



# Hydrogenated Rosin & Derivatives

Pine Chemicals Association

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# EU Community Rolling Action Plan (CoRAP)

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## ■ How Did We Get Here?

- Two Rosin derivatives were included on the 2013 – 2015 CoRAP:
    - ◆ CAS 65997-13-9: RARA, hydrogenated, esters with glycerol
    - ◆ CAS 64365-17-9: RARA, hydrogenated, esters with pentaerythritol
  - After initial review authorities had concerns about suspected PBT/vPvB properties
  - Member state conducting the current substance evaluations is:
    - ◆ Finland – Turvallisuus – ja kemikaalivirasto (Tukes) /
      - > Finnish Safety and Chemicals Agency
  - Justification for Inclusion on CoRAP published: 03/26/2014
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# Justification Document

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## ■ Why Were We Targeted?

- Substances Are Not Readily Biodegradable – Suspected PBT/vPvB
  - High Exposure/Wide dispersive use
  - Exposure of environment
  - Consumer use
  - High (aggregated) tonnage
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- EChA - “It is not possible to conclude on the PBT-properties without more information on the constituents (e.g. hydrolyses testing, ready biodegradation testing, bioaccumulation testing on relevant constituents). Therefore, the substances are proposed for Substance Evaluation.”
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# Substance Evaluation

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- Member States evaluate substances to clarify whether their use poses a risk to human health or the environment.
  - Objective is to gather additional information from registrants of the substance to verify the suspected concern
  - Evaluation may conclude that risks are sufficiently controlled with measures in place. Otherwise, leads to a proposal of EU-wide risk management measures such as restrictions, identification of Substances of Very High Concern (SVHCs), harmonized classification or other actions outside the scope of REACH.
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# CoRAP

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- So What's Happened Since Our Last Meeting?
    - H4R delegation met with Finnish authorities.
    - Finns are concerned about potential lack of biodegradation of hydrogenated rosin *monoglyceryl* and *monopentaerythrityl* esters as components of GEHR and PEHR (Monoesters identified as substances of possible concern by EPIWEN QSAR model)
    - H4R has isolated the monoglyceride in order to test for biodegradation. Findings should be relevant to most rosin esters.
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## California Safer Consumer Products Act

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- Requires replacement of Priority Chemicals picked from the Candidate Chemicals List (CCL).
  - CAL Dept of Toxic Substances Control (DTSC) is encouraging replacement of any chemical on the CCL.
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# California Safer Consumer Products Act

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- DTSC continues move ahead with implementation
    - On 09/25/15 DTSC issued draft alternatives analysis guidance for consultation. Aims to help companies adopt safer alternatives to chemicals of concern in products designated under the SCPA.
    - Manufacturers of products designated as “priority products” must develop alternatives analysis (AAs). DTSC will use these to develop action plans for priority products. If manufacturers are unable or unwilling to develop the AAs, then responsibility falls to chemical distributors or end users if they intend to continue use.
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# California Safer Consumer Products Act

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- PCA Substances on the CCL:
    - CAS 65997-06-0: Rosin, hydrogenated
    - CAS 65997-13-9: RARA, hydrogenated, esters with glycerol
    - CAS 64365-17-9: RARA, hydrogenated, esters with pentaerythritol
    - CAS 68648-53-3: RARA, hydrogenated, esters with triethylene glycol
  
  - Why Were They Listed?
    - Lifted from Environment Canada's Chemical Management Plan – Phase 1 (The Challenge)
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# California Safer Consumer Products Act

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## ■ Where Are We?

- PCA tried unsuccessfully to informally get CAL DTSC to change the CCL.
  - PCA filed a formal petition to the State of California to remove hydrogenated rosin and its derivatives from the CCL (2015-01-28).
  - DTSC rejected the petition
  - Our attorneys submitted a Petition to Reconsider. Also rejected
  - Charlie Morris wrote letter to DTSC pointing out that removal of green products to be replaced by hydrocarbons is contrary to the intent of the law. Again, no response to date.
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# California Safer Consumer Products Act

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## ■ Next Steps?

- Try to enlist support from the California Green Chemicals Coalition to petition for removal
  - Contact Congressional Representatives to enlist support for removal from CCL
  - Conrad Shannon drafting white paper for use with legislators outlining extensive global clearances for products as direct and indirect food additives, ingredients in pharmaceutical applications and medical devices, and personal care and cosmetics applications. Paper will emphasize natural and renewable raw materials used in the manufacture of these products. DTSC responses to date are inconsistent with law's intent to promote the use of green chemistry in the state of California.
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# Conclusion

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Questions?

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