

EMAIL to the co-registrants of the following substance:

Pentacalcium hydroxide tris(orthophosphate) / Bone Ash / Hydroxyapatite (IP24)

EC 235-330-6 / 270-423-5 / 215-145-7

CAS 12167-74-7 / 68439-86-1 / 1306-06-5

Subject: Co-registrant survey on nanomaterial IP24, Inorganic Phosphates (IP) REACH Consortium

To all co-registrants,

This communication is to inform you that the lead registrant of the substance, Chemische Fabrik Budenheim KG, Rheinstr. 27, 55257 Budenheim, Germany, is considering to update its REACH dossier, including the nanomaterials section.

On 1 January 2020 the new nano regulation ([COMMISSION REGULATION \(EU\) 2018/1881 of 3 December 2018](#)) came into force, officially defining nanomaterial as follows:

On the basis of the Commission Recommendation of 18 October 2011 on the [definition of nanomaterial](#), a nanoform is a form of a natural or manufactured substance containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm-100 nm, including also by derogation fullerenes, graphene flakes and single wall carbon nanotubes with one or more external dimensions below 1 nm.

For further information on nanomaterials in the context of REACH and CLP, please see: [Nanomaterials in REACH and CLP - Environment - European Commission](#) and [Nanomaterials - ECHA](#).

In order to correctly evaluate the need to update the dossier of IP24 and possibly include nanomaterials, **please let us know if your registered material falls under the a.m. nanomaterial definition.**

If you have not completed testing your material with respect to nanoforms yet, please still let us have the information already known to you by now and provide an estimated timeline by when further results can be expected.

Your cooperation is important and highly appreciated in order to make sure that all registered materials under the joint registration of IP24 still fit into the boundaries, including nanomaterials, in the future.

Please direct your feedback until February, 10, 2021 to secretary@inorganic-phosphates.org.

In case of any questions, do not hesitate to contact us.

Many thanks for your cooperation.

With kind regards,

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