

PR&S Committee



Memorandum

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To: Henry Boswell** (Resinall), Ron deJong (Lawter), Mandi Edwards (Plasmine), Fred Gouzoules (Ingevity), Steve Green** (Eastman), Mario Green* (G-P), Ken Kennedy (Pinova-PCA Board), Amanda Stenson (Lawter), Dustin Melton (Arboris), Charles Morris (PCA President), Brenda Murray (Rennesenz), Dave Neely (Arboris), James Russell* (Consultant), Eric Searcy** (G-P), Conrad Shannon (Pinova) Sam Turetsky (G-P), Phil Ulichney (Plasmine) and Jenifer Whittington (Arizona)

*By teleconference

** Absent

From: N. E. Lawson

CC: Mathieu Rabarot (DRT), Sherry Keramidas (PCA)

Date: Nov. 06, 2015

Re: **PR&S Committee Meeting – Oct.22, 2015**

NOTE: NEXT PR&S TELECONF CALL: JAN. 27 at 10-11 AM.

NEXT COMMITTEE MEETING: ATLANTA, GA 8-NOON ON MARCH 17, 2016

INTRODUCTION

A regular meeting of the Product Regulatory & Stewardship Committee was held from 7:30 AM to 11:30 AM on Thursday, Oct. 22, 2015 at the Pinova facility in Brunswick, GA.

The meeting was followed by an excellent plant tour of the Pinova facility. A overview of the Pinova facility is attached. The Committee thanks Conrad and Brenda for arranging the excellent meals and tour. We appreciate all the care and efforts that went into it.

All presentation slides are attached.

Chairman (Fred Gouzoules) welcomed everyone, and the PCA Antitrust Statement was read. Introductions of all attendees were made. He reviewed the Past Action Plan (attached).

Charlie Morris said that this will be his last PR&S Committee meeting as he will be retiring at the end of the year. Charlie has been a strong supporter of our committee since he began his tenure, and we thank him and wish him well. The new PCA President will be Sherry Keramidas

who has a long history of guiding trade associations and has regulatory background. She will be relocating to St. Mary's, FL and will start Jan 1st. Charlie will remain active for about 6-12 months to provide overlap.

CTO BIOBASED FUELS IN EUROPE

Morris gave us a quick update on the situation. About 6-8 months ago legislation was passed declaring CTO as a biofuel candidate and the industry has been unsuccessful in changing this. Tax incentives are being revisited. A study to show that distilling CTO provides more jobs and net taxes to the governments than burning it or converting it to biodiesel is being prepared. Lawsuits are being considered to stop the double counting of incentives where CTO is considered to be a residue. Charlie said he is slightly positive that anything can be done.

SKIN SENSITIZATION (See Whittington and Lawson slides)

Lawson reported that the first draft of the Illing -Rodenburg monograph summarizing all that is known about pine chemicals and skin sensitization is done and is being reviewed by Steve Green and Mac McCallister. He will also review it and write the executive summary.

ACTION: Complete the monograph by the end of November.

The letter to Stockholm County will not be drafted until we can send along the monograph with it.

We agreed to try to respond to publications that have incorrect information concerning the purported skin sensitization of rosin and its derivatives. The recent article in the August issue of the journal "dermatologist": "A Review of Colophonium" will be the first.

ACTION: Lawson and Shannon to write a response

However, there was no agreement to do anything to change the classification of rosin as a skin sensitizer outside of Europe. PCA members (Ingevity, G-P, and Plasmine) do this for various reasons of consistency with European classification; others do not. This undercuts our efforts to show that rosin is NOT a skin sensitizer. Mandi Edwards said that Plasmine has not seen any significant concern from paper size customers about possible skin sensitization of their products that are now classified.

The PCA Board has not discussed this issue. Charlie Morris said that he thinks that the Board is waiting for a plan from those in their organizations and that it is "too fuzzy" now. They need to receive the monograph as part of this plan.

The long-term importance to rosin being incorrectly (to us) classified as a skin sensitizer is serious. Publications show up from time to time repeating this. More countries are mimicking Europe and classifying it. End-users (e.g. the automotive industry) are starting to take notice to avoid using substances on regulators lists. And perhaps most important: rosin derivatives that have no skin sensitization properties are being included with rosin because they have the word "rosin" in their name, so that all the rosin products fall under a cloud. Substances that are classified as skin sensitizers may eventually be considered as SVHCs in Europe (Substances of Very High Concern).

One way to deal with the issue is to get the classification of rosin changed and get it off the Annex. We could go back and claim that we were wrong in accepting the classification - a

"weight of evidence" argument. Could we go back and tell ECHA that we were wrong to accept the classification?

One approach discussed was getting the REACH dossier to re-classify rosin, which would allow companies to extend that SDS profile around the world and another might be to re-attempt to get rosin off the Annex through legal action. The open options led to the formation of the sub-team.

ACTION: A subcommittee of Lawter, Harima, Ingevity, G-P, and Arizona with coordination from Lawson was recommended to come up with a "game plan."

Lawson agreed to write a "one-pager" summarizing the issue for Ron deJong of Lawter to bring to their top management. Lawter is the Lead Registrant for rosin in Europe. Ron said that Lawter has recently hired a REACH specialist whom he will ask what can be done.

ACTION: Follow up with Lawter

HYDROGENATED ROSIN

Conrad Shannon reported that the Finnish CoRAP (Community Rolling Action Plan) experts have requested that tests be done on the mono-glycerol and mono_PE esters of hydrogenated rosin. These have been isolated and tests should be shortly completed.

ACTION: Follow up test results (Shannon/Lawson)

California Safer Consumers Products Regulation: Morris has contacted the leaders of the Green Chemistry Coalition (Dawn Koepke and John Ulrich) to see if they can help us remove the four HR substances from the Candidate Chemicals List. Lawson has requested help from Daren Kelland of Environment Canada for a specific citation to PBIT list that EC uses that is updated. Currently there is no direct citation (specific list, location, date, page etc.) and we might be able to convince DTSC to add a specific citation to a PBIT list where the HR substances aren't now included.

ACTION: Follow up with Koepke/Urich (Morris) and Environment Canada (Lawson)

ENVIRONMENT CANADA POLYMER APPROACH and UVCB IDENTITIES (See Lawson slides)

POLYMER APPROACH: None of the committee members has received any requests for help from Canadian importers.

ACTION: Lawson to ask Darren Kelland if they are getting any Section 71 submissions

UVCB: Lawson reported that there will be a ICG workshop/conference to discuss what EC is looking for and how to provide it. What does EC want? Is it the general information describing the substance that is already available from public REACH documents or the individual company data; in the latter case EC would need to get permission from each SIEF. Our derivative will have variable compositions - e.g. lightly and highly maleated rosin with the same CAS number. Will EC use "worse case results?"

ACTION: Lawson/Gouzoules to attend or participate in the workshop/conference.

CHEMICAL ABSTRACTS SERVICE POLICY ON UNILATERALLY ASSIGNING NEW REGISTRY NUMBERS (See Lawson slides)

Lawson reported that CAS claims not to do this unless part of a request. The representative asked for examples.

ACTION: Fred and Conrad to provide examples

POLYMER INVENTORY

We decided not to do an inventory at this time, since we could not define the need and the Committee has other higher priorities.

FOOD CONTACT PRESENTATION

Mandi Edwards provided the name of their consultant.

ACTION: Lawson will call him to see if he might make a general presentation at a future PR&S meeting for no or little cost.

OTHER

- Short discussion on whether members were using the H413 "Safety Net" classification on their MSDS.
- HARRPA is arranging a meeting with BP to discuss why they want to register the calcium salt of TOFA under REACH.
- **Action: Lawson to send link to the Illing summary of the IMO skin sensitization studies on CTO to Mario Green of G-P Chemicals.**
- It was suggested that we have a presentation by Robert Kiefer of REACH24 on the new Thailand regulations. **ACTION: Lawson to follow up with Kiefer**

NEXT COMMITTEE MEETINGS

- **Teleconference to review action items and new items, January 27, 2016, 10AM-11AM.**
- **Thursday, March 17, 2016, 8-noon, Atlanta, GA, guests of G-P Chemicals.**
- **Thursday, October 20, 2016, 8-noon, Jacksonville, FL, guests of Renessenz.**
- ***Dinners will precede the meetings on the previous evening.***