

## TURKEY REACH (KKDIK) REGULATION REQUIREMENTS

As a result of Turkey's status as a candidate country for the European Union and in order to ensure control over chemicals within the country, the EU REACH Legislation has been harmonized with the conditions of the Turkish Industry. In this context, on June 23, 2017, the Regulation numbered 30105 titled "Registration, Evaluation, Authorization, and Restriction of Chemicals (KKDIK)" was published by the Ministry of Environment, Urbanization, and Climate Change of the Republic of Turkey. The KKDIK Regulation came into effect six months after its publication, on December 23, 2017.

The KKDIK Regulation encompasses provisions for Registration, Restriction, and Authorization of chemical substances. According to the KKDIK Regulation, it is mandatory for chemical substances to be registered through the Chemical Registration System (KKS) of the Ministry of Environment, Urbanization, and Climate Change. All chemical substances falling within the scope of KKDIK and not exempt from registration, whether in their pure form, in mixtures, or in articles intended to release them, are required to be registered if they are produced or imported in quantities of 1 ton or more annually in Turkey. The obligation to register substances is valid regardless of whether the substances meet classification criteria according to Regulation SEA No. 28848.

The Chemical Substance Registration process under KKDIK consists of two stages: Pre-registration and Registration. Pre-registration provisions commenced on December 23, 2017, and will continue until the deadline specified in the procedures and principles to be published by the Ministry. After the completion of the initial 3-year period provided for pre-registration, the registration process for chemicals began.

With the regulation titled "Regulation on Amendment to the Regulation on the Registration, Evaluation, Authorization, and Restriction of Chemicals," numbered 32408, published on December 23, 2023, the final registration deadlines were postponed, and some changes were made. Accordingly, the updated final registration deadlines have been arranged as 31/12/2026, 31/12/2028, and 31/12/2030, depending on the tonnage and classifications of the substances. For details on the new final registration deadlines, you can refer to our article titled "KKDIK Registration Dates are Being Updated."

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The Restriction provisions under the KKDIK Regulation are included in Annex-17 of the Regulation. Annex-17 came into effect as of December 23, 2017. Restrictions impose limitations on the use and concentration of substances.

Manufacturers, importers, and downstream users are responsible for ensuring that substances are manufactured and used without harming human health and the environment. In this regard, the responsibility for carrying out the processes mentioned within the scope of the KKDIK Regulation lies with the manufacturer, importer, downstream user, or sole representative. The management of the processes related to the Registration, Evaluation, Authorization, and Restriction of substances is the responsibility of the Ministry of Environment, Urbanization, and Climate Change.

**Regulations Repealed by KKDIK (Turkey REACH) and their Repeal Dates:**

- Regulation on Inventory and Control of Chemicals numbered 27092: Repealed upon the publication of the KKDIK Regulation.
- Regulation on Safety Data Sheets for Hazardous Substances and Mixtures numbered 29204: Repealed as of December 31, 2023.
- Regulation on Restriction and Prohibition of Hazardous Substances and Mixtures numbered 27092: Repealed upon the enforcement of the KKDIK Regulation.