COUNCIL OF EUROPE

CONSEIL DE L'EUROPE

T-MEDICRIME(2021)01
16 June 2021

MEDICRIME COMMITTEE

Committee of the Parties to the Council of Europe Convention on the counterfeiting of medical products and similar crimes involving threats to public health (CETS No. 211)

Questionnaire for the 1st thematic monitoring round:

The protection of public health through the MEDICRIME Convention in times of pandemics

As adopted by the MEDICRIME Committee on 27 May 2021

Replies should be addressed to the MEDICRIME Committee Secretariat

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by 30 November 2021

Introduction

1. The Council of Europe Convention on the counterfeiting of medical products and similar crimes involving threats to public health (hereinafter "the MEDICRIME Convention" or "the Convention"), which entered into force on 28 October 2011, requires the criminalisation of offences set out in the Convention in Articles 5-8. It sets out that states, in Europe and beyond, shall adopt specific legislation to prevent and combat threats to public health by criminalising certain acts, protecting the rights of victims of the offences established under the Convention, and promoting national and international co-operation.

2. The Committee of the Parties to the Convention (also known as the "MEDICRIME Committee"), established to monitor whether Parties effectively implement the Convention (Rule 25 of the Committee's Rules of Procedure), decided that:

> *"3. The monitoring round shall be initiated by addressing a questionnaire on the implementation of the relevant provisions of the Convention with respect to the selected theme. The Parties shall respond to the questionnaire within the time limit set by the MEDICRIME Committee."*

3. As available data show that offences involving medical products committed during a pandemic target critical funding through fraudulent scams, counterfeiting of vital protective personal equipment and critical medical devices to save lives and to detect the presence of the disease, and attacks on critical infrastructure in the fight against the disease, the MEDICRIME Committee decided that the first monitoring round would focus on "The protection of public health through the MEDICRIME Convention in times of pandemics".[1]

4. On 27 May 2021, the MEDICRIME Committee adopted this thematic questionnaire. Its purpose is to collect specific information on how Parties implement the MEDICRIME Convention with respect to offences involving medical products and similar crimes involving threats to public health and related to a pandemic. The replies to the questionnaire will be assessed against the related background information provided by the Parties when answering the "General Overview" questionnaire on the implementation of the MEDICRIME Convention (hereinafter "Country Profile Questionnaire" or "CPQ") and any other relevant information from reliable sources.

5. It is recalled that, in accordance with Rule 26 of the Committee's Rules of Procedure:

[1] Committee of the Parties of the MEDICRIME Convention, *List of decisions*, 3rd Plenary meeting (1-3 December 2020), T-MEDICRIME-(2020) LD, paragraph 4.5.

"(…) 2. The secretariat shall address such questionnaires to the Parties through the member in the MEDICRIME Committee representing the Party to be monitored and who will act as "contact point".
3. Parties shall co-ordinate with their respective domestic authorities to collect replies, which shall be submitted to the secretariat in one of the official languages of the Council of Europe within the time limit set by the MEDICRIME Committee. The replies to the questionnaires shall be detailed, as comprehensive as possible, answer all questions and contain all relevant reference texts. The replies shall be made public, unless a Party makes a reasoned request to the MEDICRIME Committee to keep its reply confidential.
4. The MEDICRIME Committee may also receive information on the implementation of the Convention from non-governmental organisations and civil society involved in preventing and combating the counterfeiting of medical products and similar crimes involving threats to public health, in one of the official languages of the Council of Europe and within the time limit set by the MEDICRIME Committee. The secretariat transmits these comments to the Party or Parties concerned.
5. The secretariat may request additional information if it appears that the replies are not exhaustive or are unclear. Where warranted, with the consent of the Party or Parties concerned and within the limits of budgetary appropriations, the bureau may decide to carry out an on-site visit to the Party or Parties concerned to clarify the situation. The bureau shall establish guidance as to the procedure governing the on-site visits."

PRELIMINARY REMARKS

6. As in the country profile questionnaire, the provisions of the MEDICRIME Convention have been grouped under different sections in this questionnaire without automatically following the structure of the Convention. This methodological choice in no way intends to prioritise the various provisions of the Convention: equal importance is attached to all rights and principles therein.

7. This thematic questionnaire does not seek to collect information on the general legislative and institutional framework established by Parties to implement the Convention. It focuses only on specific legislative and other measures taken or envisaged to protect public health from counterfeiting of medical products and similar crimes in the context of pandemics.

8. Responses to this thematic questionnaire will be understood against the background information submitted by Parties in reply to the CPQ. Whenever warranted, Parties are invited to refer to such information. Where questions overlap between the CPQ and this questionnaire, the replies to the latter will be assessed by the Committee in order to prepare its implementation reports of the Convention with respect to the monitoring theme.

9. For the purpose of this questionnaire, the notion of pandemic will include the COVID-19 pandemic as well as other major health crises declared by the World Health Organisation as pandemics, epidemics or public health emergencies of international concern (PHEIC), including the Zika virus epidemic in 2015, the Ebola pandemic in 2014, the Middle East Respiratory Syndrome (MERS) in 2012, the H1N1 Influenza pandemic in 2009, the H5N1 outbreak in 2005, and the severe acute respiratory syndrome (SARS) in 2003.

10. If there are differences with the information provided in the responses to the CPQ, Parties are kindly requested to specify which State bodies/agencies and, where relevant, NGOs, contributed to responding to this questionnaire.

11. As with the CPQ, Parties are kindly requested to:

    a. answer the questions regarding central, regional and local levels, to the extent possible. Federal states may, in respect of their sovereign entities, answer the questions in a summarised way;
    b. provide the relevant text (or a summary thereof), in English or French only, whenever questions/answers refer to legislation or other regulations;
    c. respond to all questions marked **mandatory** as they are essential to the monitoring round. It would be appreciated, where possible, if all questions marked **optional** could also be answered.

Prevention and Training

This section aims to collect information on policies, strategies, plans and activities to prevent counterfeit medical products and similar crimes involving a threat to public health, in particular during times of pandemics. The questions concern all those whose responsibilities it is to procure and supply medical products, and those who encounter them or their impact on public health. This section concerns awareness-raising programmes aimed at these people in particular, as well as the public in general. It concerns prevention measures aimed at raising awareness of the availability of counterfeit medical products.

Question 1. **(mandatory)**

Which legislative, policy, strategic and other measures have been taken to provide training with a view to preventing counterfeit medical products, active substances, excipients, accessories, parts and materials to:

a. those involved in both public and private procurement programmes, wholesalers, and distributors of medical products to ensure that they are competent to prevent and detect counterfeit medical products and conducts that contribute to the commission of similar crimes involving threats to public health, having regard to the impact of a pandemic (Article 18.1, 2 and 3. a and c)?
b. healthcare practitioners, police, customs, and health product regulators?
c. specialised investigation units/bodies in the investigation of counterfeit medical products and similar crimes, in specialised techniques, including financial investigations (Article 16.2)?

Answer

a. Manufacturers and importers are under the obligation to register all medicinal drugs in the Medicine Tracking System (*İTS*) and all medical equipment in the Product Tracking System (*ÜTS*) of the Ministry of Health. For medicinal drugs manufacturer information, production and expiry dates, serial numbers and unique product barcode, whereas for medical equipment images of actual products, packages, label information, unique product identifier information, manuals and certificates are uploaded in the system. These products can also be tracked to the end user on the basis of lot/serial number.

   Business/corporations which procure medical devices in this context, public institutions and organizations as well as medical professionals using these products are able to compare the products through the ÜTS if they have any doubt regarding the products they procure or use.

   Moreover, within the framework of the trainings organized by the Ministry of Health for medical professionals and corporations, information is provided on obligatory labelling information on packages, symbols, expiry dates, lot/serial number information and as to how the products can be checked on the ÜTS.

b. The personnel who are in charge of overseeing the import of medical devices in customs zones also actively use the ÜTS system explained above. Trainings are provided as well in the relevant institutions on the use of this system.

Moreover, customs enforcement officers are provided with training on medicinal drugs and medical equipment along with information on counterfeit products.

Online in-house trainings in terms of customs enforcement of intellectual property rights (IPR) have been held for customs staff from different customs directorates in order to improve enforcement measures to efficiently fight against IPR infringements in Turkish Customs. The Pharmaceutical Security Institute and multiple trademark owners of medical products and/or their representatives have also participated to all of the mentioned online in- house trainings.

In substance, in-house trainings regarding to customs enforcement of IPR are definitely embraced in the annual training program of Turkish Customs Administration. Besides, medical products, active substances, excipients, accessories, parts and materials are included in the aforementioned trainings with a view to preventing counterfeit.

c. The investigation and oversight of the said products are realized by the qualified inspectors and oversight officers affiliated with the Ministry of Health. In addition to offering pre-service training for the newly-recruited staff members, periodic training continues and up-to-date information is shared relating to the product categories they oversee.

Question 2. **(optional)**

Are there any oversight programmes to assess the frequency and effectiveness of the training provided? If so, are there revision programmes to ensure remedial actions of any deficiencies (Article 18.1, 2 and 3. a)?

Answer

There are no existing oversight programmes to assess the frequency and effectiveness of the training provided. Trainings are organized upon request by the relevant sectors and institutions.

Question 3. **(mandatory)**

Are there awareness-raising and training programmes for all of those mentioned in question 1.a and b above and for persons and entities responsible for cleaning and waste disposal on the disposal of medical product waste at all stages of the process to prevent the recycling of medical products for the further manufacture of counterfeit medical products and instrumentalities used in the counterfeiting of medical products?

Answer

Although awareness-raising and training programmes have not been planned for those mentioned in the relevant sections;

Pursuant to the Regulation on Waste Management, put in force on 02.04.2015, the disposal of counterfeit or smuggled medicinal drugs or those taken out of the context of the supply

chain shall be made at the certified waste centers authorize by the Ministry of Environment, Urbanization and Climate Change. As regards those products that have been submitted by provincial health directorates for an investigation by the court or public prosecutor, following the conclusion of the judicial proceedings, the required authorization shall be obtained from the relevant authorities for their disposal to ensure public health, following which the disposal is made. In this context, medical products which are set out for disposal cannot be reused or recycled. Information is provided in the correspondence made with the medical sector representatives and public institutions and organizations that no product removed from the supply chain can be used, citing the relevant legal framework.

As regards medical equipment, the definition and requirements of safe product are referred to in the correspondence made with public institutions and organizations. The concerned are informed that products which are not compatible with the above-mentioned terms shall not be used.

Having been presented in December 2019, The EU Green Deal refers to some junction points for **sustainability, consumption and consumer protection**.

The document assesses the sustainability process as a whole and underline the importance of measures regarding **consumption** as much as the **production** stage and other socio-economic and administrative aspects.

Circular Economy Action Plan is one of the sources the European Green Deal is based upon and these two documents both stress the measures to encourage businesses to offer, and to allow **consumers to choose, reusable, durable and repairable products.** Respective **labelling requirements, 'right to repair'** and **built-in obsolence of devices** are amongst the issues to be focused on in the upcoming period. **Empowering consumers** to make informed decisions and become *active elements of the ecological transition*, *building public policies helping consumers attaining such a position* and promoting new models on ***renting and sharing economy options*** are accepted as other complimentary steps in achieving a more sustainable environment.

Market surveillance is an integral part of consumer protection and environmental policy, especially for achieving a **toxic-free environment** and this aspect has been addressed by the European Green Deal by means of highlighting the EU's need to better monitor, report, prevent and remedy pollution from air, water, soil, and **consumer products**, *surveillance of which is handled by the DGCPMS in Türkiye.*

Türkiye commenced the work on adapting to the European Green Deal with the preparation of a national **'Green Deal Action Plan'**. Having been mainly based on the **11th National Development Plan** remarks on **mitigating climate change, green development, restrictions on emission, finance options for green economy, inhabitable environment, sustainable cities**, *2021 Presidential Annual Programme, New Economic Programme (2021-23), The Strategy Plan of the Ministry of Trade* and other macro level strategic documents not referred to here for relevancy constraints; the Action Plan puts forward **9 policy titles** including ***'Green and Circular Economy', 'Climate Change'*** and ***'The European Green Deal Awareness Raising Activities'***, **32 targets** and **81 actions**.

The Directorate General of Consumer Protection and Market Surveillance (DGCPMS), actively involves in the implementation of this action plan and is entitled to conduct the action on preparing a '**National Sustainable Consumption Action Plan'** in coordination with the Ministry of Environment, Urbanization and Climate Change as a part of the broader strategy. The DGCPMS will strive to complement the work carried out under ***Current Situation Study***

for the Preparation of Sustainable Consumption and Production National Action Plan (STU-UEP) and Roadmap Project of the MoEUCC with a *consumer protection* perspective. To facilitate and deepen the work on certain policy fields, the Ministry of Trade created a number of *'specialized commissions'* and **the DGCPMS acts as the responsible coordinating body** for the work to be conducted under the **'Specialized Commission on Sustainable Consumption'**. The instructions regarding the establishment, working and reporting principles and functions of the commissions have been defined and disseminated to the relevant institutions for a variety of sectors ranging from construction to textile. The National Sustainable Consumption Action Plan is envisaged to be prepared with the contribution of relevant public authorities, academia, business and civil society representatives and involve actions *on improving the legal infrastructure to empower the consumers, strengthen enforcement, integrate soft policy tools to the repertoire, raise awareness by both helping consumers getting informed and collaborative solid actions in the field incorporating contributions from business and civil society representatives*. It is also planned to carry out **information and awareness-raising activities** with the participation of **all relevant institutions** in order to evaluate the Green Deal and to encourage the harmonization of our country.

Question 4. **(optional)**

Please outline any reviews on the effectiveness of the governance and supervision of medical product waste disposal. Are there any awareness-raising programmes on the importance of proper disposal and the risks that can arise from inadequate governance and supervision?

Question 5. **(optional)**

Apart from the above-mentioned general measures, please briefly describe the details of specific preventive actions targeted at specific medical products involved in any recent pandemic as well as the results achieved.

Education

This section aims at identifying measures aimed at educating civil society on good practices in avoiding the risks associated with counterfeit medical products.

Answer

Awareness-raising posts are published through the official social media accounts of the Ministry.

With a view to protecting public health and prevent counterfeiting during the COVID-19 pandemic, the analysis of PCR tests have been made obligatory before their supply to the market, which analyses have been made in public laboratories. In addition, nationwide mask controls have been made, where protective face masks have been analysed as to their compatibility with the standards.

Question 6. **(mandatory)**

Please elaborate on the strategies, policies and other measures that have been planned or implemented, with a view to educating the public on risks associated with counterfeit medical products, in particular those that may be encountered during a pandemic (Article 18.3.b):

a. on purchasing conducts of medical products, including through real world/physical and virtual means, such as online and e-commerce platforms and social media;
b. on promoting good purchasing conduct among the public to encourage rational consumption of medical products and avoiding procurement from sources that are not within your country's authorised supply systems;
c. on developing and delivering risk awareness campaigns regarding counterfeit medical products and similar crimes.

Are there any reports on the results of these measures? If so, please attach them to your responses to this questionnaire.

Answer

a. According to applicable laws, medicinal drugs cannot be sold on the internet or through other electronic means. Medicinal drugs are exclusively served in pharmacies for the use of patients and websites cannot be opened in the name of pharmacies. The sale of medical equipment designed for use by medical professionals through e-commerce website and social media platforms is prohibited. Excluding these products, online sale can be made by authorized dealers.

   Mobile applications of the registry systems for medicinal drugs and medical equipment are available, which enable people to check the authenticity of all products they have purchased.

b. Within the framework of promoting rational use of drugs, awareness-raising activities are made to encourage using doctor-prescribed drugs under the counselling of pharmacists. In this context, information is provided on Rational Drug Use social media accounts by the Ministry of Health.

   Moreover, it is an obligation that all medicinal drugs be registered in the *İTS* and medical equipment in the *ÜTS* systems, which allow people to make queries through the website or mobile application. Training has been provided in this respect to consumers by the Ministries of Health and Trade.

c. During the meetings organized by the Ministry of Health, participants from public institutions and organizations and sector representatives are informed on legal supply chain and products. Furthermore, information is provided for the public on the official website and social media accounts of the Ministry of Health.

Question 7. (optional)

Do public authorities have a policy to encourage or support the involvement of civil society (such as industries, publishers, academia, etc.) in the promotion of measures to combat, prevent, detect and respond to counterfeit medical products during a pandemic, or in a more general context? If so, please provide details.

Answer

Within the context of its pledge to combat, prevent, detect and respond to counterfeit medical products, the Ministry of Health is in contact with civil society organizations such as Union of Turkish Pharmacies, Chamber of Pharmacies, and All Pharmacy Employers' Labor Union. Collaboration is particularly realized on preventing the entrance of counterfeit products to the supply chain and eliminating online drug sale.

Question 8. (optional)

Is civil society actively engaged in raising public awareness of the risks arising from counterfeit medical products (Article 18. 3, b)? If so, please provide details.

Answer

Civil society organizations (Union of Turkish Pharmacies and affiliated Chambers of Pharmacies, All Pharmacy Employers' Labor Union, etc.) carry out awareness-raising activities for the general public and health professionals. In the event that a counterfeit product is identified by any of these organizations, the Turkish Drug and Medical Equipment Institution shall be notified. An examination shall be made on the matter and its results are conveyed to the applicants.

Question 9. (mandatory)

Which legislative provisions, strategies, plans and preventive measures have been taken to prevent the promotion, advertisement and dissemination of material, including virtual information and medicinal product offers, when they are contrary to internal laws, during a pandemic and generally (Article 8. a, and 18. 3. b)?

Answer

In Turkiye, the sale, advertisement and promotion of medicinal drugs and equipment are governed by legal provisions. Pursuant to Article 24 of the Law on Pharmacists and Pharmacies (no. 6197), internet sites cannot be opened on behalf of pharmacists serving at pharmacies while the sale and advertisement of drugs cannot be made on the internet site or through other electronic means. According to Article 41 of the same law, persons who keep expired or medicinal drugs, drugs without a package or mixed preparations, shall be fined.

It has been clearly stated in Article 1 of the Law on Pharmacies and Medicinal Drugs (no. 1262) that medicinal drugs can only be sold at pharmacies and pharmaceutical stores.

Article 18 of the said Law provides that in case it has been established that the substances produced by pharmacists are adulterated, incompatible with the prescribed formula or rendered ineffective, they shall be imposed a fine. In case the promotion and sale is made online, access shall be immediately blocked to the relevant website. A fine shall also be imposed in the event of unauthorized promotion and sale of health products or contrary to the permission obtained. Fines shall be doubled upon recurrence of the acts. In Article 19 of the same law, a prison term is envisaged for those who produce and sell medicinal drugs without a licence.

Further relevant provisions are contained in Article 17 of the Law on Product Safety and Technical Provisions (no. 7223), Article 11 of the Law on the Establishment and Broadcasting Services of Radios and Televisions (no. 6112) and Article 61 of the Law on the Protection of Consumers (no. 6502).

Victims

This section aims at identifying measures focused on the protection of victims' rights.

Question 10. **(mandatory)**

Is there any national law and policy for the protection of victims of crimes arising from the counterfeiting of medical products and similar crimes, specifically during times of a pandemic due to the increased risks arising? If yes, please specify it. If not, what steps are being planned, if any, for the setting of such policy or in the absence of which, for victims of crime relating to counterfeit medical products generally (Article 19)?

Answer

In general, provisions exist against counterfeit medical products in the Penal Code, particularly in Articles 186 and 187. Moreover, as laid down in the Law no. 7223, in case persons have suffered damages due to non-conformity of medical devices with the standards, compensation arising from product liability, which has been detailed under the law.

Despite the fact that no national law is in force for the protection of victims of crimes arising from the counterfeiting of medical products, the Presidential Decree no. 63 has been put in force on 10.06.2020 in order to support victims of crime in general, based on which the Regulation on Judicial Assistance and Victim Services was promulgated on 30.04.2021.

Question 11. **(optional)**

Are measures provided to protect the rights of victims at all stages of the criminal proceedings, in a manner consistent with the procedural rules of internal laws (Article 20. 1 to 4)?

Answer

In the event of contradiction with the applicable provisions, sanctions are imposed by judicial and administrative authorities in accordance with the legal provisions.

Question 12. **(optional)**

What measures are provided to permit victim support and advocacy groups, NGOs and other groups to assist and support victims, with their consent, during criminal proceeding and outside of proceedings concerning offences related to counterfeiting of medical products and similar crimes involving a threat to public health? Please provide information on any such organisations and groups/bodies. Please provide information on any assessment of the effectiveness of such involvement by such providers (Article 20.5).

Question 13. (optional)

Is civil society actively engaged in providing supportive facilities for redress and recovery of victims of counterfeit medical products and similar crimes involving threats to public health (Article 19. b)? If so, please provide details.

Question 14. (optional)

What measures are in place or planned to enable victims to report offences impacting them and to receive protection and assistance in respect of offences established in accordance with this Convention? Is there any oversight to assess the effectiveness of such measures? If so, please briefly describe the results (Article 22.1).

Answer

All complaints and applications submitted by consumers to the Ministry of Health through the Presidential Communications Center (*CİMER*), Ministry of Health Communications Center (*SABİM*) and the official accounts of the Ministry (public relations and social media accounts) are recorded and the applicants are informed on their complaints within the framework of the relevant provisions.

Cooperation and information exchange

This section focuses on the ability and extent to which authorities/bodies may cooperate between them and exchange information in order to facilitate effective investigation.

Question 15. (mandatory)

Please provide information on measures that your country has taken or plans to take to adopt a national strategy and/or formal action plan on cooperation and information exchange between authorities/bodies to combat counterfeiting of medical products and similar crimes and whether they specifically make provision for pandemic situations (Article 17.1).

Answer

With a view to combating counterfeit medical products and similar offenses, the Ministry of Health maintains cooperation with both national and international authorities/bodies. Within the scope of the Rapid Alert System, maintained in cooperation with international organizations such as PIC/S, WHO, EDQM, WGEO etc., alerts received from the relevant authorities are processed and fulfilled. Moreover, regarding alerts received from the "Drug Alert System" of the World Health Organization, the required actions are taken in accordance with the procedures. Information is exchanged with all authorities.

Furthermore, with the PANGEA operation organized by the INTERPOL, internet sites which perform illegal sales of counterfeit medicine are targeted. Other stakeholders coordinating the operation are World Customs Organization (WCO), Permanent Forum on International

Pharmaceutical Crime (PFIPC), Heads of Medicines Agencies – Working Group of Enforcement Officers (HMA WGEO), pharmaceutical industry and electronic payment sectors. All institutions and organizations partake in the operation in coordination.

Cooperation is ensured with the competent authorities of the EU through the working groups and communication channels established by the European Commission for combating counterfeiting in medical devices and similar crimes. Information is exchanged with all authorities.

Question 16. **(optional)**

a. Is the implementation of such national strategy and/or action plan supported and underpinned by enabling legislation for the transfer and receipt of information and data between authorities/bodies and to and from other jurisdictions (Articles 17.1, 17.3, 21.1, and 21.2)?
b. Are there specific Memorandum of Understanding (MOU) and/or Data Sharing Agreements (DSA) between bodies, at national and international levels, to give effect to arrangements between authorities/bodies in combating counterfeit medical products and similar crimes. Have they been adopted specifically because of the COVID-19 pandemic?
c. Please describe briefly, and without going into detail, the practical measures that ensure the implementation and effectiveness of the MOUs and DSAs, including periodic reviews.

Answer

The necessary exchange of information and documents is realized regarding the issues falling within the purview of the relevant institutions and organizations as well as judicial authorities, under the Law on Pharmacies and Medicinal Drugs (no. 1262) and Law on Pharmacists and Pharmacies (no. 6197). Moreover, information is exchanged with the EU Commission and competent authorities under the applicable Regulation on Medical Devices.

Question 17. **(optional)**

Please state on cooperation arrangements which authority has the lead and which participate in the operation of the plans and what oversight exists on the operation of the plans. Please describe briefly, without going into detail, the main areas of responsibility of the participating authorities.

Question 18. **(optional)**

Do any arrangements involve cooperation arrangements with civil society, with industry or service providers (such as financial and money transfer services, e-commerce, social media platforms providers, logistics – including postal and delivery services, etc.)? If so, please briefly describe these arrangements and whether they took place during or as a result of a pandemic.

Answer

As regards products sold on the internet, works are carried out jointly with the Union of Internet Service Providers under the Law on the Regulation of Content on the Internet and Combating Crime Committed via Such Content (no. 5651) and the Laws no. 1262 and 7223, both cited

above. Moreover, in cooperation with social media platforms such as Facebook and Instagram, steps are taken for the removal of medical products which are contrary to law.

Question 19. **(optional)**

Please provide details on the membership or arrangements with bodies/groups dedicated to combating counterfeit medical products and similar crimes, whether investigative or advisory in nature. In your reply, please differentiate bodies/groups that put an emphasis on counterfeit medical products but are not solely dedicated to combating counterfeit medical products and similar crimes involving threats to public health.

Answer

The Oversight Services Directorate of the Turkish Medicines and Medical Devices Agency has been tasked with realizing works and actions concerning counterfeit medical products as per Article 508 of the Presidential Decree and Article 9 of the Regulation on the Duties and Work Principles and Procedures of Institutions and Service Units Affiliated to the Ministry of Health.

As per the Regulation on Health Oversight Officers of the Turkish Medicines and Medical Devices Agency, while on duty, Health Oversight Officers are under the obligation to collect evidence such as samples, documents, photographs and videos. They shall open and examine all substances and materials, seize them or have them seized if these raise suspicion of a violation.

Product oversight officers serving within the scope of the Regulation on Product Oversight Officers of the Turkish Medicines and Medical Devices Agency are empowered to carry out oversight, examination, count and investigation in all places in which the products are produced, stored, distributed, sold or used, including fixed or mobile places, and seal off these places where necessary.

Question 20. **(optional)**

Does the national strategy/action plan on counterfeit medical products stipulate or facilitate the establishment of a point of contact for receiving and sending alerts on suspect or confirmed counterfeit medical products between authorities? Is there any oversight of the effectiveness of this process? Please provide information on the effectiveness of this process.

Answer

The authorities maintain cooperation domestically and with authorities and organizations abroad to combat counterfeiting in medical products and similar crimes. Within the scope of the Rapid Alert System, maintained in cooperation with international organizations such as PIC/S, WHO, EDQM, WGEO etc., alerts received from the relevant authorities are processed and fulfilled. Moreover, regarding alerts received from the “Drug Alert System” of the World Health Organization, the required actions are taken in accordance with the procedures. Information is exchanged with all authorities.

Cooperation is ensured with the competent authorities of the EU through the working groups and communication channels established by the European Commission for combating counterfeiting in medical devices and similar crimes. Information is exchanged with all authorities.

Question 21. **(optional)**

Is there a point of contact specified for the international exchange of information relating to the counterfeiting of medical product, such as product alerts and analytical reports from laboratory investigations, that has different arrangements from other points of contact? Please provide any rationale for this difference.

Answer

Although not specific to this point, within the scope of the Rapid Alert System, maintained in cooperation with international organizations such as PIC/S, WHO, EDQM, WGEO etc., alerts received from the relevant authorities are processed and fulfilled. Moreover, regarding alerts received from the “Drug Alert System” of the World Health Organization, the required actions are taken in accordance with the procedures. Information is exchanged with all authorities.

Cooperation is ensured with the competent authorities of the EU through the working groups and communication channels established by the European Commission for combating counterfeiting in medical devices and similar crimes. Information is exchanged with all authorities. Among the alerts communicated to the Ministry of Health are those relating to quality faults in addition to counterfeit products, in accordance with which the necessary steps are taken.

Question 22. **(mandatory)**

Is the exchange of information or transfer and receipt of data and evidence between bodies/countries supported and underpinned by enabling legislation?

Answer

Judicial cooperation to be realized with other States is specified in detail under the Law on Judicial Cooperation on criminal Matters (no. 6706).

With a view to maintaining international exchange of information, the Ministry of Health is in contact with various stakeholders such as WHO, EMA, WGEO and PICs. Contact and sharing of information is constantly maintained through participation in both online and face-to-face meetings. Moreover, guidelines and SOPs are available on this issue.

Exchange of information with national and international institutions and organizations is carried out through official correspondence. Moreover, alerts from the rapid alert system are shared with contact persons over the official e-mail address of the Ministry of Health. This is among the procedures the Ministry is in charge of following under PIC/S membership.

Exchange of information with the EU Commission and competent authorities, transfer and receipt of data and evidence are governed by the relevant provisions of the Regulation on

Medical Devices. The medical device legislation applicable nationwide is completely compatible with EU legislation.

Detection

This section seeks to understand and appreciate the various measures that may be proactively taken during a pandemic to detect counterfeit medical products and to prevent them from reaching patients.

Question 23. (mandatory)

Are there legislative or other measures to ensure that industry can promptly report suspicions or detections of counterfeit medical products and similar crimes involving threats to public health, to any particular authority? Are there established or ad hoc procedures and processes for this reporting?

Answer

In Türkiye, the industry is under the obligation to report counterfeit medical products to the authority. These reports are made in conformity with the provisions of the Law no. 1262, the Regulation on the Production of Medicinal Products for Human Use and the Guidelines on Counterfeit, Smuggled Medicine or Medicine Taken out of the Context of Legal Supply Chain. As per the said legal arrangements, the Ministry communicates findings which form a threat to public health to judicial authorities.

As regards medical devices, the mechanisms to be established for reporting have been defined in the relevant legislation. In this context, reports received from the industry, users, patients etc. through the SABİM, CİMER and Product Tracking System (ÜTS) are collected stored in the register. In addition, the industry has the obligation to report unfit products to the Ministry under the Law no. 7223.

Reports containing suspected smuggling crime can be made by calling" ALO 136" Customs Enforcement Smuggling Reporting Line free of charge or by using the Online Report Page. For all kinds of smuggling reports in the air, on land or at sea, the ALO 136 hotline can be called free of charge for 24/7 from across the country.

Question 24. (mandatory)

Is there a market sampling programme established to detect counterfeit medical products on the market? If so, which authority is responsible for this? Is this system sustainable in times of pandemic having regard to the additional demands placed on analytical laboratories and testing services by the impact of the pandemic? Are there oversight arrangements to ascertain the effectiveness of these measures?

Answer

The Turkish Medicines and Medical Devices Agency carries out a risk-based medical market control program on medical products and annual market monitoring and oversight programs on medical devices. During these activities samples are taken from the market, which are examined. As need arises, the samples are sent for further analysis.

In case following the examination and analyses counterfeit medical products are found on the market, the necessary sanctions are imposed.

Anti-counterfeiting operations are carried out by the security forces. If need be, these authorities request staff, information and documents from the Ministry of Health.

Question 25. (mandatory)

Do these sampling programmes, mentioned in question 24 above, cover public procurement of medical products to detect counterfeit medical products being used in the public health system, such as in hospitals, and not procured for supply by sale to the trade or public? If not, are there arrangements to introduce such a programme?

Answer

In Türkiye, public and private hospitals finalize procurement procedures for medicine and medical devices following verification from the İTS and ÜTS systems.

Within the framework of the Medical Device Alert System and pharmacovigilance activities maintained by the Turkish Medicines and Medical Devices Agency, in the event of a report concerning products used in medical institutions including hospitals, samples are taken and sent to analysis where necessary. Sanctions are imposed on medical products found to be unfit as a result of the examinations and analyses conducted.

Question 26. (mandatory)

Are there laws and policies in place to enable customs services to detect, detain and act on a counterfeit medical product, as defined in Article 4.j, different to the intellectual property counterfeiting? Do the laws and policies enable customs services to take action without reference to a rights holder notwithstanding that the same medical product may also infringe an intellectual property right?

Answer

The prescribed actions are taken concerning counterfeit medical products under the Laws no. 1262, the Anti-Smuggling Law (no. 5607) and the Penal Code.

Ministry of Trade's Directorate General of Customs Enforcement, exclusively at the customs area and zone, is charged to prevent, monitor and investigate smuggling by means of cooperating with relevant organizations in the Customs Territory of the Republic of Türkiye, as needed.

Since the illegal trade of counterfeit medical product is defined as a smuggling crime in our country, when there is a suspicion that such a crime has been committed, first of all, an investigation is carried out in accordance with the provisions of the Criminal Procedure Law No.5271. If it is determined that the crime is fixed during the prosecution phase, criminal sanctions are applied within the scope of the Anti-Smuggling Law No. 5607.

Article 57 of Turkish Customs Law No.4458 and Articles 100 to 111 of Customs Regulation, covers border protection of IPR. A valid request from a right holder is enough for customs authorities to suspend the release of goods that may infringe IPR. Apart from that, the Customs have ex officio authority to suspend the release of suspicious goods even if there is no application for action of the right holder. There is no different customs legislation solely applicable to border protection of counterfeit medicines.

Investigation and Prosecution

This section concerns the ability to investigate and prosecute offenders for intentional crimes related to counterfeit medical products and similar crimes, in particular during a pandemic.

Question 27. **(mandatory)**

Please outline through the following measures how is the criminalisation of offences achieved in order to enable effective investigation and prosecution.

a. To what extent does the notion of 'medical products' in internal law fully corresponds to the definition in Article 4.a, even if the term is not specifically defined?
b. To what extent does the notion of 'counterfeiting' in internal law fully corresponds with the definition by Article 4.j as regards medical products? What steps have been taken to ensure that this has been or will be achieved?
c. Please outline what steps have been taken to ensure that offences relating to counterfeit medical products, as defined in Articles 4.a and 4.j, are criminalised in accordance with Articles 5 and 6.
d. Please outline what steps have been taken to ensure that intentional offences described in Article 8 relating to medical products, as defined in Article 4.a, are criminalised.
e. Please outline what steps have been taken to ensure that intentional offences described in Article 7 relating to documents, as defined in Article 4.h, are criminalised when performed in relation to medical products.
f. What steps have been taken to proactively bring to the attention of manufacturers and suppliers of medical products the consequences of actions/inactions by legal persons in relation to their business activities relating to medical products (Art. 11)?

Answer

a. Although the term 'medical products' has not been specifically defined within the legal framework, "pharmaceutical and medical substance" (Article 1 of the Law no. 1262), "medical product for human use" (Article 4 of the Regulation on the Licensing of Medical Products for Use in Humans) and "medical device" (Article 3 of the Regulation on Medical Devices) have been defined in law.

b. The notion of ‘counterfeiting’ has not been defined in the Penal Code. As a matter of fact, laws are not enacted to define notions but to impose rules. If the enforcement of the rules imposed would necessitate the specific definition of certain concepts, laws may contain such definitions. Judicial authorities are in a position to assess and determine the definition, meaning and extent of concepts which are not specifically defined in law, peculiar to the case in question, taking into account the definitions made by the Turkish Language Institution and current use in real life, using legal interpretation. The definition of ‘counterfeiting’ in Article 4.j can also be regarded as such. It is arguably compatible with forgery/falsification in our criminal law. However, whether ‘counterfeiting’ has been committed shall be assessed by judicial authorities on a case by case basis.

   Counterfeiting has also been defined in Article 8 of the Regulation on Production Plants of Medical Products for Human Use and Article 4 of the Regulation on the Labelling, Manuals and Monitoring of Medical Products for Human Use.

   In the Medical Devices Regulation, counterfeit device is defined as a device whose identification, origin, CE certificate label or relevant documents have been falsified, excluding copyright violations and inadvertent irregularities.

c. Currently, such legal proceedings are conducted under the Turkish Penal Code.

d. Intentional offences described in Article 8 relating to medical products are criminalised under Article 5 of the Regulation on the Licensing of Medical Products for Use in Humans and Article 19 of the Law no. 1262.

f. The recall procedure can both be initiated upon a report of a fault or other circumstance to the Ministry of Health by the licence holder/manufacturer and also by the Ministry, through a finding of unfitness for use by registered laboratories. Recalls can be approved as a result of a circumstance identified during checks by inspectors of the Ministry of Health. In addition, the Ministry can order a recall upon a finding of a circumstance compromising the safety of the consumer or contrary to the law, by the relevant commissions, or upon a recall decision by international institutions or organizations.

   Recall procedures are carried out in accordance with the Recall Regulation of 19 November 2015.
   Recall procedures are also contained in the Law on Product Safety and Technical Provisions (no. 7223).

   According to the Article 63 and 77/12 of the Law No. 6502 on Consumer Production and Regulation on Commercial Advertising and Unfair Commercial Practices;

   In order to protect the economic interest of consumers the Board of Advertisement imposed with an administrative fine of 13.2 million TL to companies that acted in a way that disrupted the market conditions regarding surgical masks, 3M Mask types, disinfectants, surgical gloves products in 2020.

Furthermore, the number of cases decided on is 68 by the Board of Advertisement in 2021 about medical products. Among these decisions;
41 cases for masks were suspended and 2 cases were imposed with an administrative fine of 209.562 TL and suspension simultaneously,
11 cases for disinfectants were suspended and 2 cases were imposed with an administrative fine of 209.107 TL and suspension simultaneously,
3 cases for PCR were suspended and 7 cases were imposed with an administrative fine of 762.212 TL and suspension simultaneously,
1 case for medical device were suspended and 1 case were imposed with an administrative fine of 114.326 TL and suspension simultaneously.

Additionally, the issue has been addressed in the

- Article 56 of the Constitution entitled “Health Services and Conservation of the Environment”;

- Articles 186, 187, 193, 194, 205-208, 210 and 212 of the Penal Code,

- Articles 3 and 4 of the Anti-Smuggling Law,

- Articles 18-20 of the Law on Pharmacies and Medicinal Drugs

Question 28. Framework for investigation and prosecution **(mandatory)**

Please provide information, specifically in relation to counterfeit medical products and similar crimes involving threats to public health, on:

a. any national specialised investigation units dedicated to:
    1) conducting criminal investigations, and/or
    2) coordinating and/or supervising criminal investigations by other units/authorities (Article 16), including inter-agency formal or informal committee or structure;
b. any specialised prosecutors and whether they function on a national or local basis.

If neither a or b apply, please describe briefly the framework used for specialised investigations and prosecutions to ensure that the full understanding of the crimes involved are taken into consideration.

Answer

a. The examination and investigation of such products are realized by the specialists and qualified inspectors and oversight officers of the Turkish Medicines and Medical Devices Agency. If need arises, the Ministry of Health provides coordination with the relevant bodies such as the Police and Customs.
b. The prosecution procedure is within the duties and responsibilities of the judicial authorities.

Question 29. **(mandatory)**

In relation to the investigation of counterfeit medical products and similar crimes involving a threat to public health, please indicate, without entering into detail:

a. the process in place, or planned, for deciding which investigation unit/body takes responsibility/the lead for investigations in general or as they occur;
b. if there are any different processes or arrangements in place to coordinate crimes related to a pandemic (Article 16.2, 17.1 and 3. b).

Answer

a. According to Article 9 of the of the Regulation on the Duties and Work Principles and Procedures of Institutions and Service Units Affiliated to the Ministry of Health, actions and procedures regarding counterfeit and smuggled medicinal drugs and products are among the duties of the Oversight Services Directorate of the Turkish Medicines and Medical Devices Agency. If deemed necessary, inspectors of the Ministry of Health can also conduct examinations/investigations.

   On the other side, information such as tip-offs and complaints are submitted without delay to public prosecutor's offices under the Code of Criminal Procedure (CCP, Law no. 5271) and an investigation is initiated in accordance with the instructions received from the public prosecutor by security forces.

b. In cases compromising public health such as pandemics, the relevant units of the Ministry of Health and the Ministry of Interior are in charge.

Question 30. **(optional)**

Please provide details of any dedicated facility available for the public to report information to investigating authorities (this does not relate to pharmacovigilance or product quality defect reports). Please provide details of whether the reporting is done by telephone, email, via an online platform, or other means, and whether this is a confidential report system. Is the reporting system reviewed for effectiveness? Please provide your assessment of the effectiveness of such facility.

Answer

Complaints concerning counterfeit medicinal drugs and devices and similar crimes are received by the Presidential Communications Center (*CİMER*), Ministry of Health Communications Center (*SABİM*) and the official accounts of the Ministry of Health. Applicants are informed on their complaints within the framework of the relevant provisions.

On the request of the applicant, personal information can remain confidential in applications made through the CİMER and SABİM systems.

These systems are managed by units affiliated to the Presidential Office and Ministry of Health and the responses given and applications are checked in this context.

The registry systems for medicine and medical devices also have mobile applications through which people are able to check all such products purchased. A dedicated tipoff button exists in the ÜTS application as well.

Question 31. **(mandatory)**

Are complaints on counterfeit medical products and similar crimes collated on a national basis for record keeping, analysis, and effective investigation or dealt with on an ad hoc basis by individual investigating authorities/bodies?

Answer

Complaints concerning counterfeit medicinal products and devices and similar crimes are received by the Presidential Communications Center (*CİMER*), Ministry of Health Communications Center (*SABİM*) and the official accounts of the Ministry of Health. Applicants are informed on their complaints within the framework of the relevant provisions.

As a result of applications, those which need to be examined and investigated are registered with file numbers and looked into. Progress can be followed with the file number.

These systems are managed by units affiliated to the Presidential Office and Ministry of Health and the responses given and applications are checked in this context.

Complaints on counterfeit medical products and similar crimes are collated on a national basis. The necessary analytic works are performed to ensure that investigations are carried out in a more effective manner. These records and analytic works can also be further taken into consideration by individual investigating authorities/bodies regarding these crimes.

Question 32. (mandatory)

Are all prescribed offences in Articles 5-8, and Article 9 investigated? Are they subject to a complaint being made and maintained (Article 15)?

Answer

The investigation of all crimes prescribed in Articles 5-8, and Article 9 of the MEDICRIME Convention is carried out pursuant to the CCP by the relevant units under the coordination of public prosecutor's offices. Under criminal law, the investigation of such crimes initiate upon receiving information that a crime has been committed and can be launched *ex-officio*, i.e. without a complaint having been filed.

On the other side, such offenses against public health are laid down in Articles 186 and 187 of the Penal Code as well as in the Articles 35 and 37 to 39; Article 41 of the Law on Pharmacists and Pharmacies (no. 6197), Articles 18 and 19 of the Law no. 1262 and the relevant provisions of the Anti-Smuggling Law (no. 5607) and the Law on Product Safety and Technical Provisions (no. 7223). These crimes are not subject to a complaint being made and maintained.

Question 33. (optional)

In relation to counterfeit medical products and similar crimes involving a threat to public health, is there an indicative list of offences, associated with Articles 5-9, 11 and 13 and other criminal laws, to facilitate investigators in deciding the legal basis and the evidence required for successful investigations, in particular during a pandemic when advisory experts and technical staff may not be immediately available (Article 16)?

Answer

Such offenses have been listed under Articles 18 and 19 of the Law no. 1262, Articles 186 and 187 of the Penal Code, Article 24 of the Law no. 6197 and Articles 16, 17, 18, 19 and 20 of the Law no. 7223. Upon a finding of falsification of documents, which carries a heavier penalty, a criminal complaint is filed with public prosecutors.

Question 34. (optional)

Please outline the national approach with regard to investigating bodies/authorities on counterfeit medical products and similar crimes, in a manner consistent with procedural rules of internal laws, on the extent of any discretion on whether to initiate and terminate an investigation without reference to a prosecuting authority or other investigating authorities for medical product counterfeiting?

Answer

According to Article 9 of the of the Regulation on the Duties and Work Principles and Procedures of Institutions and Service Units Affiliated to the Ministry of Health, actions and procedures regarding counterfeit and smuggled medicinal drugs and products are among the duties of the Oversight Services Directorate of the Turkish Medicines and Medical Devices Agency.

It has been laid down in Article 36 of the Presidential Decree no. 4 that the Turkish Medicines and Medical Devices Agency is empowered to oversee real and legal persons including public and private entities.

Health inspectors at the Agency are in charge of overseeing such activities, collect evidence on suspicion of illegal activities and alert public prosecutors where necessary.

Sanctions and aggravating circumstances

This section aims at identifying what specific legislative and other measures have been taken to support the sanctioning of persons in relation to the counterfeiting of medical products and similar crimes in final sentences, in particular relating offences committed in a pandemic.

Question 35. (mandatory)

Do internal laws permit the seizure, confiscation and disposal, including destruction, of medical products, active substances, accessories, parts and materials, and other instrumentalities used to commit the offences described in Articles 5-8? (Article 12. 2. a and b).

Answer

Although no additional legal arrangements have been made during the pandemic, applicable legal texts contain the necessary provisions. These are Article 2 of the Law no. 1262, Article 33 and 41 of the Law no. 6197, Article 17 of the Law on Pharmacies and Shops where Poisonous and Active Substances Used in Professional and Agricultural Works are Sold (no. 984), Article 10 of the Regulation on Production Plants of Medical Products for Human Use, and the relevant provisions of the Law no 7223, the Medical Devices Regulation and the Product Oversight Regulation of the Turkish Medicines and Medical Devices Agency.

The Penal Code contains provisions for the "confiscation of property" (Article 54) as well as confiscation of gains (Article 55). ("Securing and seizure of materials or gains" defined in Article 123 of the CCP.) On the other hand, Anti-Smuggling Law defines "Search and seizure" in Article 9; "Confiscation" in Article 13; "Liquidation" in Article 16.

The principles and procedure relating to the securing, seizure, transfer, disposal, return, confiscation and destruction of the object of crime and financial gain, are laid down in detail in the Regulation on the Object of Crime, promulgated on 23.03.2016.

Question 36. (optional)

Are there policies facilitating the prosecution of offences in Articles 5-9 along with other criminal law offences arising from the same set of facts on counterfeit medical products, such as intentional offering, for gain, of medical products to prevent or treat the pandemic disease and without the intention to supply such products, also referred to as scamming?

Question 37. (optional)

Is there a policy for offences in Articles 5-9, either generally or during a pandemic, to be subordinate to other criminal law offences in the case of a prosecution of the same person(s), such as the trafficking of controlled substances in the same consignment as the counterfeit medical products?

Question 38. (mandatory)

Is there a specific sanctioning policy relating to offences related to counterfeit medical products and similar crimes generally, with specific reference to Article 13 circumstances in so far as they do not already form part of the constituent elements of the offence, and if so, whether the fact that the offence occurred during a pandemic is considered as an aggravating circumstance?

Answer

There are no provisions in the criminal law system which prescribe the fact that the offence occurred during a pandemic is considered as an aggravating circumstance. The aggravating factors listed under Article 13 are also contained in our criminal law system. However, it is not possible to argue that these are apply separately for each type of offense. Each offense needs to be evaluated on an individual basis, taking into consideration the aggravating factors contained in the relevant specific law.

In the Penal Code, under Chapter II, Part 4, entitled “Jointly Committed Offences”, assistance to the commission of an offense has been laid down. Aggravating circumstances such as “causing the victim’s death or physical or mental injury” have been exclusively dealt with under separate articles. However, pandemic conditions have not been set as an aggravating circumstance in criminal law and other applicable laws, based on which administrative actions are carried out.

Question 39. **(optional)**

Please specify if and to what extent internal law provides for the possibility of removing the professional status of a person who abused the confidence placed in them in their capacity as a professional (Articles 12.2 and 13. b) or, including legal persons, as manufacturers and suppliers (Article13. c).

Answer

Circumstances which prevent keeping the professional status of a pharmacist are listed under Article 4 of the Law on Pharmacies and Pharmacists (no. 6197).

Moreover, the Ministry of Health may, under the relevant provisions of the Regulation on Production Plants of Medical Products for Human Use, suspend or remove the powers of production directors who are in charge.

As per Article 30 of the Regulation on the Sale, Advertising and Promotion of Medical Devices, a temporary or indefinite annulment of permission can be ruled with respect to sales centers which act contrary to the terms of the Regulation. In addition, under Article 28, the conditions according to which work permits of directors, sales, promotion and clinical assistance members can be suspended and revoked.

Data Collection

This section concerns the effective collection, collation and analysis of data that can support the fight against counterfeit medical products and similar crimes involving threats to public health in a pandemic, and in general.

Question 40. (optional)

Please indicate whether data is collected for the purpose of observing and evaluating the phenomenon of counterfeit medical products or for another purpose (Article 17.3.a and b). Please:

a. Specify if data is collected in the normal course of activity and for what purpose.
b. Indicate whether they were collected specifically during the COVID-19 pandemic. If not, can data for the period of the pandemic be separated from that collected in the normal course of activity?

c. Specify what mechanisms have been established for data collection.
d. Provide the relevant data collected, in particular that during the COVID-19 pandemic, and any reports from the analysis of this data.
e. Indicate if the data and relevant reports based on such data were shared with all the relevant authorities/bodies. Please list the authorities/bodies that compiled the data, produced the reports and those who received them.

Answer

b. During the pandemic, as the number of cases relating to products used in the treatment of the COVID-19 disease were on the rise, the Ministry of Health gave priority to actions in respect of the online sales of COVID-related products. In particular, prompt actions are being taken in response to reports received from national and international sources relating to COVID-19 so as to prevent threats to public health.

c. The Ministry of Health maintains cooperation with national and international authorities/bodies for combating counterfeiting in medical products and similar crimes. Within the scope of the Rapid Alert System, maintained in cooperation with international organizations such as PIC/S, WHO, EDQM, WGEO etc., alerts received from the relevant authorities are processed and fulfilled. Moreover, regarding alerts received from the "Drug Alert System" of the World Health Organization, the required actions are taken in accordance with the procedures. All complaints and applications submitted by consumers to the Ministry of Health through the Presidential Communications Center (*CİMER*), Ministry of Health Communications Center (*SABİM*) and the official accounts of the Ministry (public relations and social media accounts) are recorded and the applicants are informed on their complaints within the framework of the relevant provisions.

e. Alerts received from both national and international authorities/bodies such as PIC/S, WHO, EDQM, WGEO, INTERPOL (within PANGEA Operation) are promptly responded to. With a view to ensuring the protection of public health, following the conclusion of the essential examinations, the alerts are conveyed to the relevant Ministries (Ministry of Agriculture and Forestry, Ministry of Interior) and institutions/organizations (the Social Security Institution, General Directorate for Public Hospitals, General Directorate for Public Health, General Directorate for Security, etc) for initiating the necessary actions.