

WHAT IS KKDIK?

KKDIK (aka Turkey REACH) came into force on 23 June 2017 and has replaced three existing regulations on chemicals and mixtures with the purpose of regulating the chemical inventory, enforcing secure usage, and risk management on hazardous substances, and promoting alternatives to hazardous substances or procedures. The provisions of KKDIK are very similar to EU REACH.

The KKDIK registration period started on 1st January 2021. Exporters who wish to enter into Turkish market but missed the pre-registration deadline can still pre-register. They should do so as soon as possible to be able to benefit from the advantages of joint registration and to participate in the KKDIK Substance Information Exchange Forum (SIEF).

Unlike under EU REACH, the registration deadlines are not affected by the tonnage bands under KKDIK.

The deadline for final registration under KKDIK is 31st December 2023.

We have already set up an Only Representative (OR) facility in Turkey, 'GPC Turkey', to assist our existing and new clients in complying with their obligations under KKDIK!



WHO IS CONCERNED?

- ◆ **Turkey-based manufacturers and importers of chemical substances**
Importers and manufacturers must register chemical substances before placing them on the market.
- ◆ **Non-Turkey-based manufacturers who wish to export chemical substances to Turkey**
Exporters may appoint a Turkey-based OR to carry out the pre-registration/registration

WHAT IS THE PURPOSE OF KKDIK?

- ◆ To regulate the administrative and technical procedures and principles regarding the registration, evaluation, authorisation and restriction of chemical substances.
- ◆ To ensure a high level of protection of human health and the environment.
- ◆ To promote the use of alternative methods for the assessment of hazard substances while enhancing competitiveness.

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Which documents do I need to submit for registration purpose?

Documents	1 – 10 t/y	10-100 t/y	100-1000 t/y	1000+ t/y
Technical dossier including main information as registrant's identification, Substance ID, guidance on safe use, classification and labelling	✓	✓	✓	✓
Exposure assessment	✓			
Exposure scenario		✓	✓	✓
Chemical Safety Report and Chemical Safety Assessment		✓	✓	✓
Safety Data Sheet (if the substance is under harmful criteria)	✓	✓	✓	✓
Physiochemical Properties	✓	✓	✓	✓
Toxicological information	✓*	✓	✓	✓
Ecotoxicological information	✓*	✓	✓	✓

*If the substance is hazardous

Q&As – KKDIK

1. What are the obligations of non-Turkish companies under KKDIK?

Non-Turkish companies that are exporting substances to Turkey are not obliged to register unless they appoint an OR to accomplish the obligations of importers.

2. What is the role of an OR?

An OR is a natural person or legal entity established physically in Turkey, equipped with sufficient knowledge in the practical handling of the substances and information related to them. ORs are appointed by a mutual agreement with a manufacturer, formulator or article producer, established outside Turkey. They are responsible for complying with the legal requirements for importers under KKDIK.

3. Is KKDIK applicable to substances with manufactured/imported tonnage below 1 ton per year?

Under KKDIK registrants have obligations regardless of tonnage. These include restriction, authorization and communication within the supply chain (such as the provision of Safety Data Sheet.) The one ton and above per year threshold applies to registration only.

ACTION POINTS

1. Compile a list of substances that you would like to place on the Turkish market and submit the list to your OR.
2. Get in touch with a Turkey-based OR facility, such as **GPC Turkey**.
3. **GPC Turkey** will assist you in carrying out KKDIK pre-registration/registration as well as CLP notification.
4. Keep in mind that substances not registered after 31st December 2023 will be kept out of the Turkish market.
5. Keep yourself updated on KKDIK developments at www.gpcgateway.com