

## **EUROPEAN COMMISSION**

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs Consumer, Environmental and Health Technologies
Directorate-General for Environment
Circular Economy and Green Growth
Directors

Brussels, 24/11/2017 GROW/D1/EGJ/al grow.ddg1.d.1(2017)6262078

## NOTE FOR THE ATTENTION OF MR G. DANCET, EXECUTIVE DIRECTOR ECHA

Subject: Request to the European Chemicals Agency to prepare a restriction

proposal for the use of calcium cyanamide as a fertiliser, conforming

to the requirements of Annex XV to REACH

The SCHER opinion on "Potential risks to human health and the environment from the use of calcium cyanamide as fertiliser" raises serious concerns about the safe use of calcium cyanamide as a fertiliser. This fertiliser is listed in the Annex to Regulation (EC) No 2003/2003 as an EC fertiliser type and hence benefits from the free circulation in the Single Market.

Following a request by the Commission<sup>3</sup>, ECHA has carried-out a preliminary assessment regarding whether the use of calcium cyanamide as a fertiliser poses an unacceptable risk to human health or the environment. In its report ECHA confirms that the use of calcium cyanamide as a fertiliser could pose an unacceptable risk to the environment. A preliminary re-assessment made by ECHA of the risk characterisation for the aquatic environment made by SCHER, taking into account the PNEC values for cyanamide derived under the biocides legislation, suggests that risks would be identified in a greater number of scenarios, and would occur over a longer period of time, than initially estimated by SCHER.

In accordance with Article 69 (1) of the REACH Regulation, we would like to request ECHA to prepare an Annex XV restriction dossier to determine whether the use of calcium cyanamide as a fertiliser poses an unacceptable risk to the environment.

<sup>&</sup>lt;sup>1</sup> http://ec.europa.eu/health/scientific committees/environmental risks/docs/scher o 169.pdf

<sup>&</sup>lt;sup>2</sup> EC No. 205-861-8, CAS No. 156-62-7

<sup>&</sup>lt;sup>3</sup> https://echa.europa.eu/documents/10162/13641/calcium cyanamide request to echa.pdf/6ccd9451-52fd-abab-f9cd-04030ae2b19d

ECHA should prepare a short RMOA justifying that a restriction is the most appropriate regulatory measure. This conclusion will be published in the Public Activities Coordination Tool (PACT). Following this, ECHA shall enter the relevant intention into the Registry of Intentions (RoI). We would expect these two actions to be done no later than 1 month following the receipt of this letter.

Yours sincerely,

(e-signed)

Carlo Pettinelli DG Internal Market, Industry, Entrepreneurship and SMEs (e-signed)

Kestutis Sadauskas DG Environment