
ECHA Consultation on Cyanamide as a biocide in PT 3 and PT 18

Importance of Cyanamide

Due to swine dysentery, pigs secrete the pathogen *Brancyspira hyodysenteriae* in large quantities. The bacteria remain viable for several weeks (Chia and Taylor, 1978) and therefore pose a great risk to pigs and piglets. Pig farmers suffer from certain financial losses because dysentery can cause harmful or even lethal effects on the animals. In order to eliminate the pathogen *Brachyspira*, it requires a complete rehabilitation of pigsties in animal husbandry but also in manure. Otherwise, flies that develop contagious fertilizers become transmitters and infect the pigs of the next fattening period. Without treatment of manure with cyanamide there is little chance of interrupting the infection cycle.

Are there any substitutes for cyanamide?

At present, no other biocide is available to eliminate *Branchyspira* and its main vector, the stable fly, in manure. There is neither a suitable substitute nor an alternative method.

Cyanamide has proven to be an extremely effective tool in the sanitation of dysentery (Cadetg, 2019). Because cyanamide is a naturally occurring compound that is synthesized by different plant species (Kamo et al., 2009), soil microbial microbes are adapted to this compound and degraded to urea within days after application of the treated fertilizer. (Vilsmaier and Amberger, 1980).

Risks of the ban on Cyanamide

1. A ban on cyanamide as a biocide would increase the risk of an outbreak of swine dysentery and cause financial losses to pig farmers.
2. Dispensing with cyanamide treatment of infectious manure would increase the need for antibiotics, which is in contradiction to the EU Commission's target (EU Commission, 2015).
3. Cyanamid, however, not only helps to prevent the resistance of antibiotics to *Brachyspira*, but also to prevent the resistance of flies to insecticides as it reduces the frequency of larvicidal use and has a different mode of action than common larvicides.

Conclusion

Since there is no alternative or substitute for cyanamide, this biocide should remain available to pig farmers in order to avoid financial losses and resistance to *branchyspira* and flies. For these reasons, Stallprofi GmbH advocates the preservation of cyanamide as an important component of the successful collaboration with pig farmers.

Best regards

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