Importation and Delivery of Pharmaceuticals - Türkiye and Syria Earthquake Response

The process for storing and distributing pharmaceuticals inside of Türkiye is a highly regulated process. Under current regulations, only approved manufacturers, distributors, community pharmacies or health facilities can keep pharmaceuticals in stock, and in compliance with the national Department of Pharmaceuticals Goods Distribution Practices for Medical Products / Guideline İDD-KLVZ-02. While it is technically possible for humanitarian response organisations to become registered, it is an extremely complicated process and should be considered impossible under the current emergency context.

Humanitarian organizations wishing to procure and transport pharmaceuticals for response in either Syria or Türkiye are advised on the following.

If pharmaceuticals are purchased in Türkiye:
- Pharmaceuticals purchased in Türkiye can easily be stored and transported by the supplying company. Humanitarian organisations can contract the supplier for delivery all the way to the Syrian border, or even for delivery inside of Syria in some cases.
- If the contracted supplier is not arranging transportation, only AFAD or the Turkish Red Crescent may facilitate transportation on behalf of the humanitarian organisation to Syria.

If pharmaceuticals are purchased outside of Türkiye:
- Pharmaceuticals can be imported for later re-export and use in Syria. However, pharmaceuticals imported for later intended use in Syria:
  - Cannot be managed directly by the humanitarian response organisation; The Turkish Red Crescent will manage all onward distribution and delivery.
  - All pharmaceuticals imported into Türkiye must fully comply with Turkish import procedures and the Turkish approved medicines list.
- Pharmaceuticals can be brought into Türkiye and transported to Syria without full customs clearance by using bonded storage and transport. However, organizations using bonded transport and storage for delivery to Syria:
  - Must be fully legally registered in Türkiye, even if the cargo is considered pre-cleared.
  - (If not fully legally registered in Türkiye) can only consign to another agency that is already registered and is willing to act as consignee for the cargo.
  - Are strongly advised to ensure that bonded storage conditions meet minimum WHO good distribution practices for pharmaceutical products.
  - Can discharge bonded cargo at the Syrian border. Contracted transporters may also be able to deliver to final location in Syria, depending on conditions and contractual arrangements.
- Pharmaceuticals imported for intended use inside of Türkiye can only be consigned to and handed over to AFAD. Humanitarian organisations intending to deliver medicines to Türkiye for use in Türkiye should consult with AFAD in advance.

For all importation of pharmaceuticals into Syria:
- Pharmaceuticals imported into Syria must comply with the pre-approved essential medicines list (updated 2019).
- Full customs clearance into Syria must be followed at all times.
- Pharmaceuticals must have a minimum of 12 months shelf life, advisably more whenever available.
For importation of controlled medicines into Northwest Syria:

- **If controlled medicines are procured in Türkiye:**
  Turkish authorities conduct due diligence for the organizations requesting procurement and delivery of these supplies. Those who receive clearance on this can apply for procurement of these supplies to be exported to Syria. The export permit request will be proceeded by the supplier for each shipment. For due diligence, organizations are encouraged to contact MoH Türkiye Syria Task Forces in Hatay, Gaziantep or Kilis Health Directorates.

- **If controlled medicines are procured outside of Türkiye:**
  Organizations are required to send a Shipment Request/Notification Form for Emergency Supplies of Controlled Substances to TC Ministry of Health Pharmacovigilance and Controlled Substances by an official letter or an email to aysegul.celikkanat@titck.gov.tr; demet.aydink@titck.gov.tr in accordance with instructions provided in the Model Guidelines for the Provision of Controlled Medicines for Emergency Medical Care. Prior to submitting, activities should be coordinated with AFAD.

All humanitarian organisations planning on importing pharmaceuticals into Syria should notify the Syria Health cluster. Please contact the following parties for more information:

- Orwa Abdullah, alo@who.int
- Zinah Noorduldeen, nooruldeenz@who.int