Turkey CLP (SEA)

Classification, Labelling and Packaging Regulation

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Turkey CLP (SEA) Regulation No: 28848 / 2013, Dec. 11 th

TURKEY CLP CORE REGULATION

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Turkey CLP Regulation was published in December 11 th, 2013 with official gazette numbered 28848.

It was mostly identical with EU CLP Regulation 1272/2008, ATP 3 until the last update of Turkey CLP.

TRANSITION PERIOD FOR TURKEY CLP

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For the new substances / already placed on the market:

As of 1 June 2015

1 Janurary 2017

For the new

Mixtures / already placed on the market:

As of 1 June 2016

1 June 2018

THE SCOPE OF TURKEY CLP

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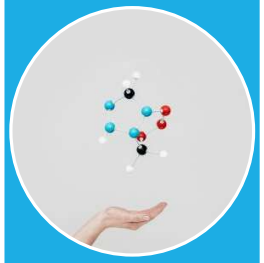
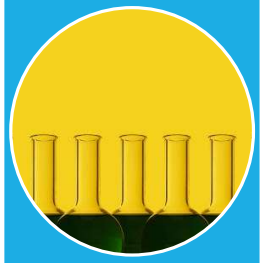
Classification
Labelling
Packaging



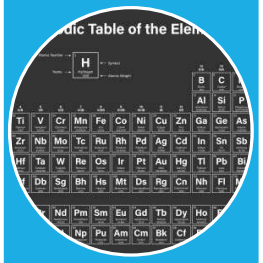
Provisions of substance and mixtures

Supplier provisons

Provisions of manufacturers, article producers and importers



The preparation of Annex 6 list



C&L Notification

Preparation of C&L Inventory

TURKEY CLP SHALL NOT APPLY TO THE FOLLOWING:

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Radioactive Materials.

Substances and mixtures which are subject to customs supervision

Non-isolated intermediates;

Substances and mixtures for scientific research and development

Wastes

The transport of dangerous goods

The substances and mixtures for defense purposes.

TURKEY GHS SHALL NOT APPLY TO THE FOLLOWING:

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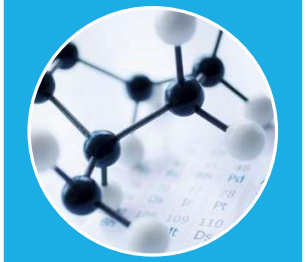
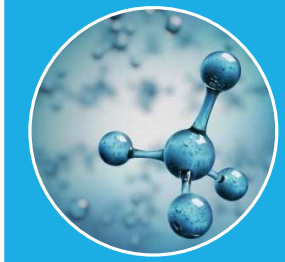
Medicinal products



Veterinary medicinal products

Cosmetic products



Medical devices

Food and Food Additives.

Feeding Stuff.

TURKEY CLP UPDATE

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Turkey CLP was updated on 20 December 2020 in Official Gazette numbered 31330.

It was adopted to EU CLP Regulation 1272/2008 ATP 13 (except for the 12th).

Annex-8, Annex-9, Annex-10 and Annex-11 of the Turkey CLP were directed to KKDIK.

Annex-7 was repealed after update of SEA Regulation.

TURKEY CLP ANNEXES AFTER UPDATE

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- Annex 1: Classification And Labelling Requirements For Hazardous Substances And Mixtures
- Annex 2:Special Rules For Labelling And Packaging Of Certain Substances And Mixtures
- Annex 3:List Of Hazard Statements, Supplemental Hazard Information And Supplemental Label Elements
- Annex 4:List Of Precautionary Statements
- Annex 5:Hazard Pictograms
- Annex 6:Harmonised classification and labelling for certain hazardous substances

SITUATION OF TURKEY CLP ANNEX AFTER UPDATE

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~~Annex 7~~

Repealed

Annex 8

Annex 9

Annex 10

Annex 11

Directed to KKDIK Regulation.

TURKEY CLP UPDATE

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Notification of hazardous substances to C&L (SEA) inventory through KKS

Exemption: C&L notification of the substances registered according to the KKDİK

"Obligation to Notify".

TURKEY CLP UPDATE

Article 45:

“National Poison Center”.

Obligation:

Providing detailed information for hazardous chemicals to Ministry of Health National Poison Center

(1 Janurary 2025)

POISON CENTER NOTIFICATION

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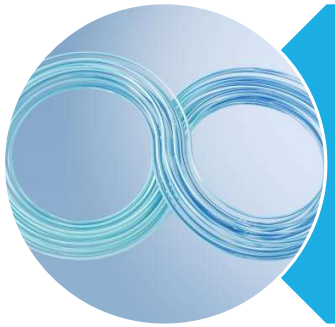

Article 44/A: Notification to the National Poison Center will take effect on 01/01/2025.

Notification format will be determined by the Ministry of Health may delay the enforcement of this provision in 2025.

MINIMUM DIMENSIONS OF LABELS AND PICTOGRAM UNDER TURKEY CLP

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Capacity of the package	Dimensions of the label (in milimeters)	Dimensions of the pictograms (in milimeters)
≤ 3 litres	If possible, at least 52 x 74	Not smaller than 10 x 10 If possible, at least 16 x 16
>3 litres but ≤ 50 litres	At least 74 x 105	At least 23 x 23
>50 litres but ≤ 500 litres	At least 105 x 148	At least 32 x 32
>500 litres	At least 148 x 210	At least 46 x 46

LABEL ELEMENTS IN TURKISH LABEL

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Hazard Pictograms

Signal word

Tehlike

Hazard Statements

H222	Çok kolay alevlenir aerosol.
H229	Basınçlı kap: ısıtıldığında patlayabilir.
H315	Cilt tahrişine yol açar.
H317	Alerjik cilt reaksiyonlarına yol açar.

Precautionary Statements

P210	Isıdan, kıvılcımdan, alevden, sıcak yüzeylerden uzak tutun. – Sigara içilmez.
P211	Aleve veya diğer ateş kaynaklarına doğru püskürtmeyin.
P251	Basınçlı kap: Kullanımdan sonra bile delmeyin veya yakmayın.
P261	Buharını/spreyini solumaktan kaçının.
P280	Koruyucu eldiven/koruyucu kıyafet/göz koruyucu/yüz koruyucu kullanın.
P302+P352	DERİ İLE TEMAS HALİNDE İSE: Bol sabun ve su ile yıkayın.
P304+P340	SOLUNDUĞUNDA: Zarar gören kişiyi temiz havaya çıkartın ve kolay biçimde nefes alması için rahat bir pozisyonda tutun.

Contains: İzobütil alkol, etanol, propan

The ingredients which effect to the human health and caused hazard statements.

❖ Labels must be in Turkish.

İZOBÜTİL ALKOL

CAS No: 78-83-1

TEHLİKE

Alevlenir sıvı ve buhar. Cilt tahrişine yol açar. Ciddi göz hasarına yol açar.
Solunum yolu tahrişine yol açabilir. Rehavete veya baş dönmesine yol açabilir.

Koruyucu eldiven ve göz/yüz koruyucu kullanın. Sadece dışarıda veya iyi havalandırılan bir alanda kullanın. Isıdan/kıvılcımdan/alevden/sıcak yüzeylerden uzak tutun. – Sigara içilmez. Tozunu/dumanını/gazını/sisini/buharını solumayın. GÖZ İLE TEMASI HALİNDE: Su ile birkaç dakika dikkatlice durulayın. Takılı ve yapması kolaysa, kontak lensleri çıkartın. Durulamaya devam edin. YUTULDUĞUNDA: ULUSAL ZEHİR DANIŞMA MERKEZİNİN 114 NOLU TELEFONUNU veya doktoru/hekimi arayın. SOLUNDUĞUNDA: Zarar gören kişiyi temiz havaya çıkartın ve kolay biçimde nefes alması için rahat bir pozisyonda tutun. DERİ (veya saç) İLE TEMAS HALİNDE İSE: Kirlenmiş tüm giysilerinizi hemen kaldırın/çıkartın. Cildinizi su/duş ile durulayın. Ciltte tahriş söz konusu ise: Tıbbi yardım/müdahale alın. Yangın durumunda: Söndürme için alkole dayanıklı köpük, karbon dioksit, kuru toz ve su spreyi kullanın. İyi havalandırılmış bir alanda depolayın. Soğuk tutun. Kilit altında saklayın. İçeriği/kabı tehlikeli veya özel atık toplama noktasında bertaraf edin.

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A SAMPLE TURKISH LABEL ACCORDING TO TURKEY CLP

Missing Hazard Statements on Turkey CLP compared to GHS

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- Acute Tok. 5 - H303
- Asp. Tok. 2 - H305
- Acute Tok. 5 - H313
- Skin Irrit. Cat 3 -H316
- Desentized exp. Cat 1 - H206
- Desentized exp. Cat 2-3-H207
- Desentized exp. Cat 4 - H208
- Flam. Gas. Cat. 1A - H232
- Eye Irrit. 2A-2B - H320
- Acute Tok. 5 - H333
- Aquatic toxicity cat 2 - H401
- Aquatic toxicity cat 3 - H402

✓There are also additional Hazard Statements called as EUH in Turkey CLP Regulation.

CHEMLEG's Turkey CLP Compliance Services

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- Determination of the classification of the substances,
- C&L Notification,
- Providing labelling information
- Generating Turkish supplier label.
- Consultancy services on Turkey CLP.

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Available Regulations for Turkish Safety Data Sheet

Turkey SDS Regulation, No: 29204

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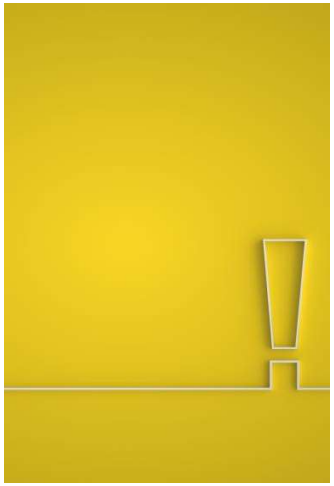
- ✓SDS for Substance/Mixtures
- ✓Experts having "**Safety Data Sheet Authorized Certificate**"
- ✓**SDS in Turkish** language
- ✓Certificate information on the 16th Section SDS
- ✓16 main sections and 48 subsections.

Turkey SDS Regulation and KKDIK Annex-2

- Turkey SDS Regulation shall be repealed as of 01/01/2024.

- Experts having SDS Authorized Certificate can prepare SDS in compliance with Turkey SDS Regulation until 31/12/2023.

- CAE can prepare SDS in compliance with both Turkey SDS and KKDIK Regulation until 31/12/2023.



CHEMLEG's Turkey SDS Compliance Services

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- Creating of the SDS form scratch.
- Reviewing of the SDS that created by customers
- Correcting services
- Adding certification services.
- Consultancy services on Turkey SDS Regulations.

Summary Turkey Regulatory Compliance

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Regulation	Requirements	Dates
Turkey CLP (SEA) Regulation	- Labelling in Turkish	- In force
	- Notification to C&L Inventory	- Within 1 month after marketed the products
Turkey SDS Regulation	- SDS in Turkish	- In force
	- SDS prepared by certified experts	- In force

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THANK YOU VERY MUCH!

KKDIK Regulation, No:30105

By-Law on Registration, Evaluation, Authorization and Restriction of Chemicals

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KKDIK (Turkey REACH) Regulation No: 30105

KKDIK (Turkey REACH) Regulation

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Chemical substances own by own, in *mixtures or in articles.*

Regulation Name	Date	Regulation No	Ministry	Abb. of the Regulation
Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (KKDIK Regulation)	23 June 2017	30105	Ministry of Environment and Urbanization of Turkish Republic	KKDIK Regulation or Turkey REACH Regulation

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Core Points for KKDIK

(1/2)

1. The implementation of KKDIK is almost the same with EU REACH.
2. EU REACH registration of the substances won't be valid. The scoped substances need to be registered for KKDIK.
3. The potential registrant companies can purchase REACH registration data for KKDIK.
4. The corresponding tests won't be renewed for KKDIK if they have been performed for EU REACH.

Core Points for KKDIK

(2/2)

5. Registration will be realised in two steps;
   Pre-Registration Step & Registration Step

6. Official fees for registration depending on the criteria such as joint submission, individual submission, company size, tonnage band.

7. The (Pre)Registration are done via Chemical Registration System; KKS

8. KKDIK Registration dossiers will be compiled by Chemical Assessment Experts.

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Updates for KKDIK

1. Draft Turkey CLP (SEA) Regulation was published by MoEU.
2. Improve & Update of KKS according to the latest version of IUCLID.
3. ECHA guidance are being translated into Turkish. Chemleg is managing the project.
4. Completion of the Candidate List.

Basic Differences Between KKDIK and EU REACH

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The most important difference between KKDIK and EU REACH is “Chemical Assessment Expert” concept.

“Chemical Assessment Expert” is required only for Registration dossier Compilation/Approval.

Although EU REACH has 17 numbers of Annexes, KKDIK has 18 numbers of Annexes.

KKDIK Annex-XVIII is regarding with the Chemical Assessment Expert definitions and requirements.

Registration Period

Important Dates for Pre-Registration and Registration

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23/12/2017- 31/12/2020	01/01/2021- 31/12/2023	01/01/2024 and later
Pre-Registration	**Registration**	
Consider as a chance for … *After the deadline, still the pre-registration can be done by the companies.* *But there is no official statement regarding with the extended of the deadline.*	SIEF members of substances start communication and take action on going registration.	Not Registered Substances can be manufactured or imported or placed on the market after completion of Registration.

SIEF Communications

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To be reached the other pre-SIEF members after completion of the Pre-Registration

To contact via e-mail with other pre-SIEF members to inform them regarding to be Lead candidate

To select being the being Lead Candidate to be voted by other pre-SIEF members through KKS

Communications with the pre-SIEF members regarding with the details and survey

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Who can be Lead Registrant

Lead Registrant will be determined during the SIEF communications.

There is not any special KKDIK regulative provision for being "Lead registrant".

The lead registrant could be the largest producer or data owner or etc.

How is the Letter of Access process?

- Creation and organisation of SIEF from the pre-SIEF
- Election of the Lead Registrant
- Collection and organisation of data, technical dossier, CSR information by the Lead Registrant
- Submission of registration dossier by the Lead Registrant
- Paying LoA fee by the Co-Registrants to the Lead Registrant
- Having Token from the Lead Registrant
- Submission of the individual parts of the registration dossier by the Co-Registrant
- Generation of «Registration Number»

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