

**KKDIK (Türkiye REACH)**

On 23.06.2017, KKDIK Regulation (Registration, Evaluation, Authorization and Restriction of Chemicals) was published in the Official Gazette numbered 30105 by Environment and Urbanization Ministry.

The companies which manufacture or import substances in Türkiye with an annual amount of 1 ton or more in its own or in the mixture have the “obligation of full registration” in the scope of the KKDIK Regulation. The companies that are not located in Türkiye have to work with Only Representatives(OR) to be involved directly KKDIK Regulation process. If a company outside of Türkiye registers, importers in Türkiye will not register.

All these processes must be carried out through the “Kimyasal Kayıt Sistemi-Chemical Registration System (KKS)” application within the “Entegre Çevre Bilgi Sistem- Integrated Environmental Information System (ECBS)”, which is the electronic portal created by the Ministry.

Annual manufacturing/import quantity ranges for registration are as follows:

≥1-10 tons / year

≥10-100 tons / year

≥100-1000 tons / year

≥1000 tons / year

The KKDIK regulation compliance process consists of two stages.

- 1) **Substance pre-registration:** Substances are registered with the KKS on behalf of your company. The purpose is to inform the Ministry that your company intends to full registration. Companies that pre-register join a group called the “Madde Bilgisi Değişim Forumu(MBDF)-Substance Information Exchange Forum (SIEF)”. Each substance has a MBDF. Within the MBDF, there will be one "Lead Registrant" company. It will first submit the registration file containing the substance's test data to the Ministry and will have a full registration number assigned to the KKDIK. Other companies within the MBDF will become "Joint Registrants." After the Lead Registrants registers, the Joint Registrants can register.

ChemRAS will be your company's consultant and/or Only representative.

Your costs at this stage:

- I. Only representative appointment fee (payment to ChemRAS)



- II. Substance pre-registration fee (payment to ChemRAS)
- III. Annual regulatory monitoring fee for the substance until full registration (payment to ChemRAS)
- IV. Hourly service fee, if necessary (e.g., additional research on the substance or creating a substance inventory for your company) (payment to ChemRAS)

2) **Substance full registration:** This is the final stage where KKDIK legal requirements are completed. This stage takes more time and costs more.

Your costs at this stage:

- I. Preparation of the substance registration dossier (payment to ChemRas. Cost unknown, but an estimate can be provided)
- II. Request for access to test data (payment made to the Lead Registrant or test owner. Cost unknown, varies for each substance)
- III. Registration fee (payment made to the Ministry of Environment. Cost depends on company size and substance registration tonnage range)
- IV. Hourly service fee, if necessary (for example, conducting additional research on the substance or contacting/obtaining information from the Lead Registrant)

Important dates in the KKDIK Regulation harmonization process:

• **31/10/2025: Deadline for Pre-Registrations**

This is the deadline for pre-registrations. For substances manufactured/imported for the first time after this date, pre-registrations must be made within 30 days of their market launch.

• **31/12/2025: Deadline for Determining the Lead Registrant for the Substance Information Exchange Forum (SIEF/MBDF)**

This is the deadline for determining the Lead Registrant within the Substance Information Exchange Forum (SIEF/MBDF). SIEF leaders for substances to be placed on the market for



the first time after August 12, 2025, are determined within the first six months of the substance's market launch.

• **31/03/2026: Deadline for Provisional Registration of the Lead Registrant Company**

This is the deadline for the Lead Registrant to submit a provisional registration with limited information about the substance in Annex-I, if they are unable to obtain the required information for a full registration.

• **30/09/2026: Deadline for Temporary Registration of Joint Registrant Companies**

This is the deadline for Joint Registrant companies to temporarily register themselves if the Lead Registrant company has made a temporary registration.

Deadlines for full registration

Registration deadline	Condition
31/12/2026	Substances manufactured or imported on their own, in mixtures or in articles in quantities of 1000 tons or more per year ,
	Substances manufactured or imported on their own, in mixtures or in articles in quantities of 100 tons or more per year and with Aquatic Acute 1 and/or Aquatic Chronic 1 (H400, H410) hazards
	Substances that are manufactured or imported on their own, in mixtures or in articles in quantities of 1 ton or more per year and are carcinogenic, mutagenic and/or toxic to reproduction Category 1A or 1B (H340, H350, H360)
31.12.2028	Substances manufactured or imported on their own, in mixtures or in articles in quantities of 100 tons or more per year
31.12.2030	Substances manufactured or imported on their own, in mixtures or in articles in quantities of 1 ton or more per year