the-trainer" models to build internal capacity.
    - **Why it matters**: Skilled people are as critical as good laws and tools — without them, systems remain under-used.
6. **Awareness Raising & Stakeholder Cooperation**
    - *Example of measures*: Launch awareness campaigns for online sellers; establish formal cooperation agreements with platforms; create easy-to-use consumer reporting channels for unsafe products.
    - **Why it matters**: Compliance is higher when economic operators and consumers understand the rules, the risks, and the ways to take action.

11.3 Sequencing and Dependencies

The measures are sequenced to ensure that **enabling actions** precede **dependent actions**:

- Legal mandates come before IT development and data sharing.
- Institutional frameworks and SOPs are finalized before joint inspections begin.
- Training is delivered when the systems and methodologies to be used are ready.
- Awareness campaigns are timed with the introduction of new legal or procedural requirements.

11.4 Phased Implementation

The plan is implemented in **three overlapping phases**:

- **Phase 1 – Short Term (Months 1–12)**
  Laying the groundwork through legal reforms, initial IT platform design, institutional role clarification, and creation of the risk methodology.
- **Phase 2 – Medium Term (Months 13–36)**
  Rolling out the e-MS platform, launching risk-based inspections, piloting AI-assisted monitoring, and beginning formalized cooperation with platforms.
- **Phase 3 – Long Term (Months 36+)**
  Integrating e-MS operations into daily work, refining the risk model based on results, expanding awareness efforts, and ensuring sustainability post-project.

11.5 Responsibility Allocation

Each measure in the plan specifies a **Lead Institution** and **Supporting Institutions** (providing expertise, data, or operational capacity). For example:

- Drafting platform cooperation clauses → **Lead: MoT**, Support: MSAs, industry associations.
- Developing AI detection modules → **Lead: MoT IT Department**. Proposal: MSAs, consumer organizations, industry associations and DG for Customs
- Joint awareness campaign targeting SMEs → **Lead: MoT**, Support: MSAs, e-platforms, consumer groups.

Annex II – the Measures Matrix – highlights the links between the proposed actions, the SAPR pillars, their institutional ownership, and the sequencing required for effective implementation, while Annex III illustrates how the strategy, actions, and project activities are interconnected and mutually reinforcing.

11.6 Monitoring and Adjustment

The Action Plan will be actively managed as a **living document**:

- **Bi-annual progress reviews** will track the status of each measure, flag delays, and identify capacity bottlenecks.
- **Annual performance reports** will assess whether the reforms are delivering concrete improvements - such as increased detection of unsafe products and faster removal from online marketplaces.
- **Adaptive updates** will allow re-sequencing or adding new measures in response to EU legal changes, market dynamics, or emerging product risks.

11.7 Expected Outcomes

Once implemented, the Action Plan will enable Türkiye to:

- Operate a fully functional **EU-aligned e-MS framework** with strong legal underpinnings.
- Detect and remove non-compliant and/or unsafe products from online markets **rapidly and systematically**.
- Allocate enforcement resources using a **data-driven, risk-based approach**.
- Achieve seamless **cross-agency coordination** across all MSAs.
- Engage sellers, platforms, and consumers as **active partners in market safety**.

12 RISK MANAGEMENT AND MITIGATIONS

12.1 Why Risk Management is Essential for SAPR

The transformation of Türkiye's e-commerce market surveillance (e-MS) system is ambitious and unprecedented in scope. It spans legislation, institutional arrangements, technology deployment, human capacity building, and stakeholder engagement - all in a highly dynamic market where the products, sellers, and even the selling e-platforms can change overnight.

In such a volatile and multi-stakeholder environment, the question is not whether risks will arise but how well we will anticipate, monitor, and respond to them. Without proactive risk management, legislative reforms could stall for months or years, delaying every dependent measure; expensive IT tools could be developed but remain underused due to lack of staff skills or institutional commitment; and coordination gaps could allow unsafe products to slip through, damaging consumer trust and undermining Türkiye's EU alignment progress. For these reasons, risk management is built into the SAPR from the start, not added as an afterthought.

12.2 Types of Risks and Their Relevance to e-MS Reform

Legal and Regulatory Risks

Why this matters: Without legal provisions granting clear authority for online inspections, platform data requests, and cross-border enforcement cooperation, other reforms will have no enforceable foundation.
Potential consequence: Platforms may refuse cooperation, data may be inaccessible, and unsafe products may remain online indefinitely.
Mitigation: Early preparation of draft amendments, alignment with EU GPSR and DSA, and securing cross-ministerial support before submission to Parliament.

Institutional Coordination Risks

Why this matters: e-MS involves multiple authorities with overlapping mandates. Without clear role division, enforcement may be inconsistent or duplicated.
Potential consequence: Conflicting decisions, wasted resources, and diminished credibility with platforms and sellers.
Mitigation: MoUs defining responsibilities, regular inter-agency coordination meetings, and joint inspection planning using shared SOPs.

Technical and IT Risks

Why this matters: The e-MS platform must interface with several already existing systems. Integration challenges are common.
Potential consequence: System may be delayed, operate with partial functionality, or require costly reengineering.
Mitigation: Early feasibility studies, sandbox test environments, and phased roll-outs so problems can be addressed without halting the whole system.

Human Resources Risks

Why this matters: Online market surveillance demands new skill sets - especially in data analytics and digital investigation.
Potential consequence: Even with a functional IT platform, unsafe products may not be identified quickly or accurately if staff cannot interpret the data.
Mitigation: Recruit or reassign skilled staff early, deliver targeted training linked to actual tools, and build internal training capacity.

Stakeholder Engagement Risks

Why this matters: Platforms, sellers, and consumer groups are active participants in product safety. Without cooperation, enforcement will be reactive and incomplete.
Potential consequence: Platforms may delay or limit data sharing, sellers may ignore obligations, and consumers may fail to report unsafe products.
Mitigation: Simplify reporting requirements, demonstrate reputational benefits of compliance, and launch targeted information campaigns.

External Environment Risks

Why this matters: E-commerce is shaped by EU/global rules, new technologies, and evolving business models. Sudden changes can disrupt plans.
Potential consequence: Tools and processes may need rapid revision mid-implementation, risking delays and budget overruns.
Mitigation: Continuous monitoring of EU developments, flexible system design, and governance structures enabling rapid adjustments.

12.3 The SAPR Risk Matrix

The Risk Matrix, presented in Annex I, summarizes the key risks identified, their assessed probability and impact, the mitigation measures agreed, and the institution responsible for managing each risk.

12.4 How Risk Management Links to the Action Plan

The 53 measures in the SAPR Action Plan are all interconnected. If a foundational measure is delayed, its dependent measures will also be delayed. By mapping dependencies between measures, the risk management process identifies 'pressure points' - measures whose failure would have the widest ripple effect - and ensures mitigation efforts focus there first. For example: Delay in legal amendments for platform cooperation affects IT data integration, SOP development, and awareness campaigns for sellers. Delay in risk methodology finalization postpones related training, analytics tool deployment, and targeted inspections.

12.5 Guiding Principles for Risk Mitigation

1. Prevention is better than correction - invest effort upfront to anticipate risks.
2. Parallel tracks - develop enabling actions in multiple areas so delays in one do not halt progress elsewhere.

3. Built-in flexibility - design tools, laws, and procedures to accommodate future changes without full redesign.
4. Transparency - share risk information openly with all stakeholders to foster trust and joint problem-solving.
5. Evidence-led adaptation - base mitigation decisions on real data from monitoring and evaluation.

12.6 The Benefits of Effective Risk Management

Consistent application of these principles will keep the SAPR on schedule despite inevitable disruptions, protect the return on investment in IT systems and training, maintain stakeholder trust, and ensure Türkiye remains agile in responding to EU rule changes, emerging technologies, and shifting market patterns.

Ultimately, effective risk management is what turns the Action Plan from a static document into a resilient, adaptive strategy - one that can handle the uncertainties of the e-commerce landscape while delivering its promised results for consumer safety and EU alignment.

13 CONCLUSIONS

The Strategy and Action Plan Report (SAPR) proposes a comprehensive framework for enhancing Türkiye's e-commerce market surveillance (e-MS) system in line with EU product safety requirements. Based on the Needs Analysis, stakeholder consultations, and legal gap assessment, the SAPR identifies six strategic pillars:

1. Legal Harmonization
2. IT Tool Development & Integration
3. Risk-Based Surveillance & Analytics
4. Institutional Capacity Building
5. Human Resources & Training
6. Awareness Raising & Stakeholder Cooperation

These pillars are translated into 53 concrete measures within the Action Plan, organized into three phases (short term, medium term and long term) to ensure logical sequencing and dependency management. The accompanying Risk Management framework identifies legal, institutional, technical, human resource, stakeholder, and external environment risks, with mitigation measures and responsible institutions defined for each.

If implemented as designed, the SAPR promises to:

- Strengthen the legal basis for e-MS operations.
- Enable technology-supported detection and removal of non-conforming and/or unsafe products from online marketplaces.
- Improve institutional coordination and resource allocation.
- Increase awareness and compliance among online sellers and platforms.
- Enhance consumer protection and accelerate Türkiye's alignment with EU product safety regulations.

The SAPR is therefore both a strategic vision and a practical implementation tool, ensuring that reforms are sustainable and adaptable to evolving e-commerce challenges.

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ANNEXES

ANNEX I: RISKS MATRIX

ANNEX II: MEASURES MATRIX

ANNEX III: STRATEGY, ACTIONS AND PROJECT ACTIVITIES

ANNEX IV: TRAINING AND AWARENESS RAISING ACTIVITIES

ANNEX V: TAXONOMY TABLE

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Annex I Risks Matrix

Risk Category	Description	Probability	Impact	Mitigation	Risk Owner
Legal and Regulatory	Delays in adopting legal amendments for e-MS authority and platform cooperation	High	High	Early drafting, stakeholder consultations, political ownership/inclusion before submission to Parliament	MoT DGPSI and Legal Department
Institutional Coordination	Overlap/conflict between MSAs on enforcement roles	Medium	High	Binding MoUs, joint planning meetings, integrated case management protocols	MoT DGPSI (PGDKK Secretariat)
Technical and IT	Integration issues between e-MS platform and existing systems (ETBIS, MERSIS, PGDBIS, TAREKS)	Medium	High	Feasibility studies, sandbox testing, phased roll-outs with fallback options	MoT DGPSI and IT Department
Human Resources	Insufficient data analytics skills for risk-based surveillance	High	Medium	Early recruitment of specialists, aligned training, train-the-trainer programmes	MoT HR Department and MSAs HR Departments
Stakeholder Engagement	Low cooperation from e-platforms or sellers due to perceived burden	Medium	Medium	Clear legal obligations, dialogue with e-platforms, simplified reporting formats	MoT DGPSI (PGDKK)
External Environment	Sudden changes in EU legislation or global e-commerce practices	Low	High	Continuous monitoring, flexible governance, readiness to amend measures	MoT DGPSI and EU Affairs Department

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Annex II Measures Matrix

	Measure	Institutions	Priority
Pillar 1: Legal Harmonization			
1	In order to achieve full legal alignment in the context of product safety and MS in e-commerce **existing gaps need to be identified**.	Ministry of Trade & Market Surveillance Authorities (MSAs), with TAT support	Short Term
2	Primarily in terms of cooperation, **the operational principles of the e-MS and implementation guidelines** need to be developed.	Ministry of Trade (MSAs) with TAT support	Short Term
3	The "Regulation on Market Surveillance of Products Placed on the Market Through Means of Distance Communication" should be **updated** by considering the needs of e-MS **and effectively implemented**.	Ministry of Trade	Medium Term
4	The MSAs need to prepare **secondary legislations necessary for institutional cooperation**.	Ministry of Trade MSAs with TAT support	Medium Term
5	A regulatory **obligation should be introduced requiring e-commerce platforms to ensure traceability and provide access** to structured data.	Ministry of Trade	Medium Term
6	A regulatory obligation should be introduced to **mandate the inclusion of information targeting vulnerable groups in sales listings**.	Ministry of Trade MSAs	Medium Term
7	**Clear and explicit provisions regarding e-MS and mystery shopping methods** should be regulated at the level of primary legislation.	Ministry of Trade MSAs	Medium Term
8	The legislation should be clarified to **eliminate uncertainties regarding which acts are subject to which sanctions** in the frame of MS.	Ministry of Trade MSAs	Medium Term
9	It should be **made mandatory for e-platforms to include information** such as brand, model, license and registration number in their product listings.	Ministry of Trade MSAs	Medium Term
10	**Obligations should be differentiated based on the size of the e-platform** (large-small) and this distinction should be explicitly reflected in the legislation.	Ministry of Trade MSAs	Medium Term
11	Sellers should also be required to **designate a contact point in Türkiye**.	Ministry of Trade MSAs	Medium Term
12	A legal framework should be established to encourage platforms to **carry out internal control procedures**.	Ministry of Trade MSAs Ministry of Foreign Affairs-Directorate for EU Affairs	Medium Term

13	**Inspection principles** should be clearly and practicably defined in the legislation.	Ministry of Trade MSAs	Medium Term
14	**An information mechanism and corresponding legislation should be developed** to ensure that risky products and sellers are monitored by e-commerce platforms.	Ministry of Trade	Medium Term
15	In the context of e-market surveillance (e-MS), there is **a need for a clear legal basis** for practices such as sample procurement through 'mystery shopping', the use of pseudonyms or the declaration of alternative delivery addresses.	Ministry of Trade	Long-term
16	A legal basis should be established for the use of pseudonyms and delivery addresses **in a manner that ensures the protection of personal data during the mystery shopping process**.	Ministry of Trade MSAs	Long-term
17	Specific regulations should be introduced **to address grey areas concerning the allocation of responsibilities for multi-category products** such as toys-stationery items and materials intended to come into contact with food.	Ministry of Trade MSAs	Long-term
18	Legislative amendments should be made to remove **budget-related obstacles.**	Ministry of Trade MSAs In coordination with Ministry of Finance	Long-term
19	A regulatory framework should be established **to enable access to information from systems such as Safety-Gate, ICSMS.**	Ministry of Trade	Long-term
20	**Legal safeguards should be provided for mystery shopping activities** within the scope of audits conducted by the Court of Accounts	Ministry of Trade MSAs In coordination with the Court of Accounts	Long-term
Pillar 2: IT Tool Development and Integration			
21	There is **a need to develop e-MS software** compatible with the market surveillance practices implemented in Türkiye.	Ministry of Trade MSAs with TAT support	Short Term
22	It is important to **develop technical specifications and system requirements** that reflect user and organizational needs.	Ministry of Trade with TAT support	Short Term
23	**A technical and administrative assessment should be made on the feasibility of interactive operation with national databases** (ETBIS, MERSIS, PGDBIS, TAREKS, vb.).	Ministry of Trade with TAT support	Short Term
24	A **software design should be developed to ensure that product safety information appears semantically in the some easily**	Ministry of Trade E-Commerce Platforms MSAs	Short Term

	accessible locations across all e-commerce pages.	with TAT support	
25	**Minimum criteria** such as image resolution and label visibility **should be** established, and safety markings, warnings **and labels** must be made clearly readable in product images. Images should appear directly on the seller product advertisement pages.	Ministry of Trade E-Commerce Platforms MSAs with TAT support	Short Term
26	**The system should be capable of sending and receiving automated lightweight messages between the MSAs, and E-Commerce platforms.**	Ministry of Trade with TAT support	Short Term
27	There is **a need to develop e-MS software** compatible with the market surveillance practices implemented in Türkiye.	Ministry of Trade MSAs with TAT support	Short Term
28	Data entry into PGDBIS should be simplified and **integration with TAREKS and other market surveillance databases** should be ensured. (Data must be entered into PGDBIS manually for each inspection.)	Ministry of Trade	Medium Term
29	E-MS software should be designed **to operate in an integrated manner with the EBYS** (Electronic Document Management Systems) of public institutions.	Ministry of Trade MSAs	Medium Term
30	**Decision algorithms should be transformed** into AI-based structures operating with unsupervised machine learning. These algorithms should also simplify the product search in various context and catalogues.	Ministry of Trade	Medium Term
31	**Software modules should be developed to scan social media sales** and price comparison websites.	MSAs	Medium Term
32	**Safety markings should be visibly included** in product images and should be in a resolution that ensures they are **clearly readable**.	E-Commerce Platforms Ministry of Trade MSAs	Medium term Medium Term
Pillar 3: Risk – based Surveillance and Analytics			
33	There is **a need for a common and standardized risk assessment methodology** to be used by market surveillance authorities. Particularly for the risk classification, assessment of the conformity and decision for the inspection process.	Ministry of Trade MSAs with TAT support	Short Term
34	**Technical and institutional capacity needs to be enhanced** for the use of advanced technologies such as AI and machine learning	Ministry of Trade MSAs	Medium term

	in trend analysis, efficient chat, and risk assessment.		
35	The necessary **technical and legal arrangements should be** prepared to obtain data from e-commerce platforms for use in trend and seasonality analysis.	Ministry of Trade	Medium Term
Pillar 4: Institutional Capacity Building			
36	To enable **the use of mystery shopping activities as evidence within e-MS** processes, implementation principles and appropriate tools need to be defined.	Ministry of Trade MSAs	Medium Term
37	**Job descriptions for e-MS activities** should be established in regional offices of the MSAs and a sufficient number of personnel should be assigned to carry out these tasks.	Ministry of Trade MSAs	Medium term
38	Each MSA should **establish internal regulations and coordination protocols** related to e-MS activities.	Ministry of Trade MSAs	Medium term
39	The **establishment of structured protocols** (MoUs) regulating cooperation with e-commerce platforms should be encouraged.	Ministry of Trade MSAs E-Commerce Platforms	Medium term
40	**Budgetary and operational gaps must be addressed** to enable the implementation of mystery shopping in e-commerce.	Ministry of Trade MSAs	Long-term
41	To conduct mystery shopping effectively, **virtual consumer profiles should be created** for each market surveillance authority and integration with **virtual payment systems should be ensured**.	Ministry of Trade MSAs	Long-term
Pillar 5: Human Resources & Training			
42	**IT systems training support should be provided** for personnel who will use the e-MS software and the necessary technical infrastructure for its use should be established.	Ministry of Trade MSAs with TAT support	Short Term
43	Trainings should be organized on the **protection of personal data in digital purchases made using pseudonyms**.	Ministry of Trade MSAs Consumer Organizations E-Commerce Platforms Sectoral Associations with TAT support	Short Term
44	**Human resource planning** should include future needs for IT analysts, risk assessors and digital inspectors. There is a particular need for specialization in data science.	Ministry of Trade MSAs	Medium term
45	**Data analysts and risk modelling experts should be employed** to support advanced MS systems.	Ministry of Trade MSAs	Medium term

46	**Training programs should be differentiated** based on functional roles (IT, legal, field inspection).	Ministry of Trade MSAs E-Commerce Platforms Consumers' Organizations Sectoral Organizations	Medium term
47	**Train-the-trainer models or scalable structures** that can be expanded at the regional level should be developed.	Ministry of Trade MSAs E-Commerce Platforms Consumer Organizations Sectoral Organizations with TAT support	Medium term
48	Providing training on **the use of a collaboration portal** that will enable information and data sharing among MSAs.	Ministry of Trade MSAs	Medium term
Pillar 6: Awareness Raising and Stakeholder Cooperation			
49	Information campaigns targeting consumers should be designed in a manner that is **up-to-date and suitable for online channels**.	Ministry of Trade MSAs Consumer Organizations E-Commerce Platforms Sectoral Associations with TAT support	Short Term
50	E-commerce platforms should be informed about **alert mechanisms concerning high-risk sellers**.	Ministry of Trade MSAs with TAT support	Short term
51	Specialized training should be provided to e-commerce platforms on **legal obligations, risk indicators** and online communication through the system.	Ministry of Trade MSAs E-Commerce Platforms with TAT support	Short term
52	Awareness projects should be developed for **social media sellers** and online consumers and **targeted communication efforts should be carried** out.	Ministry of Trade MSAs with TAT support	Short term
53	Consumer awareness should be increased regarding t**he visibility of safety markings on online sales** listings.	Ministry of Trade MSAs E-Commerce Platforms Consumer Organizations with TAT support	Short term
54	The concept of a **'Voluntary Inspector'**—in which consumers contribute on a voluntary basis—should be developed.	Ministry of Trade MSAs E-Commerce Platforms Consumer Organizations	Medium

Annex III Strategy, actions and project activities

Action		Strategy				
		Legal Harmonization	Institutional Capacity Building	Human Resources development	Awareness Raising	Effective Cooperation Mechanism (ECM)
IT Tool Development & Integration	Risk-Based Surveillance & Analytics		x			
	Marketplaces integration		x			
	MSAs integration		x		x	x
Training/ Seminars	Consumers	x		x	x	
	Online sellers and e-marketplaces	x		x	x	
	Consumer organizations	x		x	x	
	MSAs	x	x	x		x
Short Movies					x	
Social media applications					x	
Publications					x	
Project Closing Conference and Panel			x		x	x

ANNEX IV Training and Awareness RaisinG Activities

TRAINING ACTIVITIES

No	Training Topic	Target Audience	Focus Area	Duration*	Sequencing	Training Format
1	Legal and Regulatory Framework	MSAs Lawyers with the Union of Turkish Bar Associations or Ankara Bar Association Consumer Organizations E-Commerce Platforms	- Understanding EU regulations (GPSR, DSA, Regulation 2019/1020), - Understanding the reflections to the Turkish legislation and remaining gaps.	1 day / regulation – 3 days in total		Informative (for current legislation)
2	Legal and Regulatory Framework	MSAs Lawyers with the Union of Turkish Bar Associations or Ankara Bar Association Consumer Organizations E-Commerce Platforms	- The revisions to be reflected on the e-MS Regulation of Türkiye. - New obligations for parties - New rules for application of a better coordinated and collaborative e-MS implementation.	2 days – could be repeated in different provinces or delivered online	After the preparation of an updated draft e-MS Regulation	Informative for Consumers and E-Platforms “Train the Trainers” for MSAs
3	Digital Tools and Risk-Based Inspection	MS Inspectors	- Understanding the application of digital risk models, - Analyzing data collected from platforms, - Understanding of data analysis by using the LLM systems. - Understanding Decision Support Systems, - Understanding trend prioritization methods.	1 day/Ankara	After the Pilot Implementation	Train the Trainers
4	Administration of Digital Tools and Risk-Based Inspection	IT Units of MSAs	- Understanding of the user account management and tracking the activity. - Understanding of e-MS process and methods of data crawling/scraping. - Data Analysis methods. Use of the LLM system for the efficient analysis on data scraped.	1 day /Ankara	After the Pilot Implementation	Direct application admin training

No	Training Topic	Target Audience	Focus Area	Duration*	Sequencing	Training Format
			- User access controls. - Portal training for the information share between the MSAs. - Data transfer controls and log analysis. - AI system training for the risk analysis models success. - Using web scraping, metadata and closed group monitoring to track unsafe products, - Handling evidence in digital environments. - EMS system administration for the Beneficiary DGIT. - Periodical evaluation of system efficiency and effectiveness resulting in corrections & corrective measures (including training)			
5	Platform Engagement and Cooperation Mechanisms	E-Commerce Platforms (Compliance Teams) MSAs	- Clarifying e-platform's responsibilities within the revised e-MS Regulation, - The possibility of developing data sharing mechanisms (MOUs, structured communication formats), - Fostering cooperation based on EU good practices, - Minimum datasets to be shared by platforms (seller info, sales trends, delistings), - Awareness raising activities towards sellers of the e-platforms systemically and effectively.	2 days – 1 day in Istanbul, 1 day in Ankara	After the preparation of an updated draft e-MS Regulation	Informative
6	Electronic commerce service provider (independent e-commerce companies) awareness	Electronic commerce service providers Chamber of Commerce Officials	- Product safety and recalls, - Training on product categories under specific regulations (medicines, food, toys, electrical products, etc), - Documentation and record keeping,	1 day/product category	Under the current legislation and also after the revised e-MS legislation	Informative & "Train the Trainers" programme

No	Training Topic	Target Audience	Focus Area	Duration*	Sequencing	Training Format
	raising for product safety[2]		- Handling complaints, returns and refunds, - Understanding product markings, labels and packaging responsibilities.			
7	AI-Powered Market Surveillance	MS Inspectors ICT Units Legal Officers	- Using AI-driven tools for product analysis and risk identification, - Assessing legal boundaries under GDPR and DSA.	2 days		Informative
8	Interoperability (Customs and MS)	MSAs Customs Officers Risk Analysts DGIT	- Integrating TAREKS and PGDBIS systems (communicating systems) - Addressing cross-border challenges (in line with EU priority areas reflected on the February "Toolbox" report),	2 days	After the Pilot Implementation	Official
9	Effects of Noncompliant and/or Unsafe Products in E-Commerce	MSAs E-Commerce Platforms	- Costs of noncompliant and/or unsafe goods, - Analyzing the reputational damages to businesses. - Implementing case-based, hands-on methods including mystery shopping, scenario exercises and joint simulations.	1 day		
10	Practical and Interactive Training Methods	All Stakeholders		1 day		

* The duration may be revised in line with the ToR requirements, or recommendations for changes may be submitted.

[2] This training should be conducted in the designated provinces in coordination with the Chambers of Commerce and the Provincial Trade Directorates. The presence of an 'e-commerce committee' should be taken into account when selecting the provinces

SEMİNARS AND WORKSHOPS

No	Seminar/WS Topic	Target Audience	Focus Area	Duration	Seminar/WS Format
1	Platform Engagement and Cooperation Mechanisms	E-Commerce Platforms (Compliance Teams) MSAs	- Awareness raising activities towards sellers of the e-platforms systemically and effectively.	1 day. We need to repeat it in different locations.	Informative
2	Institutional Capacity and Coordination	MSAs (High level awareness raising) Coordinating Authorities (DGPSI) Policy Makers (annual plans and programmes organizing institutions)	- Reviewing and clarifying institutional roles, - Discussing responsibility sharing for "gray areas" between MSAs, - Discussions on inter-agency coordination and joint inspections, - Exploring central coordination mechanisms, including establishing a single institution for MS, - Promoting cross-agency data exchange.	1 day	Informative
3	Enforcement Diplomacy with Third Countries	MSAs Foreign Trade Officials Coordination Units (DGPSI)	- Establishing bilateral cooperation tools, - Aligning with EU third-country dialogues, - Building Türkiye's international enforcement profile.	1 day	Informative
4	Consumer Awareness and Complaint Mechanisms[3]	Consumer Organizations Teachers	- Raising awareness on noncompliant and/or unsafe products, - Understanding the difference between product safety and product quality, - Understanding product markings, labels and packaging, - Safety checks after purchase (before use) and actions to be taken in case of non-compliance, - How and where to report non-complying products and disputes handling,	1 day	Informative

[3] Informative sessions for teachers and consumer organizations in cities representing seven geographic regions, primarily Ankara, Istanbul, Izmir, Bursa, Diyarbakır, Gaziantep, Erzurum, and Antalya, with the support of Provincial Directorates of Commerce, Provincial Directorates of National Education, and Chambers of Commerce.

			- Optimizing complaint systems (ALO Ministry Lines, CIMER, Arbitration mechanism), - Designing consumer-centric warnings (standing out, more understandable and effective messaging), - Enhancing public engagement strategies.		

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