



17 January 2024

Subject: Ashland update on progress towards KKDIK substance registration.

Dear valued Customer,

We received your inquiry regarding whether products from Ashland Inc. and its subsidiaries, sold to the Turkish market, are compliant with Turkish Chemical Regulations as described below;

- By-law on The Safety Data Sheets for Hazardous Substances and Mixtures (13.12.2014 /29204) (GBF)
- By-law on The Classification, Labelling and Packaging of Substances and Mixtures (11.12.2013/28848) (SEA)
- The Turkish regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals (23.06.2017/30105 (Bis)) (KKDIK)

Ashland is aware of the upcoming KKDIK registration deadline and committed to joining or leading registrations in order to maintain our current and future commercial plans in Turkey.

We are pleased to confirm that our products sold from our Turkish legal entity comply with these regulations, as to ensure that the supply of goods to our customers is not disrupted.

As you are aware GBF, SEA and KKDIK regulations require the manufacturers/importers or the downstream users to meet certain obligations;

- SEA
 - *Labelling & Packaging:* substances classified as hazardous per the CLP/GHS, shall be Labelled in Turkish and packaged in accordance to the regulation.
 - *Notification:* substances classified as hazardous and imported into Turkey either on their own or in a mixture above the concentration limits, results in the classification of the mixture as hazardous shall be notified.
- KKDIK
 - *Registration:* substances manufactured or imported in quantities of one tonne or more per year per manufacturer or importer, unless they are exempted from the scope of registration, shall be registered.
 - *Deadlines* for registration are as below;
 - 31-Dec-26
Substances at $\geq 1\ 000$ t/a
Substances classified as Aquatic Acute 1 and Aquatic Chronic 1 (H400, H410) at ≥ 100 t/a
CMR substances (Category 1A and 1B) at ≥ 1 t/a
 - 31-Dec-28
Substances at 100 – 1 000 t/a.
 - 31-Dec-30
Substances at 1 - 100 t/a
- GBF
 - *Language and Format:* SDS shall be provided in Turkish and in the required format.
 - *Authorization:* Turkish SDS shall be authorized by a Turkish certified expert.
 - *Notification:* Authorized Turkish SDS shall be submitted to the Ministry.
 - *Validity:* Turkish SDSs could be prepared per the regulation by 31.12.2023.

To avoid our customers importing Ashland products into Turkey having to notify / register substances involved, Ashland Inc. has assigned "**Ashland Özel Kimyasallar Tic. Ltd. Şti**" as their Only Representative (OR) per the regulations SEA and KKDIK. Following this appointment, our OR has notified / registered substances involved. Therefore, customers are relieved from their obligations as an importer and become a downstream user of Ashland under these regulations in Turkey.

Substance(s) in our product portfolio have been notified where applicable under the SEA regulation and the notifications are kept updated. (Pre)/Registrations will also be completed under KKDIK, where applicable.

Hazard classifications, Safety Data Sheets (SDS) and labels for Ashland products are compliant with both the SEA and GBF Regulations, following the most recent deadline of June 2016.

IMPORTANT DISCLAIMER: While it is our intention to Register, those substances sold to the Turkish market, we cannot guarantee or absolutely commit to future Registration. Ashland's product portfolio is subject to continual evaluation and optimization based on market and customer needs, including market size and profitability. Ashland is dependent on what information is received from its suppliers about the presence of SVHCs contained in purchased materials that compose Ashland's products. Ashland retains the right to discontinue any product, and no rights can be derived from this publication and Ashland disclaims any liability for any errors or omissions.

If you have questions regarding KKDIK or any other REACH- related subject, please contact us via your Ashland representative or send us an e-mail at kkdik_turkey@ashland.com (KKDIK) or REACH@ashland.com (REACH).

Kind regards,



Ryan Hamilton

Manager – REACH Ashland

<http://www.ashland.com/about/sustainability/product/reach>

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