

# Turkish REACH registrations to begin late next year

Entry into force foreseen for second quarter of 2015

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Registrations for the Turkish version of REACH – known in the country as KKDIK – are scheduled between 31 December 2015 and 31 December 2018, a draft of the regulation published by the Ministry of Environment (MoE) for public consultation shows.

The MoE is expecting comments from industry and governmental organisations on the draft until 31 October. It will then revise and publish the regulation, and possibly amend the enforcement date, says Ahu Çekim, environment and urban planning specialist at the Ministry's chemicals management department.

According to the current draft, there is no separation of deadlines, depending on the tonnage bands or the classification of the substances, like is the case in the EU, where REACH has three registration deadlines. In Turkey, manufacturers can register their substances at any time between the end of 2015 and the end of 2018, Melih Babayigit, general director of CRAD consultancy, tells *Chemical Watch*.

The Turkish Ministry of Environment, which is the competent authority for KKDIK, set a final registration deadline which is later than for the EU's REACH, scheduled for 31 May 2018. "Thus dossiers of all substances, even at the lowest thresholds, will be ready for submission before that date," says Mr Babayigit. He underlines, however, that substance information exchange fora (Siefs), established for EU REACH, will have to consider how to extend their arrangements for data also to be used for KKDIK registrations.

Companies exporting chemicals or articles containing certain chemicals to Turkey can appoint an only representative (OR), like in the EU, to submit the KKDIK registration on their behalf. The exporters' clients in Turkey will then have a downstream user status.

The MoE has inserted Annex XVIII to KKDIK, which mentions the criteria for training and certification of a risk assessor in Turkey, in an effort to increase local expertise on chemical risk assessment, Mr Babayigit says. He believes that even if data submitted for EU REACH will be used for KKDIK registrations, companies will still need a certified Turkish risk assessor, who would ensure translation into Turkish and would compile other risk assessment reports for the registrants.

The Turkish MoE organised the first meeting on KKDIK with industry associations and other stakeholders' organisations in June, according to Mr Babayigit.

As a candidate for EU membership, Turkey started the process of introducing REACH into its own legislation in 2011. The implementation project ended in 2013 with a draft regulation.

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## Further Information

[KKDIK draft regulation \(in Turkish\) \(https://kimyasallar.csb.gov.tr/uploads/file/KKD%C4%B0K-Taslak%20y%C3%B6netmelik-4%20A%C4%9Fustos%202014.rar\)](https://kimyasallar.csb.gov.tr/uploads/file/KKD%C4%B0K-Taslak%20y%C3%B6netmelik-4%20A%C4%9Fustos%202014.rar)

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