

# RULES AND PROCEDURES ON KKDIK REGISTRATION

(Published on 12.08.2025)

## PRE-REGISTRATION

### ARTICLE 5

2. Each potential registrant of a substance manufactured or imported in quantities of 1 ton or more per year **must submit a pre-registration** (Pre-SIEF) in order to continue manufacturing or importing.

## PRE-REGISTRATION DEADLINE

### ARTICLE 6

1. All registrants **must submit the pre-registration** to the Ministry via the Chemical Registration System (KKS) by **31.10.2025** and become a member of the Substance Information Exchange Forum.

2. For substances to be manufactured and/or imported for the first time after 31.10.2025, these substances **must be pre-registered** within **30 days** of being placed on the market.

## INDIVIDUAL REGISTRATION DOSSIER SUBMISSION

### ARTICLE 7

1. All registrants must be part of the same registration, unless they have a valid justification as set out in the Regulation.

2. Companies can submit registration dossiers individually, apart from the joint registration group, if the Ministry is notified with a **valid justification** and is provided with all information and documents supporting this justification.

*This article is mainly for Russian/Belarusian companies to submit an individual registration because of the sanctions imposed by the relevant consortiums.*

## LEADER REGISTRANT SELECTION

### ARTICLE 8

1. Lead Registrants for substances placed on the market before 12.08.2025 (*the publication date of the KKDIK Rules and Procedure*) shall be identified by **31.12.2025** at the latest.

2. The Lead Registrant shall be determined primarily on the basis of **volunteerism**. However, if there are no volunteers, the Ministry of Environment, Urbanisation and Climate Change will **designate a company as the Lead Registrant** in consultation with the Union of Chambers and Commodity Exchanges of Turkey (TOBB). This company will be chosen from among those with the highest tonnage, the most data and the largest company size, in order of priority.

3. The lead registrant candidate shall **notify all SIEF members** of its request to become a lead registrant through the KKS and shall conduct the necessary correspondence. Within **30 days** of the lead registrant candidate notification, all SIEF members must send their positive or negative opinions to the lead registrant candidate. Companies that do not respond to the lead registrant candidate within the specified timeframe are **considered to have provided a positive opinion**.

a. If the designated lead registrant candidate is **accepted by a simple majority** of the total number of SIEF members, the candidate is appointed as the lead registrant.

b. If the designated lead registrant candidate is **not accepted by a simple majority** of the total number of SIEF members, the candidate withdraws from leadership. The process of electing a new lead registrant from among the SIEF members shall start again.

4. The leader of a substance for which a registration dossier has not yet been submitted must carry out **SIEF communication**, including issues such as tonnage bands and data gap analysis. The leader shall notify SIEF members in writing of all details to be included in the SIEF agreement. If these topics are **accepted by a simple majority** of SIEF members, the leader can commence the registration process.

5. If these topics are **not accepted by a simple majority** of SIEF members, The process of electing a new lead registrant from among the SIEF members shall start again.

6. If the lead registrant of a substance for which a registration dossier has been submitted is unable to continue in this role, the lead company must notify all members of the relevant SIEF and submit a written request to the Ministry, providing the necessary information and documents. Following evaluation by the Ministry, permission will be granted to proceed with selecting a new leader through the system. Within the framework of leadership sharing rights and in accordance with the Ministry's privacy and data rights

principles, the current leader is obligated to transfer all necessary information and documents to the new leader within **30 days** of the Ministry's written approval.

7. Prior to the date of publication of these Procedures and Principles, the lead registrant selection for the substances for which the lead registrant has been designated but for which the registration dossier has not yet been submitted will be held again within the framework of these Procedures and Principles, if necessary.

## **TEMPORARY REGISTRATION**

### ARTICLE 10

1. The lead registrant shall make a **temporary registration** by submitting the data in Annex-1 of these Procedures and Principles to the Ministry by **31.03.2026**. Following the lead registrant's temporary registration, member companies shall submit their member registration dossiers to the Ministry by **30.09.2026**.

2. Companies that will submit an **individual registration** shall make a temporary registration by submitting the data in Annex-1 of these Procedures and Principles to the Ministry by **31.03.2026**.

5. The provisions of the above paragraphs of this article shall not apply to companies that will submit a **full registration** dossier until **31.03.2026**.

## **FULL REGISTRATION - COMPLETION OF THE REGISTRATION**

### ARTICLE 11

1. The registration of the companies submitting the **full registration** via individual registration or the lead registration for joint registration and the member registration dossier shall be completed within the deadlines specified in the KKDİK Regulation.

2. If the registrants are unable to provide the data required for the full registration dossier, the lead registrant of the relevant substance in case of joint registration or the relevant company itself in case of individual registration may request **additional time** to the Ministry.

5. The additional period to be granted by the Ministry under this paragraph is maximum **two years** after the registration deadline determined for the relevant tonnage band of the substance. If the data cannot be provided by the end of the additional timeframe, the

Ministry will approve or reject the registration of the substance in question once the reasons have been evaluated by the Chemical Advisory Group.

## **THE CHEMICALS SCIENCE GROUP**

### ARTICLE 12

1. The duties of the Chemicals Science Group, which is coordinated by the Ministry, are as follows:

- a. to provide information and assessments on current issues and problems relating to work and activities within the scope of chemicals management
- b. to conduct studies on education processes related to chemicals
- c. to assess issues identified by the Chemicals Advisory Group that cannot be resolved.

2. The Chemicals Science Group includes university lecturers who specialise in the effects of chemicals on human health and the environment.

4. The group is chaired by the Director General of Environmental Management.

## **THE CHEMICALS ADVISORY GROUP**

### ARTICLE 13

1. The duties of the Chemicals Advisory Group, which is coordinated by the Ministry, are as follows:

- a. to provide advice on the current situation, planned activities and international developments within the scope of chemicals management.
- b. to provide recommendations on the determination, monitoring and evaluation of plans, policies, strategies and actions related to chemicals management;
- c. to evaluate issues identified by the Chemicals Science Group that cannot be resolved.

2. The Chemicals Advisory Group shall consist of representatives from the Ministry of Health, the Ministry of Agriculture and Forestry, the Ministry of Trade, the Ministry of Industry and Technology, the Ministry of the Interior, the Ministry of Labour and Social Security, the Turkish Union of Chambers and Commodity Exchanges, and, when

necessary, other relevant institutions and organisations, as well as members of the Chemicals Science Group.

## **UPDATING REGISTRATION DOSSIERS**

### ARTICLE 15

1. Where a registration submitted under the Regulation needs to be updated, the registration dossier must be updated within **3 months** of the need arising. If circumstances prevent this, the situation shall be reported in writing to the Ministry with detailed justification, and an additional time shall be requested.

## **SAFETY DATA SHEETS**

### ARTICLE 16

1. Safety data sheets are uploaded by the **supplier**\* to the Ministry's SDS Portal.

*\* Manufacturer, importer, downstream user or distributor placing a substance on the market in its own form or in a mixture*

## **ANNEX 1**

Information requirements and section numbers in the Chemicals Registration System (KKS) that Lead/Individual Registrants must provide for **Temporary Registration**:

### **1. Substance Identification (KKS Section 1.1)**

1.1. Substance Composition (KKS Section 1.2)

1.2. Analytical Information (KKS Section 1.4)

1.3. Suppliers: In this section, companies enter the names of their company's downstream-users and keep this information up to date. This update is not subject to a fee (KKS Section 1.7).

1.4. Common application (KKS Section 1.5)

### **2. Globally harmonised System (KKS Section 2.1)**

### **3. Manufacturing, use, exposure information (KKS Section 3)**

3.1. Estimated Quantities (KKS Section 3.2)

3.2. Facilities (KKS Section 3.3)

3.3. Information on mixtures (KKS Section 3.4)

3.4. Information on use and exposure (KKS Section 3.5)

3.5. Not recommended uses (KKS Section 3.6)

### **4. Physical and Chemical Properties (KKS Section 4)**

### **5. Guide for Safe Use (KKS Section 11)**

Note: The information requirements numbered 1 and 3 above must be entered by member companies in the relevant sections of the KKS.

## TABLE OF DEADLINES

The deadlines outlined in the Rules and Procedures of KKDIK Registration are as follows:

Deadline	KKDIK Application	Remark
31.10.2025	Pre-registration	<b>30 days</b> of being placed on the market for those manufactured and/or imported for the first time after 31.10.2025
31.12.2025	Determination of the Lead Registrants	
31.03.2026	Temporary registration	For also Individual Registration
30.09.2026	Member registration for Temporary Registration Dossier	
31.12.2026	Registration (1000+ t/y)	
31.12.2028	Max. additional time for Registration (1000+ t/y)	
31.12.2028	Registration (100-1000 t/y)	
31.12.2030	Max. additional time for Registration (100-1000 t/y)	
31.12.2030	Registration (1-100 t/y)	
31.12.2032	Max. additional time for Registration (1-100 t/y)	