

## How to comply with Turkey REACH (KKDIK) registration: SIEFs, Consortia and Dossier Preparation

### Q&A

No.	Questions	Answers
1	Is it true, that if I want to export products below 1 t/a after 31.12.2023, I need a pre-registration before this date?	Substances below 1 tonne per annum are exempted from registration & pre-registration activities as per KKDIK Article 7.
2	In the SIEFs there will be a lot of companies that have pre-registered, but have no intention to register (for example because they are below 1 t/a). How does the Ministry know, which company to appoint as lead?	Currently we do not have the information on the criteria which the Ministry will use when appointing Lead Registrants for the "orphan" SIEFs. Further information will be communicated by the Ministry.
3	If our product is already registered in Turkey, do we still require the registration under KKDIK and I believe it is for chemical substances?	If the substance is registered by the responsible actor in the supply chain (e.g. Non-Turkish manufacturer via an Only Representative, Turkish manufacturer or Turkish importer), registration will not be necessary. It is important that a substance may be registered in another supply chain but each separate supply chain needs to have one registered actor.
4	If there is no chemical substance in our product, do we still need the registration?	Any substance on their own, in a mixture or in an article that is manufactured or placed in the Turkish market above 1 tonne per annum and does not qualify for the exemption criteria need to be registered under KKDIK unless they are already registered by another actor in the supply chain.
5	Is it possible to upload an EU dossier i6z format directly into the KKS portal? Is it possible to export dossiers from the KKS portal?	It is not possible to upload i6z file format directly to KKS, this process is manual, and all the information provided in the dossier has to be in Turkish unless it is an attachment of the spectral analysis report or full study report.
6	Is there any complete list of the chemicals exempted from registration, including Annexe 4&5 items (excluding medicines) available?	Substances with CAS and EC numbers are available on Annex 4 list. However, as Annex 5 only sets the criteria for exemption, it is not possible to gather a complete list of substances fitting the criteria. Thus, we recommend that you send us the list of your

		substances if you think you can benefit from exemption criteria, and we can offer you a free compliance analysis of your substances.
7	Can we still perform pre-registrations in 2023?	Late pre-registrations are still possible until the end of 2023.
8	Understand maybe I am wrong that for you, companies that are based in Europe if they have a REACH, automatically they get exempted for Turkey but that is not applicable to other EU-REACH registered, but NOT based in Europe is this correct??	Registrations of substances in any other region than Turkey are not valid under KKDİK, and the registrations shall be separately submitted in order to comply with KKDİK regulation if the substances are placed in the Turkish market.
9	Are natural items like castor oil, Neem oil, palm oil, that are exempted in EU REACH also exempted from registering in Turkey REACH??	Naturally occurring substances that are not chemically modified are generally exempted from registration obligation under KKDİK however there may be some exceptions such as enzymes. We recommend that you send us a list of your substances for a free compliance analysis.
10	In case of Polymers under EU-REACH, if individual monomers are registered the polymer gets registered. Does this rule is also followed in Turkey REACH?	Similar to EU REACH, monomers of polymers and any other substance that is more than 2w/w% of the substance & exceeding the 1 tonne per annum criteria should be registered instead of the polymer.
11	Where can we find these SIEF or Lead registrants?	SIEF members and Lead Registrant information is published strictly on KKS (chemical registration system) and is not available to the public. Only pre-registered parties can access the SIEF member details.
12	What are the registration fees?	You can access the official fees for registration and related activities on our website <a href="http://gpcgateway.com">http://gpcgateway.com</a>
13	The sign => is not clear	The "=>" symbol on the slide mentioning the obligation to provide chemical safety report (CSR) in the registration dossier implies a "if... then" logic operator as per mathematical notation of logic phrases.
14	Do you have an overview of the existing SIEFs?	Data regarding SIEFs are confidential and only available to necessary parties that are a part of relevant SIEFs.

15	Does REACH apply to only new substances (i.e. new chemical compounds which haven't been registered or don't appear on the registered list of substances, e.g. Silver. If my mixture has silver, which is already registered, do I need to register again?)	Turkey REACH, aka KKDIK, applies to all substances that are manufactured or placed in the Turkish market unless they are radioactive, in transit (only passing through Turkey), non-isolated intermediates, waste material or substances used in the defence industry regardless of whether they have been included in the Turkish inventory in the past or not.
16	Do we need to register antimicrobial products used in agro and water purification under KKDIK?	The volumes covering the uses of substances in biocidal products (as long as they are listed in the active ingredients list of relevant regulation), plant protection products and food & feedstuff are exempted from registration obligation.
17	How do we register products like rat repellents? Not biocidal products but repellent products.	If the substance is used in the scope of plant protection products (PPPs), the volume covering that usage is exempted from registration obligation.
18	How do we register plant nutrition products which are not fertilizers but provide nutrition to plants?	If the substance is used in the scope of plant protection products (PPPs), the volume covering that usage is exempted from registration obligation. If the substance does not meet the criteria for PPPs, then the substance needs to be registered.
19	Do we need to register polymer additives? Mixtures that are added to polymers to improve performance?	Only polymer stabilizers are exempted but any other additive substance for improving the performance need to be registered as long as they do not meet other criteria for exemption.
20	How do we register agro adjuvant products? Used on plants but not biocidal product.	If the substance is used in the scope of plant protection products (PPPs), the volume covering that usage is exempted from registration obligation. If the substance does not meet the criteria for PPPs then the substance needs to be registered.
21	If our volume doesn't reach 1 tonne, what do we do as importers? Since we don't qualify for registration. Is there any kind of compliance certification that we can do to ensure compliance with Turkish chemical regulation to give customers that assurance? E.g. something like SVHC testing. Or any other certification that would give better visibility of our products apart from REACH Registration?	Substances may still have other obligations even if they are exempted from registration. Communication of the SDS down the supply chain, permit application if required, and compliance for restrictions mentioned in Annex 17 are examples of duties for substances below 1 tonne per annum. A self-declaration or third-party audit via a consultancy company like GPC can provide assurance for the supply chain regarding the exemption from obligations.

22	<p>If the substances in our mixtures already appear on the registered list of substances, do we still need to register? Any specific cases where we would have to register, e.g. if we want to register our products which are mixtures do we need to register individual substances?</p>	<p>Every supply chain needs to register the substance by the responsible actor (manufacturer or importer) even if the substance is registered in another supply chain.</p>
23	<p>Request you to confirm whether we need to register new substances or registered substances also if the substance reaches the quantity of one tonne.</p>	<p>Every supply chain needs to register the substance by the responsible actor (manufacturer or importer) even if the substance is registered in another supply chain, unless it qualifies for the exemption from the registration obligation.</p>
24	<p>Anything once the registration deadline is passed?</p>	<p>Registration activities will continue after the deadline however it will not be possible to place substances in the Turkish market if the substance is not registered. In addition, the evaluation &amp; authorization process will begin once the registration phase is terminated.</p>
25	<p>How do we register in 2024?</p>	<p>Registration will be possible after the 2023 deadline although it will not be possible to place the substance in the Turkish market if the substance is not registered.</p>
26	<p>If we have customers in Turkey but don't fall under the registration guidance now. What would be the right way to go forward?</p>	<p>The initial obligation for registration falls on the local importer of the substance unless the non-Turkish manufacturer appoints an Only Representative (OR). Appointing an OR gives you full access to the Turkish market without being dependent on the Turkish importer.</p>
27	<p>We have pre-registered some of our products under Turkey REACH and the certificate validity is till Feb 2023. Would like to have these renewed if the registration period is longer or else complete the Registration. Need to know the prevailing Registration timelines &amp; data requirements - whether they are the same as EU REACH or whether the EU REACH registration can be used for directly registering under Turkey REACH considering EU has already registered these products.</p>	<p>The deadline for registration under KKDIK is the 31st of December 2023. After the deadline, it will not be possible to place substances in the Turkish market until they have a valid registration. We strongly suggest starting registration activities as soon as possible as access to the registration portal may be problematic towards the end of the deadline due to high traffic. Data requirements are similar to those for EU REACH and are available in our data requirements slide.</p>

28	Where can I find out for which products SIEFs or even more important lead registrants already exist?	SIEF details are confidential to the SIEF members and are not published publicly. Similarly, lead registrant information can only be displayed through the KKS portal which is only available to local actors or only representatives. You can submit your substance list to us, and we can offer you a free SIEF status report (without disclosing confidential information)
29	Can we do registration process of turkey REACH, if we didn't do pre-registration?	Registration is only possible after a pre-registration as the pre-registration allows the actors to be a member of the SIEF and part of a joint submission.
30	How much is the approximate expense of Turkey REACH (KKDIK)?	The cost for registration heavily depends on the number of joint registrants, tonnage band, and the nature of the substance as the testing requirements may vary. Thus, the only definitive costs that can be given are our service costs as well as the official fees depending on the tonnage band and the company's SME category.