

ECHA PROPOSES A RESTRICTION ON CALCIUM CYANAMIDE¹

Summary²

The Annex XV report outlines a proposal to restrict the placing on the market of calcium cyanamide used as a fertiliser. Calcium cyanamide is a slow release nitrogen fertiliser available in granulated form and used for a number of EU agricultural crops. It is suitable to certain crops (e.g. cabbage, lettuce). Besides being a fertiliser, calcium cyanamide appears to have “secondary effects” helping plants to compete in stressed environment (e.g. clubroot infested soils), and helping to prevent plant diseases, pests (e.g. wireworm in potatoes). However, although apparently showing some herbicidal characteristics, calcium cyanamide is not approved for use in Plant Protection Products (PPPs) under Regulation (EC) No 1107/2009. Circa 130 000 tonnes of calcium cyanamide are manufactured annually in the EU of which about 53 000 tonnes are used in fertiliser production. The calcium cyanamide based fertilisers are supplied mainly to professional farmers and estimated to be used for fertilising about 230 000 hectares³ i.e. about 0.2% of the arable land in EU.

The Dossier Submitter has found that the use of calcium cyanamide as a fertiliser leads to a risk not adequately controlled for both surface water adjacent to fertilised fields and to soil. Based on the modelling, there does not appear to be a risk to human health from calcium cyanamide contaminated groundwater, although the quality of groundwater will be affected. However, recent findings suggesting that cyanamide may be designated as an endocrine disruptor for human health suggests this result may need to be re-evaluated. A derogation is proposed for the use of the granulated form of calcium cyanamide in a closed system⁴. The proposal includes a transitional period of 36 months recommended for the implementation of the restriction.

The public consultation on this proposed restriction will start on 25/09/2019 and ends on 25/03/2020. Respondents are urged to submit their comments early. The comments received before 20/11/2019 are planned to be discussed already in the committee meetings this year.

When responding to the public consultation, stakeholders should ensure that they are referring to the most recent version of the Annex XV report and any annexes (i.e. those published alongside the consultation).

Respondents are also encouraged to take into account when certain aspects of the proposal are planned to be discussed in the committee’s plenary meetings (see table below) and time their submissions accordingly (multiple submissions are possible throughout the consultation).

¹ The information note has been prepared based on the Annex XV report prepared by ECHA.

² An elaborated summary of the proposal is presented on pages 1 to 4 of the Annex XV report.

³ Assuming 300kg/ha use rate per hectare and taking an approximate amount of calcium cyanamide sold to be used as a fertiliser.

⁴ Closed system here means an agricultural system that does not result in emissions to the environment e.g. in a greenhouse without no releases of substances to the surrounding environment.

PUBLIC CONSULTATION

	Committee	
Plenary meeting of the Committee (timing)	Risk Assessment Committee (RAC)	Socio-Economic Assessment Committee (SEAC)
1 (~2 months after PC starts)	Verify the proposed scope. Conclude on hazard and hold preliminary discussion on exposure/risk.	Verify the proposed scope. Conclude on costs of the proposed restriction and hold preliminary discussions on its benefits.
2 (5.5 months after PC starts)	Conclude on exposure/risk and hold preliminary discussion derogations.	Conclude on benefits and hold preliminary discussions on proportionality and derogations.
3 (8.5 months after PC starts)	Finalise the derogations. Finalise the opinion plus justification text and adopt the final opinion.	Conclude on proportionality and derogations. Finalise the opinion plus justification text and agree the draft opinion.
4	Not relevant.	Conclude on issues raised during the SEAC draft opinion public consultation. Adopt the final opinion.

Information on the hazards of the substance(s) and the costs of the proposal would make the most impact if submitted by month two and exposure/risk, benefits and derogations by month four of the public consultation. This early submission would also allow the information to be considered at the appropriate time. This timing takes into account that stakeholders have access to the dossier much earlier than in the past, as it is published two weeks after submission or more than six weeks in advance of the start of the public consultation.

It is possible to submit more than one consultation response during the six month period so please take this into account when deciding when to submit information.

How to submit a comment in the Consultation on the proposed restriction

Firstly please read the consultation guidance that describes the relevant information that should be submitted. It is available here:

https://echa.europa.eu/documents/10162/13641/public_consultation_guidance_en.pdf/7c4705d5-ad01-43ed-a611-06f1426a595c.

When you are ready to make your comments, click on the appropriate link on the ECHA website. Please be aware that it is not possible to save your submission and come back to it, so you should already have your comments prepared in an attachment or saved in some other format in advance.

The web form contains five main parts:

- Introduction: containing some general information on the restriction and a link to this note and the PC guidance.
- Section 1: Personal information
- Section 2: Organisational information
- Section 3: Non-confidential comments on the proposal - both general comments and information on specific issues (see below). Your responses can be entered directly into the form or through section 4 as an attachment. However, please do not submit the same comments via both means. General comments can be on any aspect of the Annex XV restriction proposal, including on issues related to socio-economic analysis.
- Section 4: Non-confidential attachments can be added here.
- Section 5: Confidential attachments can be added here. Confidential information will only be available to the ECHA Secretariat, the Committees and Member State Competent Authorities. However, if ECHA receives an Access to Documents request, we may come back to you for justifications why the information is confidential. You can also add this information already in the relevant part of the webform.

Once you have finished your submission press the submit button and your comments will be submitted. You will receive a submission number via e-mail and you should refer to this in any communication with ECHA on this issue.

It is not possible for you to retrieve your submission so you may want to take a screen shot, or printed copy for your future reference.

Specific information requests

In addition to the general comments, outlined above, the consultation includes several specific questions to gather information that is considered to be particularly relevant to the evaluation of the proposal, as follows:

1. Hazard and risk assessment: Please provide any available data or literature references on all or any of the following:
 - a. environmental or human monitoring or biomonitoring data for calcium cyanamide and its degradation products (cyanamide, urea and dicyandiamide).
 - b. any available data on the fate and behaviour of calcium cyanamide and its degradation products (cyanamide, urea and dicyandiamide) in the aquatic (surface water and groundwater) and terrestrial
 - c. the residual concentration of these substances in locations where calcium cyanamide is used.
 - d. The potential risks of calcium cyanamide and its degradation products (cyanamide, urea and dicyandiamide) to birds, small mammals and bees
2. Application: The Annex XV report contains information on the application and conditions of use of calcium cyanamide. However, we would like to receive any additional relevant information on how calcium cyanamide is being applied. For example: for which crops and soils is it used, at what application rates (kg/ha), how often does it need to be

applied, what is the application method, how much time does it take to apply it to 1 hectare, etc.

3. Alternatives to the use of calcium cyanamide:
 - a. What are the most important characteristics (advantages/disadvantages) of calcium cyanamide fertilisers in comparison with other nitrogen fertilisers (e.g. slow-release or other types)?
 - b. Can calcium cyanamide be replaced by an alternative fertiliser alone, or does the alternative need to be complemented with additional other inputs (e.g. liming or plant protection products, etc.).
4. Economic impacts of the proposed restriction:
 - a. In case calcium cyanamide fertiliser was not available – how would the use of alternatives (e.g. alternative fertilisers and any additional inputs) impact cropping pattern, harvested amounts, application frequencies and costs, crop specific monetary results (yields) per hectare? Please, provide supporting justification.
 - b. How significantly would that affect economic results of a farm/certain crop sector (comparing to the current situation)? Please, provide supporting justification.
5. Environmental impacts of the proposed restriction: In case calcium cyanamide fertiliser was not available, how would the use of alternatives (e.g. alternative fertilisers and any additional inputs) impact overall environmental risks. Please, provide supporting justification.

The final opinions of both Committees are scheduled to be available by September 2020. ECHA will send the joint opinion of the Committees to the European Commission, which will take the decision whether to include the proposed restriction in Annex XVII of the REACH Regulation.

The Dossier Submitter and the Rapporteurs will all respond to the issues raised in the public consultation and these responses will be published with the launch of the consultation on the SEAC draft opinion in month nine of the process.