



6 December 2017

**Subject:** Ashland response to questions on compliance towards Turkish Chemical regulations.

Dear valued Customer,

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

- 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)
- By-law on The Safety Data Sheets for Hazardous Substances and Mixtures (13.12.2014 /29204) (GBF)

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

As you are aware SEA, KKDIK and GBF 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 are as below;
    - Pre-SIEF (Pre-registration) 31.12.2020
    - Registration 31.12.2023
  - Our current intention is that we will pre-register all the substances that Ashland manufactures and exports to Turkey prior to the deadline. We are also working with our suppliers to ensure that they will pre-register and ultimately register. While it is our intention to ensure registrations

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**IMPORTANT DISCLAIMER:** While it is our intention to pre-register and register those substances manufactured and imported by Ashland in the EU, 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.

for substances exported to Turkey, 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.

To avoid our customers importing Ashland products from Ashland into Turkey having to notify/(pre-)register substances involved, Ashland LLC has appointed "ISP International Corp. Merkezi ABD Türkiye İstanbul Şubesi" as their Only Representative (OR) per the regulations SEA and KKDIK. Following this appointment, 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 by our OR, where applicable. When the registration phase starts, we will establish a relationship with customers importing from Ashland which will relieve them from their registration obligations as an importer and become a downstream user of Ashland LLC under these regulations in Turkey.

#### Non-TURKISH Customers

Ashland's non-TURKISH customers exporting their products within the scope of KKDIK to Turkey must ensure that their Turkey based importer will (pre-)register any of the relevant substances or monomers which are imported at levels over one metric ton per year. Ashland does not cover third-party imports through an Ashland Only Representative. To ensure you remain compliant with KKDIK, it is recommended that customers purchase materials from Ashland Turkey. We are happy to advise you which (alternative) materials are available for you.

- 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. You will find this information in section 16 of our SDS.
  - Notification: Authorized Turkish SDS shall be submitted to the Ministry.
  - Validity: Turkish SDSs could be prepared per the regulation by 31.12.2023.

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.

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

Kind regards,



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