

HARRPA-PCA-H4R joint statement on Risk Assessment Committee (RAC) recommendation on the listing of rosins and selected rosin derivatives

On 08 September 2026, ECHA's Risk Assessment Committee (RAC) had their 78 Plenary meeting, during which their recommendation to the European Commission for the harmonised classifications of rosin and selected rosin derivatives under the CLP Regulation, was adopted. The RAC concluded for all eight substances that harmonized classification as toxic to reproduction is warranted (see details in the [Table 1](#)).

The RAC Opinions publication is expected in the coming months. Following the publication, the European Commission will deliberate with Member States and stakeholders (HARRPA and H4R will be part of these discussions) 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 strongly disagree with RAC's 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 RAC has considered the information submitted during the RAC Opinion development process. It appears that these additional studies submitted by H4R and PCA have contributed 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 as proposed, these substances will 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 the effects observed can be explained by maternal undernutrition and are therefore not real reproductive effects. Consequently, HARRPA, H4R and PCA will remain committed to working towards non-classification, including generating new data to support our scientific position.

In addition to generating new scientific evidence, the three organizations will continue to be fully engaged throughout the next stages of the process, ensuring that the conclusions of the recently finalised independent Socio-Economic Assessment are clearly explained through the appropriate channels as discussions progress, to inform the final decision and to ensure that the real-world consequences of any classification are properly understood.

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

**Table 1**

Substance	DS Proposal	RAC Final Opinion	HARRPA-PCA-H4R position
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) ¹
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

¹ H4R and its members, as registrants of the substance are currently reviewing self-classification. This process is pending a final decision by the European Commission on the proposed harmonised classifications.