HANA SOLUTION LLC

BUYER-SIDE WORKING REFERENCE

Turkey Food Supplier Due Diligence Checklist

A working reference for supplier evaluation, private label and export readiness — for the desk of a buyer, founder or procurement lead sourcing food & FMCG products from Turkey.

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This checklist does not replace legal advice, laboratory testing, certification, veterinary or sanitary approval, customs advice, or the responsibilities of the importer of record.

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Buyer-Side Only · No Trading · No Supplier Commissions

Why This Document Exists

Food supplier due diligence should establish two things before commercial commitment: who will actually manufacture the product, and whether that specific product can be produced, documented and imported into the intended destination market. Turkey-side export procedures and destination-country controls can change materially by product, ingredient, processing method and market — particularly for animal-origin products, organic foods and certain higher-risk plant products.

> **Working status legend used throughout:** ☐ PASS ☐ OPEN ☐ HOLD ☐ N/A — mark each item as it is confirmed.

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— Scope Boundary & Source Register

Project Control Record

Record the exact commercial requirement before evaluating documents — many checks below cannot be answered correctly without an exact product + manufacturer + destination combination.

Product / SKU	
Supplier legal name	
Actual manufacturer	
Manufacturing facility address	
Destination country	
Importer of record	
Intended sales channel	*Retail / Food service / Industrial*
Private label	*Yes / No*
Target quantity / MOQ	
Incoterm + named place	
Ambient / chilled / frozen	
Animal-origin content	*Yes / No*
Organic claim	*Yes / No*
Halal requirement	*Yes / No / To confirm*
Target shipment date	
Specification revision	

1 Supplier Identity & Legal Status

01 Verify the contracting company

CHECK Confirm the supplier's exact registered legal name, company type, registration identifiers and registered address.

WHY IT MATTERS The quotation, contract, invoice, certificates and bank beneficiary should relate to an identifiable legal counterparty. A commercial name or website name is not enough.

EVIDENCE MERSİS details; current Turkish Trade Registry information; tax details where relevant; authorized-signatory information; quotation and invoice issued under the same legal entity.

AUTHORITY Turkey’s Merkezi Sicil Kayıt Sistemi (MERSİS / Central Registry Record System) and Türkiye Ticaret Sicili Gazetesi / Turkish Trade Registry Gazette.

02 Establish whether the seller is the manufacturer

CHECK Determine whether the quoting company owns/operates the production site, contracts another manufacturer, or acts as an exporter/trader.

WHY IT MATTERS A trader is not automatically unsuitable. The risk arises when the buyer believes it is contracting directly with a manufacturer while production is taking place elsewhere.

EVIDENCE Factory legal name; physical production address; relevant food-business registration/approval; relationship between seller and manufacturer; written disclosure of subcontracting; site photographs or buyer-appointed site verification where justified.

AUTHORITY Practical supplier due diligence; facility identity should also correspond with the applicable Ministry registration or approval.

03 Verify the food establishment’s Turkish registration or approval

CHECK Confirm that the actual manufacturing establishment holds the Gıda İşletmesi Kayıt Belgesi or Gıda İşletmesi Onay Belgesi, as applicable to its activity.

WHY IT MATTERS Registration and approval are activity-dependent. A document belonging to a sales office or another facility does not establish the production site’s status.

EVIDENCE Current registration/approval document showing operator and establishment details; clarify which site manufactures the proposed product.

AUTHORITY T.C. Tarım ve Orman Bakanlığı / Ministry of Agriculture and Forestry — Kayıt / Onay procedures.

04 Match the facility across all supplier evidence

CHECK Compare the facility name/address on certificates, audit reports, test reports, export documentation and food-establishment records.

WHY IT MATTERS Certification for Factory A does not automatically cover production at Factory B.

EVIDENCE Certificate schedules/scopes; site address; manufacturing licence/registration; audit report cover page; laboratory report sample origin; export certificate drafts.

AUTHORITY Applicable certification scheme and competent authority, depending on the document.

05 Confirm disclosed subcontracting

CHECK	Ask whether processing, packing, sterilisation, freezing, storage or labelling will occur at another establishment.
WHY IT MATTERS	The subcontractor may introduce a different food-safety, certification, traceability or export-eligibility position.
EVIDENCE	Subcontractor name/address; activity performed; approval/certification documents; traceability process between locations.
AUTHORITY	Buyer control point; product/destination rules may impose additional establishment requirements.

06 Match the payment beneficiary to the transaction

CHECK	Confirm that requested bank details make commercial sense against the contracting party.
WHY IT MATTERS	An unexplained individual, unrelated company or third-country beneficiary creates counterparty and payment-control risk.
EVIDENCE	Pro-forma invoice; company bank details on controlled documentation; written explanation and contractual basis for any third-party payment arrangement.
AUTHORITY	Commercial due diligence rather than food regulation.

2 Product & Specification Verification

07 Lock a controlled product specification

CHECK	Establish a written master specification before comparing suppliers.
WHY IT MATTERS	A price comparison is unreliable when suppliers are pricing different grades, formulations, tolerances or pack configurations.
EVIDENCE	Controlled specification showing product identity, ingredients, grade, dimensions/weight, sensory or physical parameters, tolerances, pack size, storage conditions and shelf life.
AUTHORITY	Buyer specification plus applicable Türk Gıda Kodeksi / Turkish Food Codex and destination-market requirements. The Turkish Food Codex operates under Law No. 5996.

08 Verify formulation and ingredient composition

CHECK	Obtain the complete ingredient formulation appropriate to the product.
WHY IT MATTERS	Ingredients affect additives, allergens, claims, tariffs, destination-market admissibility and label content.
EVIDENCE	Ingredient list; percentages where relevant; additive names/functions; processing aids where disclosure is required; compound-ingredient breakdown.
AUTHORITY	Applicable Turkish Food Codex product/additive rules and destination-market legislation.

09 Establish allergen status

CHECK	Identify deliberately added allergens and relevant cross-contact controls.
WHY IT MATTERS	Destination-market allergen declarations can differ from the supplier’s existing domestic label.
EVIDENCE	Allergen matrix; recipe; raw-material declarations; cross-contact assessment; cleaning/changeover controls where relevant.
AUTHORITY	Destination-market labelling legislation; EU buyers should review Regulation (EU) No 1169/2011 requirements.

10 Verify claims before accepting artwork

CHECK	Treat claims such as organic, halal, gluten-free, origin claims, natural, high-protein or other regulated claims as separate verification points.
WHY IT MATTERS	A product can be manufacturable but the intended marketing claim may not be adequately supported.
EVIDENCE	Claim-specific certification, formulation evidence, testing where appropriate, current scope/validity and destination-market confirmation.
AUTHORITY	Depends on the claim and destination. Never infer claim approval from a generic factory certificate.

11 Define lot-specific analytical requirements

CHECK	Decide which analytical parameters need verification for this product and destination.
WHY IT MATTERS	A generic laboratory report is of little value if it relates to another product, another lot or an irrelevant hazard.
EVIDENCE	Lot-linked Certificate of Analysis and, where justified, an accredited laboratory report identifying sample, test method, date, laboratory and result.
AUTHORITY	Applicable Turkish Food Codex and destination-market contaminant, residue and microbiological rules. Turkey introduced an updated Türk Gıda Kodeksi Mikrobiyolojik Kriterler Yönetmeliği in 2025.

> Buyer note: Hana should not be described as conducting or certifying the laboratory testing; testing is commissioned from an appropriately qualified laboratory where the buyer/importer determines it is required.

12 Verify shelf life instead of accepting the printed date alone

CHECK	Confirm the agreed shelf life, date-coding basis and minimum remaining life at shipment/delivery.
WHY IT MATTERS	A 12-month label statement does not establish that the product supplied to the buyer has the required remaining commercial life.
EVIDENCE	Shelf-life specification; relevant validation or stability data where appropriate; production/expiry coding rules; minimum remaining-life commitment in the PO.
AUTHORITY	Product/destination rules plus buyer specification.

13 Establish storage and transport conditions

CHECK	Define temperature, humidity, light or other storage conditions required from production through delivery.
WHY IT MATTERS	Supplier quality at factory release does not protect a product from temperature or storage abuse later in the chain.
EVIDENCE	Product storage specification; cold-chain requirement where applicable; temperature tolerances; reefer set point; warehouse conditions; logger requirement if specified.
AUTHORITY	Product-specific hygiene and buyer/import-market requirements.

14 Confirm usable lot traceability

CHECK	Ensure finished product can be traced back to the relevant production batch and critical inputs.
WHY IT MATTERS	Traceability must work at the shipment level, not merely exist as a written policy.
EVIDENCE	Finished-goods lot code; batch record; raw-material lot link; packaging lot where relevant; traceability or mock-recall record.
AUTHORITY	Turkey introduced Türk Gıda Kodeksi Gıdaların Ait Olduğu Partiyi Tanımlayan İşaretler veya Numaralar Hakkında Tebliğ (No. 2026/11) governing lot identification.

3 Food Safety Systems, Certifications & Claims

IMPORTANT DISTINCTION

HACCP-based controls, legal food-safety obligations and private certification are not the same thing. For example, EU food-hygiene legislation includes HACCP-based procedures, but this does not mean every supplier must possess a document marketed as a “HACCP Certificate.” Likewise, BRCGS, IFS Food, FSSC 22000 and ISO 22000 can be commercially important, but they should not be presented as universal Turkish export licences.

15 Review the supplier’s food-safety system

CHECK	Determine what food-safety management and hazard-control system actually applies to the proposed production.
WHY IT MATTERS	A certificate logo is not a substitute for understanding the relevant production controls.
EVIDENCE	Food-safety plan/HACCP structure where appropriate; process flow; critical control framework; recent internal/external audit evidence when relevant.
AUTHORITY	Turkish hygiene rules and destination-market legislation; EU Regulation (EC) No 852/2004 is relevant to EU food hygiene.

16 Verify any BRCGS claim

CHECK	If the supplier claims BRCGS certification, confirm the exact site, scope, product category, certificate status and audit grade/status.
WHY IT MATTERS	Certification may cover only specific processes or locations.
EVIDENCE	Current certificate and scope; certification-body details; database verification where available.
AUTHORITY	BRCGS Global Standard Food Safety, Issue 9 remains the current published issue during the 2026 Issue 10 revision process. It is a private certification standard, not Turkish law.

17 Verify any IFS Food claim

CHECK	Match IFS certification to the producing facility and proposed product/process.
WHY IT MATTERS	The existence of an IFS logo does not establish that every production activity falls within scope.
EVIDENCE	Certificate; scope; site details; certification-body information; current IFS status.
AUTHORITY	IFS Food Version 8, a private food-production certification standard.

18 Verify FSSC 22000 or ISO 22000 correctly

CHECK	Confirm certificate version, facility, scope and certification body.
WHY IT MATTERS	Management-system certification does not itself prove that the individual shipment meets its specification or destination-market import requirements.
EVIDENCE	Current certificate; scope statement; facility address; accreditation/certification-body status.
AUTHORITY	FSSC 22000 Version 7 was published on 1 May 2026. ISO lists ISO 22000:2018 as the current published International Standard, with Amendment 1:2024. ISO itself does not perform certification.

19 Verify halal certification only when the requirement exists

CHECK	Confirm both the certifier’s status and whether that certification is accepted by the destination market/customer.
WHY IT MATTERS	“Halal certified” does not mean “accepted everywhere.”
EVIDENCE	Halal certificate; covered products/site/processes; current certification body; accreditation status; destination-country recognition.
AUTHORITY	Turkey’s Helal Akreditasyon Kurumu (HAK / Halal Accreditation Agency) accredits halal conformity-assessment bodies and publishes its current accredited-body directory. HAK is an accreditor, not the product certifier. For Saudi Arabia, SFDA states that meat, poultry and their products entering the Kingdom require halal slaughter certification from designated/recognised bodies.

20 Verify organic status through the actual control system

CHECK	If “organic” will be used, establish the certification chain for producer/processer/product and destination.
WHY IT MATTERS	A historic certificate or certificate from a body whose authorization has changed does not establish current organic status.
EVIDENCE	Current organic certificate; scope/product schedule; certifier; transaction documentation where applicable.
AUTHORITY	Turkey’s Ministry maintains the current Yetkili Kuruluşlar — Kontrol ve Sertifikasyon Kuruluşları list. For EU organic imports, electronic Certificate of Inspection (e-COI) processing takes place through TRACES; without the required e-COI the goods cannot be released as organic.

4 Packaging, Labelling & Private Label

21 Freeze artwork through a formal approval step

CHECK	Establish a controlled artwork revision before printing.
WHY IT MATTERS	Manufacturer, buyer and graphic designer can otherwise work from different label versions.
EVIDENCE	Final approved PDF/artwork; revision/date; approval email or sign-off; printer proof where appropriate.
AUTHORITY	Buyer control plus destination labelling law.

22 Run destination-market label review

CHECK	Review the actual label intended for the buyer's country — not merely the supplier's existing Turkish artwork.
WHY IT MATTERS	Product name, ingredients, allergens, net quantity, nutrition, language, responsible operator/ importer details, date information and claims may be regulated differently.
EVIDENCE	Final label artwork and market-specific compliance review by the responsible buyer/importer or qualified adviser.
AUTHORITY	EU: Regulation (EU) No 1169/2011 governs mandatory food information. Turkey: the Ministry updated its Türk Gıda Kodeksi Gıda Etiketleme ve Tüketicileri Bilgilendirme Yönetmeliği Kılavuzu on 13 March 2026; additional labelling changes are subject to a transition ending 31 December 2026.

23 Check label language

CHECK	Confirm mandatory information can legally be presented in the intended destination language(s).
WHY IT MATTERS	An English-only label may be insufficient in some markets.
EVIDENCE	Market-specific artwork; importer/regulatory confirmation.
AUTHORITY	EU food information must be in a language easily understood by consumers of the Member State, and Member States may require specified official languages.

24 Verify food-contact packaging

CHECK	Identify the material and intended use conditions: food type, contact duration, temperature, heating/freezing conditions and reuse status where applicable.
WHY IT MATTERS	“Food grade” printed on a datasheet is not a complete compliance assessment.
EVIDENCE	Material specification; supplier declaration/compliance statement; migration or other test evidence where required for that material/use; upstream material information.
AUTHORITY	Turkey: applicable Türk Gıda Kodeksi Gıda ile Temas Eden Madde ve Malzemelere Dair Yönetmelik and material-specific rules. EU: Regulation (EC) No 1935/2004 is the framework for food-contact materials; manufacturing is also subject to GMP rules under Regulation (EC) No 2023/2006, with additional material-specific requirements.

> Do not describe a Declaration of Compliance as universally mandatory for every packaging material; the required documentation depends on the material and applicable specific measure.

25 Test packaging against the actual supply chain

CHECK	Confirm seal integrity, barrier properties, carton configuration and transport durability for the product.
WHY IT MATTERS	Packaging that survives a sample courier shipment may fail palletisation, sea freight, freezing, heat or long storage.
EVIDENCE	Approved pack specification; carton/pallet configuration; seal checks; transit test or relevant validation where commercially justified.
AUTHORITY	Buyer specification plus applicable packaging/food-contact requirements.

5 Turkey-Side Export Readiness

26 Identify the correct Turkish export-certificate route

CHECK	Determine the official certificate/procedure for the exact product + destination, if one is required.
WHY IT MATTERS	There is no single universal “Turkish food export certificate.”
EVIDENCE	Applicable official procedure and draft/final certificate.
AUTHORITY	Turkey’s Ministry publishes separate procedures covering, among other things, Sağlık Sertifikası (Health Certificate), Serbest Satış Sertifikası (Free Sale Certificate), Global Certificate and specific export procedures for products/markets including EU dried fruit, cumin, sesame and Great Britain routes.

27 Verify GGBS export processing where applicable

CHECK	For export routes handled through the Ministry’s food system, verify that the operator and shipment can be processed correctly through Gıda Güvenliği Bilgi Sistemi (GGBS).
WHY IT MATTERS	Official certification relies on registered operator/product/shipment information; the system is not replaced by the supplier’s commercial invoice.
EVIDENCE	Supplier confirmation of applicable GGBS export pre-notification/application; relevant provincial Directorate application/certificate documentation.
AUTHORITY	Ministry of Agriculture and Forestry export procedures.

28 Apply importing-country requirements first

CHECK	Ask the supplier to identify the destination-country requirement against which export documentation will be prepared.
WHY IT MATTERS	Turkish domestic compliance does not automatically establish eligibility for the destination.
EVIDENCE	Importer instruction; official model certificate; destination requirement; buyer-approved specification.
AUTHORITY	Turkey’s official export guidance expressly distinguishes importing-country requirements; where destination requirements exist, they govern the export assessment rather than assuming Turkish domestic requirements alone are sufficient.

29 For animal-origin products, identify the veterinary route before PO

CHECK	For poultry and other animal-origin products, verify export eligibility and veterinary certification before commercial commitment.
WHY IT MATTERS	Animal-origin trade frequently depends on country/product/establishment eligibility — not simply factory capability.
EVIDENCE	Approved establishment details where required; applicable model veterinary certificate; current country/product eligibility; cold-chain conditions.
AUTHORITY	Ministry instruction Canlı Hayvan ve Hayvansal Ürünlerin İhracatı İçin Veteriner Sağlık Sertifikası Düzenlenmesi Talimatı.

30 Use the correct origin document

CHECK	Distinguish origin evidence from customs-union/free-circulation documents.
WHY IT MATTERS	A.TR is not a certificate of Turkish origin.
EVIDENCE	Correct origin/preference document for the trade route: e.g. non-preferential Certificate of Origin, EUR.1 where the relevant preferential arrangement requires it, or A.TR where the EU–Türkiye customs-union free-circulation rules apply.
AUTHORITY	Turkish Ministry of Trade. Its official guidance distinguishes Menşe Şahadetnamesi, EUR.1 and A.TR, and states that A.TR demonstrates free circulation rather than origin.

31 Reconcile export documents before shipment

CHECK	Compare product description, quantity, lot, pack count, gross/net weight, manufacturer/exporter and destination across the document set.
WHY IT MATTERS	Individually legitimate documents may still form an inconsistent shipment file.
EVIDENCE	Commercial invoice; packing list; official health/veterinary certificate where applicable; origin/preference document; transport document; CoA and other shipment-specific evidence.
AUTHORITY	Transaction-specific customs/sanitary requirements.

6 Production & Quality Verification

32 Approve a reference sample before bulk production

CHECK	Define what the approved sample represents and preserve its specification/revision.
WHY IT MATTERS	Sample approval has little control value unless it is linked to the subsequent bulk specification.
EVIDENCE	Approved/golden sample reference; sample date; specification version; approved artwork/pack configuration.
AUTHORITY	Buyer quality control.

33 Confirm production capacity against the actual order

CHECK	Test the factory's practical ability to produce the quantity within the claimed schedule.
WHY IT MATTERS	General annual "capacity" does not establish available capacity during the buyer's production window.
EVIDENCE	Production schedule; planned line; batch size; major outsourced operations; realistic start/ completion dates.
AUTHORITY	Commercial/operational due diligence.

34 Control changes after approval

CHECK	Require disclosure of material changes in formulation, raw material, manufacturing site, packaging or processing after approval.
WHY IT MATTERS	An approved product can become materially different without a visible change to the PO description.
EVIDENCE	Written change-control requirement; revised specification; buyer approval before implementation.
AUTHORITY	Buyer governance; certification/regulatory consequences may also apply.

35 Link finished-goods evidence to the production lot

CHECK	Confirm the batch referenced by production, testing, packing and shipment evidence is the batch being released.
WHY IT MATTERS	A valid result from an earlier batch does not establish current-lot conformity.
EVIDENCE	Batch record; lot-specific CoA; test report sample identification; pallet/carton lot codes.
AUTHORITY	Buyer control plus applicable traceability/food-safety requirements.

36 Review deviations and non-conformities before release

CHECK	Ask whether any specification, production, laboratory, packing or documentation deviation remains open.
WHY IT MATTERS	Shipment should not become the point at which unresolved quality issues are discovered.
EVIDENCE	Deviation/NCR record; corrective action; documented buyer disposition where necessary.
AUTHORITY	Supplier food-safety/quality system and buyer release procedure.

7 Product-Specific Due Diligence Modules

A Nuts & Dried Fruits

Turkey's dried-fruit sector exported approximately USD 752 million in January–June 2026 according to the Aegean Exporters' Associations. Separately, Turkey exported 238,704 tonnes of hazelnuts/hazelnut products worth approximately USD 2.255 billion to 119 countries in 2025, according to the Black Sea Hazelnut and Products Exporters' Association. Scale does not remove lot-specific risk.

37 Nuts and dried fruits

CHECK	Establish a product-specific hazard and quality profile covering, as applicable, mycotoxins, pesticide residues, moisture/water activity, sulphites/preservatives, foreign matter, infestation, grade and lot traceability.
WHY IT MATTERS	Risks vary strongly by commodity and destination; a generic "dried fruit CoA" is insufficient.
EVIDENCE	Product specification; lot CoA; appropriate accredited test evidence; pesticide program/supplier declaration where relevant; storage controls; lot traceability.
AUTHORITY	Turkish Food Codex plus destination limits and enhanced-control rules. Current EU example: the consolidated text of Regulation (EU) 2019/1793 applicable from 30 June 2026 — after Annexes I and II were replaced by Implementing Regulation (EU) 2026/1206 — shows dried figs and specified fig products from Türkiye subject to 30% identity and physical checks for aflatoxins and Ochratoxin A. This is exactly why buyers should check the current regulation at shipment time, rather than relying on an old supplier statement.

Added from Hana research: current EU controls (Regulation (EU) 2019/1793, with Annexes I and II most recently replaced by Implementing Regulation (EU) 2026/1206 of 9 June 2026) place specified Turkish dried-fig products under 30% identity and physical checks for aflatoxins and Ochratoxin A, and separately place specified Turkish pistachio products under 50% checks for aflatoxins. These frequencies are revised periodically — buyers should confirm the current control percentage and exact product scope at shipment time rather than relying on a fixed figure.

B Ingredients

38 Ingredients and food-industry inputs

CHECK	Define grade, composition, origin, additive/carrier status, allergens, microbiological/chemical criteria and intended use.
WHY IT MATTERS	"Food grade" alone does not describe suitability for the buyer's formulation or market.
EVIDENCE	Detailed specification; CoA; SDS where genuinely relevant to the material; allergen statement; origin statement; additive/processing-aid declaration.
AUTHORITY	Turkish Food Codex and destination product/formulation rules.

C Beverages

39 Beverages

CHECK	Define product-specific parameters such as soluble solids/Brix, pH/acidity, carbonation, juice content, sweetener/preservative system, alcohol where applicable, pack compatibility and shelf-life conditions.
WHY IT MATTERS	Beverage compliance and stability depend on formulation and processing, not only taste and pack appearance.
EVIDENCE	Formula/specification; process description; applicable analytical results; final artwork; packaging specification; shelf-life evidence.
AUTHORITY	Applicable product-specific Turkish Food Codex provisions and destination rules.

D Packaged / Private-Label Foods

40 Private-label products

CHECK	Make the buyer’s approved specification and artwork — not the supplier’s standard SKU — the controlling commercial reference.
WHY IT MATTERS	Private-label failures frequently arise from uncontrolled substitutions, artwork revisions or pack differences rather than inability to manufacture food.
EVIDENCE	Master specification; golden sample; controlled artwork; packaging BOM; approved MOQ/ production assumptions.
AUTHORITY	Buyer requirement plus destination labelling/food law.

E Food-Service Products

41 Food-service / bulk format

CHECK	Review bulk pack, preparation/use instructions, allergen communication, storage conditions and traceability even if the product will not carry a retail shelf label.
WHY IT MATTERS	Moving from retail to food-service format does not eliminate food-safety or allergen obligations.
EVIDENCE	Bulk-pack artwork/specification; allergen sheet; storage/use instructions; batch traceability.
AUTHORITY	Applicable food-information/hygiene rules in the destination market.

F Poultry & Other Animal-Origin Products

42 Poultry and animal-origin products

CHECK	Before PO, confirm that the country, product category and actual establishment are eligible for the intended destination.
WHY IT MATTERS	A Turkish poultry plant can be commercially capable and still be ineligible for a particular destination/product route.
EVIDENCE	Competent-authority establishment number; destination eligibility/listing; applicable veterinary health certificate; cold-chain specification; lot/production evidence; halal evidence only where required.
AUTHORITY	Turkish veterinary export framework plus destination authority. For the EU, products of animal origin are subject to specific third-country and establishment-eligibility controls. For the United States, meat/poultry/egg-product eligibility must be checked against the USDA FSIS Eligible Foreign Establishments framework; do not assume eligibility from FDA registration or a supplier's general U.S. export claim.

Added from Hana research: EU rules allow third-country poultry eligibility to be managed by country, territory or zone and to reflect disease status, including avian influenza (Commission Delegated Regulation (EU) 2020/692 and Implementing Regulation (EU) 2021/404, Annexes V and XIV — the current framework; Regulation (EC) No 798/2008 was repealed in April 2021). Buyers should therefore confirm the current country/zone and establishment eligibility for the specific production origin before PO, rather than assuming a single national approval status.

G Food-Contact Packaging Sold as a Product

43 Food-contact packaging

CHECK	Identify the precise material, intended food, temperature, duration and conditions of contact.
WHY IT MATTERS	A packaging material may be suitable for one food/use and unsuitable for another.
EVIDENCE	Material composition/spec; Declaration of Compliance where legally applicable; migration/test data appropriate to the material/use; GMP/manufacturing evidence; supplier declarations.
AUTHORITY	Turkish food-contact rules and, for EU destinations, Regulation (EC) No 1935/2004, Regulation (EC) No 2023/2006 and relevant material-specific measures.

8 Destination-Market Gate Checks

44 EU import route — EUROPEAN UNION

CHECK	Classify the product before shipment as ordinary non-animal food, product subject to increased controls, product of animal origin, composite product, organic product, etc.
WHY IT MATTERS	TRACES and border-control requirements do not apply identically to every food shipment.
EVIDENCE	CN/product classification; importer confirmation; applicable official certificate/CHED where required; establishment eligibility for animal-origin products; e-COI for organic where required.
AUTHORITY	European Commission; Regulation (EU) 2017/625 official-controls framework and category-specific rules. TRACES handles sanitary/phytosanitary certification and control workflows including animal products and specified controlled non-animal foods.

> **Buyer rule:** Never write “TRACES required for all Turkish food exports to the EU.”

45 Great Britain import route — GREAT BRITAIN

CHECK	First establish whether the destination is Great Britain (England, Scotland, Wales) or Northern Ireland.
WHY IT MATTERS	The UK should not be treated as one uniform SPS import regime.
EVIDENCE	Importer instructions; commodity risk category; pre-notification requirement; export health certificate/ commercial document where applicable; approved establishment/country position for animal products.
AUTHORITY	For Great Britain, high-risk food/feed — including products of animal origin — can require pre-notification via IPAFFS before arrival; the UK guidance explicitly treats Northern Ireland separately. For animal products from non-EU countries, approved-country/establishment and health-certificate conditions vary by commodity/risk category.

> **Added from Hana research: the UK Food Standards Agency has identified high levels of non-compliance in certain Turkish FNAO commodities and noted that several enhanced import controls have remained in place for years without sufficient evidence of improvement, particularly in relation to pesticide residues — treat FNAO produce from Turkey as a higher-scrutiny category for GB-bound shipments specifically.**

46 FDA-regulated foods — UNITED STATES

CHECK	Confirm the U.S. importer has identified the applicable FDA import route, including facility registration, Prior Notice and FSVP responsibilities where applicable.
WHY IT MATTERS	These obligations sit across the foreign facility, shipment and U.S. importer — not solely with the Turkish supplier.
EVIDENCE	FDA facility-registration information where applicable; U.S. agent information as required; Prior Notice process; identified FSVP importer; importer verification requirements.
AUTHORITY	FDA states imported foods must meet applicable U.S. requirements and applicable foreign food facilities must be registered; imported shipments are also subject to Prior Notice requirements. Under FSVP, the U.S. importer performs risk-based foreign-supplier verification, which can include records review, audits and testing depending on the circumstances.

> Critical U.S. red flag — A supplier statement such as “Our product/factory is FDA approved” should be clarified. FDA itself states it is not authorised to approve, certify, license or otherwise sanction individual food importers, food products, labels or shipments in the way this phrase often implies.

47 Treat MENA as destination-specific — SAUDI ARABIA / GCC / MENA

CHECK	Identify the actual destination authority and importer-registration/product-registration route.
WHY IT MATTERS	“GCC compliant” or “Middle East approved” is not a sufficient import determination.
EVIDENCE	Importer registration; product registration where required; label review; health/halal documentation; foreign-establishment approval where applicable.
AUTHORITY	Saudi Arabia: SFDA operates food-registration/import controls, and its Food Registration System covers establishments/products. For meat/poultry and their products, halal slaughter certification from designated bodies is required. GSO: GSO 2055-1:2015 — Halal Food, Part 1: General Requirements is a real GCC standard, but it should be applied where the relevant market/customer framework calls for it — not presented as a universal rule for every MENA food shipment. UAE example: Dubai Municipality operates food-item registration/assessment and imported-food consignment services, illustrating why MENA procedures must be checked by jurisdiction.

48 Identify EU-member vs national regime — BALKANS

CHECK	Determine whether the Balkan destination operates under the EU framework or a separate national import regime.
WHY IT MATTERS	“Balkans compliant” has no single regulatory meaning.
EVIDENCE	Importer/broker confirmation; national import permit/certificate where required; veterinary/sanitary documentation; establishment eligibility.
AUTHORITY	Example — Serbia: the Veterinary Directorate requires animal-origin imports to meet veterinary-sanitary import conditions, be accompanied by the relevant original international veterinary certificate and undergo border veterinary control.

9 Shipment Release Checklist

49 Confirm finished quantity and packing

CHECK	Reconcile physically completed/packed quantity with the PO and packing list.
WHY IT MATTERS	“Production complete” does not automatically mean the ordered shipment exists in release-ready form.
EVIDENCE	Final packing list; pallet/carton count; lot breakdown; weight reconciliation; photographs or independent physical verification where required.
AUTHORITY	Buyer shipment-control procedure.

50 Match CoA / testing to the shipped lots

CHECK	Verify that analytical evidence actually relates to the lots being loaded.
WHY IT MATTERS	An unrelated or historical CoA creates false assurance.
EVIDENCE	Shipment lot numbers versus CoA/test-report sample IDs and dates.

51 Close outstanding document discrepancies

CHECK	Do not treat “documents will follow” as equivalent to a completed shipment file where documents are required before import/release.
EVIDENCE	Final invoice, packing list, sanitary/veterinary certificate where applicable, origin/preference documents, relevant test/CoA and buyer-required records.

52 For temperature-controlled cargo, establish the handover condition

CHECK	Confirm required temperature before loading and the agreed control after handover.
EVIDENCE	Product temperature where relevant; reefer set point; pre-cooling evidence if required; logger reference; container/trailer condition.

53 Record the final release decision

CHECK	List every remaining OPEN/HOLD item before the buyer releases the shipment.
WHY IT MATTERS	An unresolved point should remain visible rather than disappear into email traffic.
EVIDENCE	One-page shipment-release sheet showing PASS / OPEN / HOLD / N/A and responsible party.

10 High-Value Red Flags

These are triggers for clarification or enhanced verification, not automatic proof of misconduct.

RED FLAG	WHAT THE BUYER SHOULD DO
Supplier refuses to identify the actual manufacturing site	HOLD supplier approval until manufacturing role is clear.
Factory certificate carries a different legal entity or address	Verify whether the proposed product/site is genuinely within scope.
Certificate cannot be confirmed with the scheme/ certification body	Treat it as unverified rather than valid.
Supplier says “FDA approved product/factory”	Ask precisely what registration or FDA requirement they mean; FDA does not generally approve individual imported foods/factories in that sense.
A.TR is presented as proof that goods are Turkish origin	Correct the document logic; A.TR proves free circulation, not origin.
Halal certificate is described as “accepted worldwide”	Verify certifier/accreditation and destination-country recognition.
CoA has no identifiable lot/batch	Do not use it to release the current shipment.
Test report predates production and has no clear sample link	Determine whether it is specification/reference data rather than current-lot evidence.
Private-label artwork changes after approval	Freeze production/printing until revised artwork is approved.
Bank beneficiary does not match the contracting entity	Obtain documentary explanation before payment.
Quoting exporter cannot explain manufacturer relationship	Clarify counterparty, warranty and traceability responsibilities.
Animal-origin supplier says “we export everywhere”	Check exact country/product/establishment eligibility before PO.
Private certification is offered as proof of legal import eligibility	Separate BRCGS/IFS/FSSC/ISO evidence from government import eligibility.
Cold-chain product has no agreed transport temperature/control record	Treat shipment readiness as unresolved.
Current regulatory control is dismissed because “we have exported it before”	Verify current rule. Controls can change: the EU increased controls on Turkish dried figs because of documented mycotoxin non-compliance.
Fresh produce supplier has no pesticide program on record	Added from Hana research — Turkish fresh-produce categories such as peppers and tomatoes are currently subject to EU enhanced official controls for pesticide residues under Regulation (EU) 2019/1793 (as most recently amended by Implementing Regulation (EU) 2026/1206). Ask for the specific pesticide-use program before accepting fresh-produce sourcing on trust, and

	confirm the current control frequency for the specific product at shipment time.

RESEARCH NOTE ON "FOOD FRAUD"

This checklist does not state that Turkish food exports have a general or systemic "food fraud problem" — that broad claim is not supported by the primary sources reviewed. It does include specific, source-backed risk examples: documented mycotoxin non-compliance in specified Turkish dried-fig consignments, recurring pesticide-residue notifications on fresh produce, and terminology (such as "FDA approved") that is frequently misstated commercially. These are due-diligence flags, not an allegation about Turkish suppliers as a class.

11 Three Release Gates

The operational summary of this document — do not proceed past a gate until its conditions are met.

GATE 1 — Before PO / deposit	Legal seller identified; actual factory identified; facility registration/approval checked; destination eligibility assessed; specification fixed; critical certifications/claims checked; MOQ/ lead time/payment basis agreed.
GATE 2 — Before production	Sample/reference approved; specification revision locked; artwork approved; packaging confirmed; production site/schedule confirmed; critical testing/document plan agreed.
GATE 3 — Before shipment release	Actual lots identified; quantity/packing reconciled; required CoA/testing available; official export/import documents aligned; cold-chain position confirmed where relevant; deviations recorded; all HOLD items closed or consciously accepted by buyer.

A supplier should not be approved only because the company exists, and a shipment should not be released only because the factory says production is complete.

Scope Boundary

This checklist is a buyer-side due diligence reference and does not constitute legal, regulatory, laboratory, certification, customs or veterinary advice. Requirements depend on the specific product, ingredients, processing method, HS/CN classification, manufacturing establishment, destination market and intended claims. Buyers and importers should confirm applicable legal requirements with the relevant competent authority or appropriately qualified professional before import or market placement.

Hana Solution LLC does not issue food-safety certificates, laboratory results, regulatory approvals or customs clearances. Where testing, inspection, certification or regulatory interpretation is required, the appropriate qualified third party should be appointed.

§ Source Register — Verified Working Sources

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5. Türk Gıda Kodeksi Mikrobiyolojik Kriterler Yönetmeliği — Kodeks çalışmaları, Oct 2025 — tarimorman.gov.tr/GKGM (Kodeks Çalışmaları)
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3. BRCGS Global Standard Food Safety, Issue 9 — brcgs.com/our-standards/food-safety
4. IFS Food Standard, Version 8 — ifs-certification.com
5. FSSC 22000 Version 7 — fssc.com/fssc-22000/documents/version-7-documents
6. ISO 22000:2018 + Amendment 1:2024 — iso.org/standard/65464.html

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2. European Commission — Food Safety / Official Controls — food.ec.europa.eu
3. European Commission — Food Hygiene Legislation — food.ec.europa.eu/food-safety/biological-safety/food-hygiene
4. Regulation (EU) No 1169/2011 — Food Information to Consumers — eur-lex.europa.eu — Reg. 1169/2011
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6. Regulation (EU) 2019/1793 — consolidated text applicable from 30 June 2026 — eur-lex.europa.eu — CELEX 02019R1793 (30 Jun 2026)
7. Implementing Regulation (EU) 2026/1206 of 9 June 2026 — replaced Annexes I & II of Reg. 2019/1793, incl. Turkish dried figs (30%) & pistachios (50%) — eur-lex.europa.eu — Reg. 2026/1206
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UNITED STATES

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4. FDA — Registration of Food Facilities — fda.gov — Food Facility Registration
5. USDA FSIS — Import & Export / Eligible Foreign Establishments — fsis.usda.gov/inspection/import-export

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