

# Rosin-Skin Sensitization Issue Update

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# Background

- Historical studies show colophony (rosin) as a skin sensitizer - Karlberg.
- Classified as skin sensitizer on EU CLP Annex
  - All CASRNs
- Numerous tests – all show non-sensitizer
  - Oxidized rosin is sensitizer - Argued unsuccessfully as separate substance
- Filed lawsuit in EU - lost on basis of standing.
  - Parent companies would not go out of business if rosin industry shut down
- REACH dossier filed in 2010
  - Included all test data showing non-sensitizer but still classified according to Annex
  - Did not fight classification – lost opportunity
- Listing on CLP Annex is driving listing on other lists such as Stockholm County Phase-Out List

# Options Discussed & Dismissed

- Get rosin declassified
- Convince SIEF to split rosin registration
- Attempt another lawsuit since most industry are now stand along entities

# Option to Pursue

- Fight individual listing situations and publications as they come up
  - Monograph would serve as standard argument – Status?
  - May have limited success but would show our continued commitment to putting the scientific data in front of regulators and toxicologists

# Issues

- Have dealt with classification in EU for years with no significant impact.
  - ECHA recently talking about sensitizers as “equivalent concern”
- Inconsistency in classification/labeling outside of EU.
  - Hurts credibility of our industry “non-sensitizer” position
  - What is status of Morris/PCA board discussion on common industry position?

# Stockholm County List

- List compiled to make procurement decisions
- Reason for listing
  - Classified as skin sensitizer by ECHA;
  - Commonly used & easy to substitute
- Process for getting it removed from list
  - Compiling new list 2016-2020 and could review information-especially any change in classification or data
- **Action: Send letter (from PCA, HARRPA) along with Monograph.**