

HARRPA-PCA-H4R joint statement on RAC CLH Working Group draft recommendation on the listing of rosins and selected rosin derivatives

On 29 June 2026, ECHA's Risk Assessment Committee (RAC)-78 CLH Working Group examined the proposed harmonised classifications of rosin and selected rosin derivatives under the CLP Regulation. The CLH Working Group (WG) concluded for all eight substances that harmonized classification as toxic to reproduction is warranted (see details in the table). HARRPA, H4R and PCA strongly disagree with their recommendations. The Pine Chemicals industry remains of the view that no classification is the only justified scientific decision for these substances except for Rosin, maleated, as explained in detail in the previous communication available [here](#).

We acknowledge that the CLH Working Group has considered our information submitted during the RAC Opinion development process. Although the RAC opinion will only be finalised later this year, it appears that the additional studies submitted by H4R and PCA have led to the removal of the proposed 1B classification for reprotoxicity for Rosin (EC 232-475-7) and Rosin, maleated (EC 232-480-4). If adopted, this opinion will ensure that the substances remain outside the scope of REACH Restriction Entry 30 and, consequently, can continue to be supplied to the general public in Europe. This is a significant step in the right direction and an important achievement for the pine chemicals industry and its downstream users.

HARRPA, H4R and PCA still believe this proposed classification is unjustified as all effects observed can be explained¹ by maternal undernutrition and are therefore not real reproductive effects. Consequently, HARRPA, H4R and PCA will remain committed to working towards a non-classification including generating new data to support our scientific position.

The process now continues towards the RAC's formal opinion, expected during the RAC-78 plenary session in September 2026, which will in turn inform the European Commission's decision and any subsequent adaptation of the CLP Regulation. The European Commission will deliberate with Member States and stakeholders in 2027 on the inclusion of Rosins and Rosin derivatives in Annex VI of CLP, with a final decision towards the end of the year and publication in early 2028. As transition periods apply, any change to the classification and labelling of rosins and rosin derivatives will come into application by 2030.

HARRPA, H4R and PCA will therefore remain fully engaged throughout the next stages of the process, ensuring that the conclusions of the recently finalised independent Socio-Economic Assessment, alongside the scientific, technical and socio-economic information, remain accessible and clearly explained through the appropriate channels as discussions progress, to inform the final decision and that the real-world consequences of any classification are properly understood.

All relevant documentation is available at our websites [HARRPA](#), [H4R](#) and [PCA](#).

¹ [Statistical and experimental approaches to discriminate between substance-specific reproductive effects and those mediated by maternal undernutrition – A case study with Rosin and derivatives - ScienceDirect](#)

Table I:

Substance	Dossier Submitter Proposal	RAC CLH WG Proposal	HARRPA-PCA-H4R position²
Rosin (EC 232-475-7, CAS 8050-09-7)	Cat 1B (H360Df)	Cat 2 (H361fd)	No classification
Rosin, hydrogenated (EC 266-041-3, CAS 65997-06-0)	Cat 2 (H361f)	Cat 2 (H361f)	No classification
Rosin, oligomers (EC 500-163-2, CAS 65997-05-9)	Cat 1B (H360Df)	Cat 1B (H360Df)	No classification
Rosin, fumarated (EC 266-040-8, CAS 65997-04-8)	Cat 2 (H361f)	Cat 2 (H361f)	No classification
Rosin, maleated (EC 232-480-4, CAS 8050-28-0)	Cat 1B (H360D)	Cat 2 (H361d)	Cat 2 (H361d)
Fatty acids, tall-oil, oligomeric reaction products with maleic anhydride and rosin, calcium magnesium zinc salts (EC 500-451-8, CAS 160901-14-4)	Cat 2 (H361f)	Cat 2 (H361f)	No classification
RARA, fumarated, esters with glycerol (EC 307-051-0, CAS 97489-11-7)	Cat 2 (H361d)	Cat 2 (H361d)	No classification
RARA, maleated, esters with pentaerythritol (EC 305-516-2, CAS 94581-17-6)	Cat 2 (H361fd)	Cat 2 (H361f)	No classification

² H4R and its members, as registrants of the substances are currently reviewing the self-classification of all substances. This process is pending a final decision by the European Commission on the proposed harmonised classifications.