

Joint Communication from HARRPA, H4R Consortium, and PCA regarding the opening of the Public Consultation for Rosin and some Rosin derivatives

Monday the 1st of September, ECHA published the CLH reports for the substances listed below in Table 1. Consequently, the Public Consultation is now open and spans 60 days, during which stakeholders are invited to provide comments on the hazard classes proposed in the CLH report. The CLH reports submitted by the Norwegian Environment Agency will undergo an evaluation by the Risk Assessment Committee of the ECHA over the next 12 months. The CLH reports can be found [here](#).

Please also see our previous joint public communication: [HARRPA H4R PCA Rosin DU comm 20241114](#)

Table 1. Rosin and rosin derivatives of CLH reports as published by ECHA on the 1st September 2025

CAS	EC	Substance	H4R Category	Proposed harmonised classification of CLH reports (Updated 1st September 2025)	Hazard code
8050-09-7	232-475-7	Rosin; colophony	1	Repr. Cat. 1B	H360Df
65997-05-9	500-163-2	Rosin, oligomers	1	Repr. Cat. 1B	H360Df
65997-06-0	266-041-3	Rosin, hydrogenated	1	Repr. Cat. 2	H361f
65997-04-8	266-040-8	Rosin, fumarated	3	Repr. Cat. 2	H361f
8050-28-0	232-480-4	Rosin, maleated	3	Repr. Cat. 1B	H360D
	500-451-8	Fatty acids, tall oil, oligomeric reaction products with maleic anhydride and rosin, calcium magnesium zinc salts	Cease of Manufacture / No Active registrations	Repr. Cat. 2	H361f
94581-17-6	305-516-2	Resin acids and Rosin acids, maleated, esters with pentaerythritol	4	Repr. 2	H361fd
97489-11-7	307-051-0	Resin acids and Rosin acids, fumarated, esters with glycerol	4	Repr. 2	H361d

The H4R Consortium and PCA are reviewing the CLH reports for Harmonised Classification and Labelling and intend to submit documents during the public consultation. The submitted documents will include:

- all relevant scientific information on the toxicity to reproduction (or lack thereof) of Rosins and derivatives,
- the outcome of the two new investigative studies sponsored by H4R and PCA, which provide evidence to support our position that **none of these substances raise concern for reprotoxicity hazard and therefore do not meet the criteria for classification.**

During public consultation, all stakeholders are invited to provide relevant information, including:

- Toxicological data, such as information on the intrinsic toxicological properties of rosin and rosin derivatives and/or mechanistic studies.
- information about the use of the substance, including its essentiality and critical technical function in your applications, exposure conditions and risk management measures currently in place.

Should you possess such data, we advise to contact the H4R consortium secretariat. The secretariat is equipped to provide comprehensive support throughout the submission process, ensuring that your valuable information is integrated into the consortium's assessments.

Further information is being generated and an updated communication will follow once the CLH reports have been reviewed.

An online Webinar will be organized on the 14th October, 15:00 CET to provide your organization with status, next steps and guidance on the public consultation phase. More information will follow once it becomes available. In case you have any questions or would like to share any information with us, please contact us at manager@h4rconsortium.com.

On behalf of the members of [HARRPA](#), [H4R Consortium](#), and [PCA](#).