Federation of the European Sporting Goods Industry

FESI Position Paper

TRADE BARRIERS AFFECTING SPORTING GOODS COMPANIES IN THE TURKISH MARKET

January 2026

Summary:

1. Introduction

The Federation of the European Sporting Goods Industry (FESI) represents over 1,800 sporting goods manufacturers across Europe, including many small and medium-sized enterprises. Our members are highly globalised, operating through integrated supply chains and relying on smooth and predictable access to international markets.

Türkiye plays a dual strategic role for our industry. On the one hand, it is an important manufacturing hub and sourcing location. On the other hand, it represents a significant and growing consumer market for sporting goods, with increasing demand for international brands and innovative products. For many FESI members, Türkiye is both a key production partner and a priority export destination.

However, and despite the existence of the EU-Türkiye Customs Union, European sporting goods companies continue to face considerable market access barriers in Türkiye. These barriers are both tariff and non-tariff in nature and significantly affect our members' ability to trade effectively, increasing costs, delaying deliveries, and sometimes preventing access to the Turkish market altogether.

FESI is grateful for the ongoing support provided by the European Commission in raising these concerns with Turkish counterparts. In this paper, we outline seven key trade barriers currently impacting our members, detailing their effects and respectfully submitting our policy asks to help mitigate or remove these obstacles.

2. Additional customs duties on sporting goods products

a) Overview of the measure

Since August 2014, Türkiye has imposed additional customs duties on footwear and apparel imports ranging from 30% to 50%. Although products manufactured in the EU, EFTA countries or those covered by Turkish FTAs are exempt, products originating from third countries but lawfully released into free circulation in the EU are still targeted.

b) Legal basis

Initial imposition under the Presidential Decree of August 2014; most recent update published in the Official Gazette on 31 December 2024 (2024/12/31M3-2).

c) Impact on the sporting goods industry

These duties violate key provisions of Decision No. 1/95 of the EC-Türkiye Association Council, notably Articles 3 and 4 on free movement and prohibition of duties with equivalent effect and contradict the spirit of tariff harmonisation and customs cooperation (Articles 13, 16, and 57). The measure results in high costs, planning uncertainty, and, in some cases, market withdrawal. It penalises legitimate trade and disproportionately affects companies with diversified supply chains.

d) Policy asks

- We urge the European Commission to press for the removal of these additional customs duties, which contradict the EU-Türkiye Customs Union framework.
- We ask the Commission to consider initiating WTO dispute procedures if bilateral engagement does not lead to resolution.
- We recommend that the revised EU–Türkiye Customs Union include a robust and effective dispute settlement mechanism to ensure timely resolution of trade-related conflicts.

3. Pre-import TAREKS inspections on apparel and footwear

a) Overview of the measure

Türkiye enforces pre-import controls under its Risk-Based Trade Control System (TAREKS) for goods in Chapters 41–64 of the Harmonised System, requiring prior authorisation through a multi-step process. Goods without an ATR certificate (i.e., from outside the EU) are almost systematically subjected to testing; since September 2023, even some ATR-accompanied goods have been targeted.

b) Legal basis

Communiqué 31297/2020, effective from 1 January 2021.

c) Impact on the sporting goods industry

TAREKS inspections have a material operational and financial impact on sporting goods companies, with significant variability over time. Based on aggregated and anonymised member data covering the last 12 months, inspection selection rates and processing times have fluctuated substantially, making compliance costs and delivery timelines difficult to anticipate.

Over a 12-month period, members reported inspection rates ranging from as low as 3–9% in certain months to peaks of 30–79% during periods of intensified controls. On average, approximately 25–26% of submitted TAREKS applications were selected for inspection over the year. Seasonal spikes were particularly pronounced between mid-January and mid-March, when inspection rates increased sharply across multiple product categories.

- Most goods without ATR certificates are selected for inspection.
- All model numbers on an invoice are subject to control; testing costs range from USD 200–500 per model.
- If test results are negative, goods must be re-exported or redirected.
  Importers must book sampling dates (3–7 days), prepare models at bonded warehouses (1–2 days), and await laboratory testing (3–4 days) and customs review (1–5 days).

While ATR certificates do not formally exempt shipments from TAREKS requirements, member experience indicates a clear differentiation in practice.

Over the same 12 month period, shipments accompanied by ATR certificates represented a small share of total imports and none of these ATR-covered shipments were selected for inspection, suggesting that ATR documentation materially reduces inspection risk.

During peak periods, inspection rates reached or exceeded 30% of shipments for certain operators, while in extreme cases individual months saw inspection rates approaching 80%, compared to below 10% in low-intensity months.

In addition, importers must now have testing documentation ready prior to shipment. Testing is based on Turkish safety requirements for chemicals.

Across inspected shipments, the average duration of the TAREKS process has been approximately 36 calendar days, measured from the date of application to final approval in the system. This duration reflects cumulative delays at multiple stages, including:

- approximately 10 days for inspector appointment,
- around 10 days for physical inspection and sampling at bonded warehouses,
- and a further 10 days for laboratory testing, reporting, and final administrative approval.

Members also report recurring requests for additional samples after initial testing (on average two to three cases per month), further extending clearance timelines beyond four to six weeks. The absence of legally binding deadlines for inspectors and the lack of an appeal mechanism in cases of excessive delay exacerbate uncertainty and disrupt supply chains, particularly for time-sensitive or limited-quantity products.

Overall, the unpredictability of inspection selection, combined with extended and variable processing times, creates significant challenges for inventory planning, seasonal product launches, and contractual delivery commitments.

d) Policy asks

- We call on the Commission to work with Turkish authorities to increase transparency and predictability of the TAREKS process.
- We ask for exemption of EU-origin goods (with ATR certificates) from TAREKS testing.
- We recommend adopting risk-based models in line with EU practice to streamline controls.
- We also request that test reports issued by internationally accredited laboratories be accepted as valid for compliance purposes.

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4. Lack of transparency in customs valuation

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a) Overview of the measure

Turkish customs authorities frequently override declared transaction values in favour of opaque reference pricing without clear justification or appeal mechanisms.

b) Legal basis

Contravenes the WTO Customs Valuation Agreement and Decision No. 1/95 (Art. 3 and 4).

c) Impact on the sporting goods industry

Unexplained adjustments in valuation lead to increased duties and delay clearance. Companies are unable to anticipate import costs or dispute customs decisions. The lack of predictability reduces trust and discourages market entry.

d) Policy asks

- We urge the Commission to call on Türkiye to align its valuation practices with WTO rules.
- We ask for the introduction of transparent procedures and written justifications for customs valuations.
- We propose a dialogue to clarify rules and ensure consistency with EU trade practices.

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5. Labelling requirements for paired PPE products

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a) Overview of the measure

Turkish authorities require CE marking on each item of paired PPE products (e.g., gloves, shin guards), rejecting shipments where only one item is marked, even though the products are sold and certified as a pair.

b) Legal basis

No explicit clause in Regulation (EU) 2016/425, but EU practice under the Textile Labelling Regulation and the Footwear Labelling Directive supports single labelling for items sold as a pair.

c) Impact on the sporting goods industry

This requirement creates unnecessary cost and complexity, without enhancing safety. Environmental impact is also notable for high-volume items. Divergent interpretation from the EU approach creates legal uncertainty and market entry risks.

d) Policy asks

- We call on the Commission to confirm that paired items can bear a single CE mark.
- We request EU-Türkiye alignment and guidance based on relevant EU legislation.
- We encourage discussion within the PPE Expert Group to promote uniform interpretation.

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6. Species- specific labelling for products containing animal-origin materials

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a) Overview of the measure

Since 9 June 2025, Türkiye requires species-specific labelling for all consumer products containing parts of animal origin. Our understanding is that the measure is primarily driven by religious considerations. The requirement applies to physical goods (with similar requirements for e-commerce offers), and information must appear on the product, its packaging, or accompanying documentation.

Based on current implementation practices, compliance checks appear to be carried out primarily through post-import market surveillance and consumer protection controls, rather than systematically at the customs clearance stage.

b) Legal basis

Communiqué 2025/18 and supplementary guidance.

c) Impact on the sporting goods industry

The regulation imposes high compliance costs, especially due to the short lead time and lack of clarity on format and placement. Non-compliance may result in fines ranging from TRY

138,498 to 1,384,989 (approx. €3,000–€31,000). The post-import nature of enforcement creates legal and commercial uncertainty, as non-compliance identified during market surveillance may require retroactive corrective actions, including re-labelling, product withdrawal, or administrative penalties. This uncertainty increases compliance risks and operational costs for companies active on the Turkish market. Generic website disclaimers are not accepted, and each SKU must carry distinct species information.

While we welcome the recent release of government guidance, it still leaves critical questions unanswered, including:

- Timing: Must labelling be completed before or after importation?
- Placement: Should the information appear on the product, packaging, in-store?
- Enforcement: Which authorities will oversee compliance? How will sample testing be conducted? What enforcement actions can be expected for non-compliant goods – seizure, destruction, or withdrawal from the market?

d) Policy asks

- We urge the Commission to request a postponement of at least 18 months.
- We call for formal technical guidance to clarify acceptable labelling practices – done in consultation with the business community.
- We propose the use of digital labelling options and streamlining under Turkish consumer law provisions.
- Alternatively, we propose limiting the scope of the regulation to products containing pigskin leather only

7. Reduction of the de minimis threshold and new e-commerce restrictions

a) Overview of the measure

As of 21 August 2024, Türkiye reduced its de minimis threshold from €150 to €30, significantly narrowing the scope of the low-value exemption.

This regime was further tightened following a Presidential Decree published in the Official Gazette on 7 January 2026, which eliminated the low-value customs exemption entirely. As a result, all goods ordered from abroad via postal or express delivery channels, regardless of value, are now subject to standard customs procedures, including customs duties, VAT, and other applicable import taxes.

Once implemented, even very low-value shipments require ordinary customs clearance procedures, often necessitating the use of customs brokerage services. In addition, a flat-rate customs tax applies to goods brought by passengers with a value of up to €1,500, set at 30% for goods arriving directly from EU countries and 60% for goods from non-EU countries. Products listed under Turkey's Special Consumption Tax Law (List IV) are subject to an additional 20% tax.

b) Legal basis

Presidential Decree published in Official Gazette No. 32624 (6 August 2024); amendment to Customs Law No. 4458.

Presidential Decrees published in the Official Gazette on 6 August 2024 and 7 January 2026, amending the Regulation implementing Customs Law No. 4458, including Article 126(1), and repealing the low-value customs exemption for goods ordered from abroad.

c) Impact on the sporting goods industry

These measures have a disproportionate effect on SMEs and online retail channels.
Successive tightening of the e-commerce regime fundamentally alters the viability of cross-border direct-to-consumer business models, as even small-value shipments are now subject to full customs formalities. The resulting administrative burden and compliance costs disproportionately affect SMEs and smaller online operators, potentially discouraging legitimate cross-border e-commerce.

d) Policy asks

- We urge the Commission to highlight the disproportionate burden on SME e-commerce operators.
- We call for clarification of valuation rules, especially regarding undocumented shipping costs.
- We recommend establishing a bilateral discussion platform on e-commerce within the Customs Union modernisation talks.

8. Surveillance implementation based on registration document during importation

a) Overview of the measure

Importers register information regarding the imports they will make on the “italat.ebirlik.org” website of the Istanbul Textile and Apparel Exporters’ Association, which is authorized as the Registration Center by the Ministry of Trade, before importing. A Registration Certificate is issued electronically to indicate that the import transaction has been recorded. In the registration of customs declarations for the products to be registered, regardless of origin, the number given electronically within the framework of the Single Window System regarding the issuance of the Registration Certificate must be recorded by the importer in the 44th column of the customs declaration.

b) Legal basis

Communiqué on the Implementation of Surveillance in Imports (No: 2020/9)

c) Impact on the sporting goods industry

The impact of the surveillance and reference price system varies by product category. However, importation below the reference value specified in the registration document is not permitted, and declared transaction values may be adjusted upward to the applicable reference price at the time of importation.

Recent updates to reference prices have resulted in concrete duty increases for specific product categories. In particular, reference prices for apparel (Chapter 62) have been increased by approximately 20%, while reference prices for bags (Customs Tariff Position 42.02) have increased by approximately 10%. Reference prices for footwear have remained unchanged.

As customs duties are calculated on the adjusted customs value, these increases directly raise import costs and further undermine predictability and cost planning for companies placing goods on the Turkish market.

d) Policy asks

- To ease import tax burdens, we urge the Commission to call on Türkiye to align its valuation practices with WTO rules.
- This situation creates difficulties in terms of cost planning, since the reference price in the registration document is determined at the stage of import of the products and this reference value cannot be known by the importer until the moment of import. Therefore, we ask for the introduction of transparent procedures to know the reference value before the import process.

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9. Conclusion

The barriers described in this paper (from additional tariffs and opaque inspections to excessive labelling and e-commerce restrictions) are deeply disruptive to legitimate EU-Türkiye trade. They undermine the functioning of the Customs Union, disproportionately affect SMEs, and reduce the competitiveness of European sporting goods companies.

FESI respectfully calls on the European Commission to:

- Engage with Turkish authorities to remove or ease these barriers,
- Raise systemic concerns through bilateral channels and WTO mechanisms where appropriate,
- Include those trade irritants as key discussion points in the future revision of the EU-Türkiye Customs Union agreement.

FESI remains committed to supporting a rules-based trading environment and stands ready to contribute further evidence or input as needed.

Federation of the European Sporting Goods Industry

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National member Sporting Goods Industry Federations and its directly affiliated companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.

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