

SUBJECT

Zirconium Dioxide non-nano form lumped use mapping and impact on
Letter of Access

DATE

11 December 2023

FROM

Mixed Oxides and Zirconium Oxides Consortium

Dear co-registrants of zirconium dioxide (CAS 1314-23-4 / EC 215-227-2),

In view of the upcoming dossier update, a revision of the lumped use mapping for zirconium dioxide non-nano has been carried out. This update was performed through a new survey circulated among the MoZo Consortium members involved to identify or reiterate any relevant uses and to adjust the dossier to the most recent use mapping rules published by ECHA.

For the non-nano dossier, as announced under the MISA (Metals and Inorganics Sectorial Approach) program, the reason for this update is voluntary. For your information, this update remains to be completed and submitted. However, we can already present you with the new version of the use mapping (non-nano). For this reason, we ask you to carefully review the attached lumped uses file for zirconium dioxide and react should you have any comments or questions. We remind you that a silent approval approach will be followed, meaning that there is NO written approval needed on your behalf. A reply is expected only in case of comments or questions and before the deadline indicated below.

We kindly ask you to **submit your feedback (if any) to the e-mail address below by January 29, 2023.**

For up-to-date information on the status of the dossier, please visit the Mixed Oxides and Zirconia Oxides (MoZo) website, and more particularly:

- The news page: [News | Mozo \(mozoreach.eu\)](https://www.mozoreach.eu/news)
- The page devoted to Zirconium Dioxide (pure): [Zirconium Dioxide \(pure\) \(Annex X + IX + VIII + VII + TII<1ktpa\) | Mozo \(mozoreach.eu\)](https://www.mozoreach.eu/zirconium-dioxide-pure)

A new communication will be done when the joint dossier is resubmitted, and a new joint CSR will be provided. Said CRS should be added when updating your co-registration.

Important notice:

It is not the objective of the MoZo Consortium to cover all the possible uses of ZrO₂. If your use is not covered, or you wish to keep it confidential, you are then invited to proceed with your own use description.

If you would like to add a new (non-confidential) use to the use mapping, we will bring this request to the attention of the members of the MoZo consortium, who will decide whether to include this new use in a future revision of the use mapping.

Impact on LoA (Letter of Access) cost

The preparation of an update of the use mapping is considered relevant for all registrants in all tonnage bands. Therefore, the costs exposed by the MoZo consortium to establish this update are part of the dossier costs and will be reflected in the final costs of the LoA.

The current costs of the LoA per tonnage band already include a provision for future work on the dossier. See: [zro2 20170714-sief comm loa.pdf \(mozoreach.eu\)](https://www.mozoreach.eu/zro2-20170714-sief-comm-loa.pdf)

Part of this provision has already been used to maintain the registration dossier. The balance will of course be used to finance the abovementioned work on the dossier. Depending on the total cost for this update, the remaining provision may be insufficient. In such a case, the cost of the LoA per tonnage band shall be adapted accordingly and an additional invoicing to all the co-registrants can be deemed necessary.

If you need assistance, have specific questions, or you need more time, do not hesitate to contact Arcadis.

Kind regards,

ARCADIS on behalf of the members of the Mixed Oxides & Zirconium Oxides consortium

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Visit our website: <http://mozoreach.eu>