

13.08.2025 TKSD Executive Summary: Procedures and Principles Regarding the Implementation of the KKDIK Regulation

On 12 August 2025, "Procedures and Principles Regarding the Implementation of the KKDIK Regulation" has been published by the Ministry of Environment, Urbanisation and Climate Change of the Republic of Türkiye.

Roles and responsibilities were defined through Procedures and Principles, and the registration schedule was clarified. The key points and critical dates/deadlines in this regard are as follows:

Pre-Registration Deadlines

- Pre-Registration for Existing Substances: All registrants must submit their preregistration (pre-SIEF) to the Ministry via the Chemical Registration System (KKS) by 31.10.2025. <u>SEE: ARTICLE 6 – (1)</u>
- Pre-Registration for New Substances: For substances to be manufactured and/or imported for the first time after 31.10.2025, pre-registration must be completed within 30 days after the substance is placed on the market. <u>SEE: ARTICLE 6 (2)</u>

Determination of the Lead Registrant

- Lead registrants for substances placed on the market before the publication of the *Procedures and Principles* must be identified by 31.12.2025 at the latest. <u>SEE:</u> <u>ARTICLE 8 - (1)</u>
- For substances that are to be placed on the market for the first time after the publication of the *Procedures and Principles*, the lead registrant must be determined within 6 months. SEE: ARTICLE 8 (1)
- Volunteerism is the primary criterion for determining leading companies. If there are
 no volunteer companies, the Ministry will initiate efforts to determine a leading
 company from among the manufacturers/importers of the substance to be
 registered, taking into account criteria such as tonnage range, available data, and
 company size, and consulting with the Union of Chambers and Commodity
 Exchanges of Türkiye (TOBB). SEE: ARTICLE 8 (2)



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Provisional Registration

- If the lead registrant fails to fulfil the obligations regarding full registration, they must submit the data listed in Annex-1 of the *Procedures and Principles* to the Ministry by **31.03.2026** to carry out a transitional registration. **SEE: ARTICLE 10 (1)**
- Following the transitional registration of the lead registrant, companies that will become member registrants must submit their member registration dossiers to the Ministry by 30.09.2026. <u>SEE: ARTICLE 10 (1)</u>
- Companies that opt out the joint registration and intend to submit their dossiers individually, but fail to fulfil full registration obligations, must also submit the data listed in Annex-1 of the *Procedures and Principles* to the Ministry via KKS by 31.03.2026 to carry out a transitional registration. SEE: ARTICLE 10 (2)

The dates mentioned above regarding Provisional Registration will not apply to companies that submit a full registration dossier by 31.03.2026.

Establishment of the Expert Advisory System

Two new structures, the Chemicals Science Group and the Chemicals Advisory Group, will be established through *Procedures and Principles* under the coordination of the Ministry of Environment, Urbanisation and Climate Change:

- The Chemicals Science Group, composed of academics from universities, will evaluate the effects of chemicals on the environment and human health and provide scientific support to the registration process.
- The **Chemicals Advisory Group**, to be established under the chairmanship of the General Directorate of Environmental Management, will determine plans, policies, strategies, and actions related to the management of chemicals and will carry out monitoring and evaluation activities.



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