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| **2940** | **Date:** 2020/03/18 16:23  **Content:**  Hazard or exposure;  Environmental emissions;  Information on benefits  **Type:** Individual  **Country:**  Germany | **Comment:**  Calcium cyanamide is a slow-acting nitrogen fertilizer, with positive side effects. This includes its slow and therefore longer-lasting fertilizing effect. This avoids washing out into the groundwater and ensures, that the nutrient stays, where you want it: at the roots. Products, like lettuce have lower nitrate levels and are healthier.  Calcium cyanamide ist mainly used by professional users, who are trained in handling difficult substances. There are some safety instructions with regard to calcium cyanamide, that farmers have to consider. Farmers know how to handle difficult substances. A ban on the application for non-professional or untrained users should be checked.  Because of the already very strict requirements for the application of fertilizers, like distances to water, the risk of exposure from non-target areas become very low. Modern application technology will further increase the accuracy of the application and further reduce environmental emissions.  A great advantage of calcium cyanamide is its phytosanitary side effect to the soil. Harmful oranisms like wireworms can hardly be managed in any other way, e.g. in potato cultivation. Also the combination with fertilization of the pasture plus the phytosanitary effect is important for animal welfare reasons and help to reduce the need for medication of the animals.  Farmers have more than 100 years of positive experience with this fertilizer. |
| **Answer to specific info request 3:**  You have to add nitrification inhibitors to your nitrogen-fertilizer, e.g. dicyandiamid, with higher costs. |
| **Answer to specific info request 4:**  Due to poorer pasture hygiene, there will be higher costs for the veterinarian and medication against parasites.  Furthermore, economic losses due to inferior quality are to be expected. |
| **Answer to specific info request 5:**  If farmers don't use nitrification inhibitors, because of the higher costs, the risk of nitrogen leaching into the groundwater increases. |
| **Dossier submitter response:**  Thank you for your comment. In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to calcium cyanamide.  DS is aware of some cost savings and quality improvements due to the so-called secondary benefits. For further discussion on secondary benefits (e.g.reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4 on advantages of calcium cyanamide (including the secondary benefits).  On the chosen restriction option (RO), DS reminds that the BD describes the selection of the proposed RO. DS underlines that the other ROs would not remove the risk and some of them might be difficult to set in practise under REACH. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for the information. In the cost analysis, SEAC considered a decrease of crop yields (e.g. marketable crops) and possible additional use of approved PPPs in addition to N-fertilizer instead of calcium cyanamide secondary effects. SEAC took into consideration increase in costs due to the additional use of PPPs and nitrification inhibitors. |
| **2941** | **Date:** 2020/03/18 16:51  **Content:**  Hazard or exposure;  Environmental emissions;  Information on benefits  **Type:** BehalfOfAnOrganisation  **Org. type:** National NGO  **Org. name:** Bavarian farmers association  **Org. country:** Germany | **Comment:**  Calcium cyanamide is a slow-acting nitrogen fertilizer, with positive side effects. This includes its slow and therefore longer-lasting fertilizing effect. This avoids washing out into the groundwater and ensures, that the nutrient stays, where you want it: at the roots. Products, like lettuce have lower nitrate levels and are healthier.  Calcium cyanamide ist mainly used by professional users, who are trained in handling difficult substances. There are some safety instructions with regard to calcium cyanamide, that farmers have to consider. Farmers know how to handle difficult substances. A ban on the application for non-professional or untrained users should be checked.  Because of the already very strict requirements for the application of fertilizers, like distances to water, the risk of exposure from non-target areas become very low. Modern application technology will further increase the accuracy of the application and further reduce environmental emissions.  A great advantage of calcium cyanamide is its phytosanitary side effect to the soil. Harmful oranisms like wireworms can hardly be managed in any other way, e.g. in potato cultivation. Also the combination with fertilization of the pasture plus the phytosanitary effect is important for animal welfare reasons and help to reduce the need for medication of the animals.  Farmers have more than 100 years of positive experience with this fertilizer. |
| **Answer to specific info request 3:**  You have to add nitrification inhibitors to your nitrogen-fertilizer, e.g. dicyandiamid, with higher costs. |
| **Answer to specific info request 4:**  Due to poorer pasture hygiene, there will be higher costs for the veterinarian and medication against parasites.  Furthermore, economic losses due to inferior quality are to be expected. |
| **Answer to specific info request 5:**  If farmers don't use nitrification inhibitors, because of the higher costs, the risk of nitrogen leaching into the groundwater increases. |
| **Dossier submitter response:**  Thank you for your comment. Please, see the DS response to the comment # 2940. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  SEAC agrees with the DS response. |
| **2942** | **Date:** 2020/03/18 17:30  **Content:**  Information on benefits  **Type:** Individual  **Country:**  Italy  **Attachment:**  <redacted> | **Comment:**  La calciocianammide è un fertilizzante impiegato da un tempo immemorabile ed è probabilmente il primo tra i primi concimi “a lenta cessione” in grado di esercitare un’azione (moderna) importante sulla fertilità del terreno. Il concime è a base di azoto con molteplici capacità, è un prodotto particolare e molto efficace; di seguito alcune delle caratteristiche ampiamente riportate in bibliografia derivanti sia da ricerche sperimentali che da osservazioni pratiche.    - minore lisciviazione dei nitrati rispetto ad altri concimi azotati  - migliore efficienza di altri concimi azotati e non, minerali od organici, laddove questi vengano impiegati con la calciocianammide  - gli ortaggi da foglia possono contare su di una maggiore qualità per una minore presenza di nitrati quando viene impiegata la calciocianamide |
| **Answer to specific info request 2:**  riso, orticole di pieno campo e serra, frutticole altro;  Viene applicata su tutti i tipi di terreno  Viene distribuita 1 volta per anno  La dose varia da 250 a 400 kg/ha a seconda della coltura  La distribuzione è fatta a pieno campo ed il tempo richiesto è di 25-30 minuti ettaro |
| **Answer to specific info request 3:**  a) il calcio e ed il particolare tipo di azoto a lento effetto che consente di limitarne le perdite diminuendo l’inquinamento  b) no non è possibile perchè è l’unico prodotto a base di azoto cianammidico. |
| **Answer to specific info request 4:**  a) la non possibilità di utilizzo della calciocianamide porterebbe alla mancanza di un prodotto fondamentale e soprattutto non sostituibile per chi ha necessità assoluta di aumentare la qualità delle sue produzioni per garantirsi la redditività necessaria. |
| **Answer to specific info request 5:**  l’uso della calciocianamide riduce le perdite di azoto per lisciviazione. Diverse pubblicazioni scientifiche, disponibili in letteratura, dimostrano ampiamente questo aspetto e l‘efficenza della diciandiammide come inibitore della nitrificazione. Altri inibitori della nitrificazione disponibili non sono in grado di garantire gli stessi risultati. |
| **Dossier submitter response:**  Thank you for your comment. In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g. reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4 on advantages of calcium cyanamide (including the secondary benefits). The restriction dossier is concerned on environmental effects of calcium cyanamide use on soil organisms and on releases from a field, however, the DS acknowledges the importance for growers to get an economic return from their fields.  Grazie per aver presentato le vostre osservazioni. Per quanto riguarda le basse emissioni di azoto della calciocianamide e la riduzione della lisciviazione dell'azoto, si veda la risposta generale DS3 sulle alternative alla calciocianamide.  Per quanto riguarda i cosiddetti benefici secondari (ad esempio, il ridotto accumulo di nitrati nelle piante, l'eliminazione dei parassiti, la repressione delle malattie fungine) e l'effetto benefico dell’idrossido di calcio sulle piante e sul suolo, si rimanda alla risposta generale DS4 sui vantaggi della calciocianamide (compresi i benefici secondari). Il fascicolo di restrizione riguarda gli effetti ambientali della calciocianamide sugli organismi del suolo e le emissioni sul suolo. Tuttavia il DS riconosce l'importanza per i coltivatori di ottenere un ritorno economico dalle loro coltivazioni. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for information. In the cost analysis SEAC considered a decrease in crop yields (e.g. marketable crops) and possible additional use of approved PPPs in addition to N-fertilizer instead of calcium cyanamide secondary effects. |
| **2943** | **Date:** 2020/03/19 14:23  **Content:**  Scope or restriction option analysis;  Hazard or exposure;  Environmental emissions;  Baseline;  Description of analytical methods;  Information on alternatives;  Information on benefits  **Type:** BehalfOfAnOrganisation  **Org. type:** National NGO  **Org. name:** <redacted>  **Org. country:** Germany  **Company name confidential:** Yes  **Attachment:** | **Comment:**  <redacted> therefore requests a scientific and well balanced evaluation of pros and cons of the use of fertilizers and other farm inputs to enable a sustainable production of crops, food, and commodities. |
| **Dossier submitter response:**  Thank you for your comment. DS underlines that the other ROs assessed would not remove the risk (e.g. to soil organisms) and some of them might be difficult to set in practise under REACH. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for your response. |
| **2944** | **Date:** 2020/03/19 17:47  **Content:**  Hazard or exposure;  Information on alternatives  **Type:** BehalfOfAnOrganisation  **Org. type:** Company  **Org. name:** AlzChem Trostberg GmbH  **Org. country:** Germany  **Attachment:** | **Comment:**  Conclusion of attached paper:  The current risk to surface water organisms in the EU due to urea applied directly as fertiliser is 1,600 times higher than due to the amount of urea released from calcium cyanamide.  This leads to the following issues:  1. The Dossier Submitter invested a lot of time and capacity in the risk assessment of urea as a secondary metabolite of calcium cyanamide. We do not understand why the Dossier Submitter failed to carry out a risk assessment for urea fertiliser as such.  2. The proposed restriction for calcium cyanamide as fertiliser appears highly disproportionate given that it removes just 0.06 % of the risk of urea to aquatic organisms, while not taking into account the remaining 99.94 % of the risk from urea fertiliser.  3. The fact that urea is the most important nitrogen fertiliser in the world raises considerable doubts as to whether the method for risk assessment chosen by the Dossier Submitter is generally suitable for fertilisers as it obviously overemphasizes the risk to surface water organisms.  For details see attached file |
| **Dossier submitter response:**  Thank you for your comment. The DS has prepared the dossier in response to the concern on environmental risks of calcium cyanamide. The dossier states that there are several alternative fertilisers available on the EU market and in broad use by farmers. The dossier is constructed according to REACH guidelines, and risks of potential alternatives are not studied to the same extent as the substance proposed to be restricted. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for the information. |
| **2945** | **Date:** 2020/03/19 18:31  **Content:**  Information on benefits  **Type:** BehalfOfAnOrganisation  **Org. type:** Company  **Org. name:** Agrigiesse srl  **Org. country:** Italy  **Attachment:** | **Comment:**  AGRIGIESSE è una società che opera in tutta Italia nel settore dei mezzi tecnici per l’agricoltura. Ciò attraverso i suoi soci dott. agronomi con esperienza ventennale nel settore della nutrizione delle colture orticole, frutticole e intensive.  Il nostro gruppo frequentemente consiglia nei piani di concimazione la calciocianamide. Questo è un prodotto molto importante per il produttore agricolo moderno che ha sempre maggiore necessità di avere un buon equilibrio vegeto produttivo delle sue coltivazioni.  La calciocianamide è stato il primo fertilizzante azotato artificiale prodotto industrialmente. Contiene circa il 20% di azoto e il 50% di calcio ed è un modo ecologicamente favorevole di fornire questi nutrienti per le colture in campo e protette. Le proprietà di questo fertilizzante riguardano un rilascio graduale di azoto, quindi la rizosfera rimane in armonia con le esigenze delle radici delle piante; la lisciviazione e la demineralizzazione sono minime, di conseguenza l'inquinamento da nitrati è limitato; la combinazione di azoto e calcio aumenta l'efficienza delle applicazioni di fertilizzanti riducendo l'impronta di carbonio delle operazioni agricole, aumentando allo stesso tempo la resa e la qualità delle colture; la salute del suolo è migliorata dall'aumento della diversità microbica e questo aiuta a sopprimere gli effetti dei patogeni presenti nel suolo. L'uso della calciocianamide è inserito nel contesto delle esigenze di aumento della produzione alimentare, riducendo l'intensità con cui vengono utilizzate le risorse, migliorando la biodiversità naturale e garantendo la sostenibilità ambientale (Dixon, G.R. (2012). CALCIUM CYANAMIDE - A SYNOPTIC REVIEW OF AN ENVIRONMENTALLY BENIGN FERTILISER WHICH ENHANCES SOIL HEALTH. Acta Hortic. 938, 211-217).  La calciocianamide (CaCN2) è un concime azotato a lenta cessione sintetizzato nel 1895 da Adolph Frank e Nidodem Caro e da circa un secolo è impiegato largamente nei Paesi dell’Unione Europea.  La sua produzione industriale avviene in tre fasi e utilizza materie prime a basso costo quali pietra calcarea, carbone e azoto atmosferico. La prima fase prevede l’ottenimento della calce viva (ossido di calcio) dalla pietra calcarea che viene finemente macinata e portata ad elevatissime temperature; nella seconda fase viene prodotto il carburo di calcio per reazione dell’ossido di calcio col carbone (normalmente antracite) in forni di carburazione; nella terza ed ultima fase si ottiene calciocianamide (CaCN2) per reazione del carburo di calcio con l’azoto atmosferico in forni rotanti di azotazione.  La calciocianamide è un concime semplice azotato regolarmente inserito nelle normative che disciplinano il settore messo a punto più di 100 anni fa come primo concime azotato e costituisce ancora oggi il riferimento nell’ambito dei fertilizzanti speciali. In questi anni di assistenza tecnica è stato possibile notare che l’azoto messo a disposizione dalla calciocianamide alle piante riesce ad essere particolarmente efficiente anche nei terreni più difficili come quelli sciolti o quelli più poveri permettendo il raggiungimento di produzioni lorde vendibili più elevate per il produttore agricolo. Questo è particolarmente evidente nelle zone di produzione orticole del sud Italia (ad esempio Vittoria, Comiso, Licata, Pachino in Sicilia per gli ortaggi in serra, la provincia di Foggia per pomodoro da industria, per le brassicacee, per l’asparago e per il carciofo, Tropea per la pregiata cipolla, la zona di Fondi e più in generale la Campania) e nelle zone risicole del nord Italia: in entrambi i casi la gestione dell’azoto è importante ma decisamente problematica. In particolar modo nelle aree di produzione del riso la calciocianamide è un prodotto fondamentale e difficilmente sostituibile. Basti pensare che circa il 15-20% della superficie risicola italiana è concimata con calciocianamide (2.5-3 q/ettaro in presemina) proprio in virtù dei migliori risultati produttivi ottenibili con l’azoto ed il calcio della calciocianamide; la sua non disponibilità potrebbe avere un impatto economico importante su tutta la filiera produttiva (Romani – 2003. Impiego in risaia sommersa di concimi a lenta trasformazione. L’Informatore Agrario, 19: 31-37). (cfr allegato 1)    Inoltre, una piccola parte della cianamide si trasforma in diciandiammide.  La diciandiammide, sostanza anch’essa regolarmente inserita nelle normative di riferimento come inibitore della nitrificazione, è la molecola che rallenta la disponibilità dell’azoto. Questo rallentamento consente il mantenimento dell’azoto sotto forma ammoniacale per un tempo prolungato, permettendo di ottenere una maggiore efficienza di utilizzazione delle unità di azoto fornite con la concimazione perchè vengono contenute notevolmente le perdite di azoto per dilavamento dei nitrati. L’azione della diciandiammide oltre che nelle sopraelencate colture, è particolarmente apprezzata da tutti i produttori di ortaggi a foglia per la sua capacità di evitare accumuli di nitrati nelle parti eduli della pianta (Pietro Santamaria et alii – 2016 - Calcium Cyanamide Effects on Nitrogen Use Efficiency, Yield, Nitrates, and Dry Matter Content of Lettuce - Soil Fertility & Crop Nutrition). (cfr. allegato 2)  Recenti ricerche effettuate con centri di ricerca italiani - tra cui anche Sele Agroresearch Srl (Eboli – SA) - hanno dimostrato che la Calciocianamide applicata su Pomodoro da industria conserva le ottime caratteristiche nutrizionali anche a dosaggi ettaro minimi di 2-5 qli/ha producendo incrementi produttivi. Inoltre, l’elevata disponibilità di calcio assimilabile fornito dall’inizio del trapianto o nelle prime fasi contribuisce alla robustezza dell’apparato radicale e previene la fisiopatia del marciume apicale del frutto del pomodoro (blossom end rot - BER). (cfr. allegato 3)  Numerosi lavori sono stati effettuati anche su uva da tavola da cui è risultato che l’uso di calciocianamide a confronto con altre forme di azoto e calcio ha prodotto un miglioramento del germogliamento della vite; una maggiore produzione ettaro; un maggiore peso della bacca e del grappolo; un aumento del contenuto degli zuccheri e un miglioramento qualitativo generale del raccolto. (Colapietra M:- M. Spagnuolo - S. Moscelli - G.Ferrara - G. Cacucci (2011) - Distribuzione di azoto e calcio sull’uva da tavola Italia per un più alto standard quali-quantitativo - Frutticoltura 1-2.) (cfr.allegato 4)  Per quanto sopra riportato ed evidenziando che il prodotto in oggetto è molto importante per la produzione di diverse specie vegetali, auspichiamo che la calciocianamide non sia soggetta a restrizioni di alcun tipo perché ciò costituirebbe un grave danno per gli agricoltori che verrebbero privati di uno strumento di produzione fondamentale con conseguenti notevoli ripercussioni economiche su tutto il settore. È importante infine sottolineare che una restrizione della calciocianamide potrebbe avere effetti negativi anche sull’ambiente poiché verrebbe a mancare un prodotto in grado di ridurre le perdite di azoto per lisciviazione. |
| **Answer to specific info request 1:**  vedi sezione III - commenti non riservati |
| **Answer to specific info request 2:**  vedi sezione III - commenti non riservati |
| **Answer to specific info request 3:**  vedi sezione III - commenti non riservati |
| **Answer to specific info request 4:**  vedi sezione III - commenti non riservati |
| **Answer to specific info request 5:**  vedi sezione III - commenti non riservati |
| **Dossier submitter response:**  Thank you for your comment. Secondary benefit aspects have been discussed in the original dossier. This comment provides useful scientific information on NO3 accumulation in lettuce leaves. In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g. reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4.  The restriction dossier is concerned on environmental effects of CaCN2 use on soil organisms and on releases from a field, however, the DS acknowledges the importance for growers to get an economic return from their fields.  Grazie per aver presentato le vostre osservazioni. Gli aspetti relativi ai benefici secondari sono stati discussi nel fascicolo di restrizione. Le vostre osservazioni forniscono utili informazioni scientifiche sull'accumulo di NO3 sulle foglie di lattuga. Per quanto riguarda le basse emissioni di azoto della calciocianamide e la riduzione della lisciviazione dell'azoto, si veda la risposta generale DS3 sulle alternative alla calciocianamide.  Per quanto riguarda i cosiddetti benefici secondari (ad esempio, l'accumulo ridotto di nitrati nelle piante, l'eliminazione dei parassiti, la repressione delle malattie fungine) e l'effetto benefico dell’idrossido di calcio sulle piante e sul suolo, si rimanda alla risposta generale DS4.  Il fascicolo relativo alla restrizione è preoccupato per gli effetti ambientali dell'uso di CaN2 su organismi del suolo e per i rilasci sui terreni, tuttavia il DS riconosce l'importanza per i coltivatori di ottenere un ritorno economico dalle loro coltivazioni. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for your comment. In the cost analysis SEAC noted a decrease in crop yields (e.g. marketable crops) and possible additional use of approved PPPs in addition to N-fertilizer instead of calcium cyanamide secondary effects. |
| **2946** | **Date:** 2020/03/19 20:03  **Content:**  Information on benefits  **Type:** BehalfOfAnOrganisation  **Org. type:** Company  **Org. name:** Societa Cooperativa ANCEO GROTTAGLIE  **Org. country:** Italy | **Comment:**  La Societa Cooperativa ANCEO GROTTAGLIE è una cooperativa di produttori di Uva da Tavola che opera ormai da molti annie che associa le più importanti aziende di produzione della provincia di Taranto in Puglia. la cooperativa ANCEO da sempre attenta ai disciplinari di produzione integrata e certificata Globalgap - a mezzo del suo Presidente - ritiene di esprimere un suo parere positivo per l’uso della calciocianamide che da anni è ormai entrata con successo nelle pratiche di concimazione per l’uva da tavola di qualità.  Fra tutte le pratiche agronomiche, la somministrazione di concimi azotati in dosi ottimali, induce gli incrementi produttivi ed una buona qualità delle produzioni. L’azoto aumenta la vigoria della pianta ed entra nella costituzione della clorofilla, delle proteine, degli acidi nucleici e delle vitamine. Una eccessiva vigoria può provocare lo scadimento della qualità dell’uva da tavola. In particolare: diminuzione del contenuto di zuccheri e dei composti polifenolici nobili, ritardo della maturazione, maggiore predisposizione della pianta all’attacco da parte di parassiti.  L’azoto della Calciocianamide è disponibile per le piante in funzione del loro fabbisogno, evitando queste problematiche e favorendo un ideale equilibrio fra fase vegetativa e quella riproduttiva.  L’azoto della Calciocianamide in buona parte non è disponibile per le piante immediatamente. Soltanto dopo un percorso di trasformazioni si forma l’azoto ammoniacale. In seguito al processo di nitrificazione si ottiene l’azoto nitrico. Questo processo è rallentato, rispetto alla maggioranza degli altri concimi azotati, dall’azione della diciandiammide che riduce per un periodo ideale l’attività dei batteri responsabili della prima parte del processo di nitrificazione dell’ammonio. Rispetto al nitrato, molto mobile nella soluzione circolante, l’ammonio fissato ai colloidi del terreno è meno soggetto al fenomeno della lisciviazione (dilavamento). Tutto l’azoto della Calciocianamide resta disponibile per un periodo più lungo e può essere assunto dalle piante a secondo del loro fabbisogno nelle varie fasi fenologiche. La Calciocianamide, rispetto ad altri concimi, accelera la decomposizione dei residui vegetali della vite (foglie, materiale asportato con la potatura) con minore possibilità di infezioni causati da parassiti fungini.  Il calcio svolge delle funzioni importanti sia nel terreno che nelle piante. Il calcio ottimizza la struttura glomerulare del terreno. È contenuto normalmente in grande quantità nei terreni e nelle acque, purtroppo spesso in forma insolubile e, quindi, poco disponibile per le piante.  Il calcio è asportato dalla vite in grande quantità, superiori al potassio e agli altri elementi nutritivi. La carenza di calcio determina clorosi internervale e marginale delle foglie e successive necrosi, formazione di bollosità e presenza di foglie di colore giallo. Ciò provoca la morte degli apici vegetativi e il disseccamento del rachide. Eccessi di calcio assimilabile possono essere una delle cause della clorosi ferrica. La disponibilità del calcio in linea alle esigenze delle piante aumenta la consistenza e la resistenza dell’acino agli attacchi parassitari. Migliora l’uniformità della colorazione del grappolo, lo sviluppo delle bacche e la produttività della pianta. Il calcio favorisce il raggiungimento delle migliori caratteristiche organolettiche (sapore, contenuto di zuccheri, aromi, ecc.) e consente la formazione di uva più croccante. Aumentando la resistenza allo schiacciamento, incrementa la resistenza dei grappoli e degli acini al trasporto e alla frigoconservazione.  La “Calciocianamide” oltre all’azoto contiene anche il calcio, un macroelemento importante per la nutrizione della vite per la produzione di uva da tavola. La formulazione granulare della Calciocianamide Perlka®, consigliata per i vigneti, contiene il 50% di calcio (CaO). Quasi la metà del calcio è idrosolubile, pronta per l’assorbimento dall’apparato radicale delle piante. La Calciocianamide mette a disposizione il calcio allo stato ionico facilmente assimilabile a beneficio della produttività e della qualità del raccolto. Evita inoltre un eccessivo compattamento del terreno e contribuisce a creare un ambiente poco adatto all’insediamento di funghi patogeni.  Per ottenere i benefici sopradescritti dall’uso della calciocianamide ormai da diversi anni i coltivatori di uva da tavola applicano il prodotto localizzato tra le file a dosi di 2 – 3 qli/ha o distribuito a spaglio su tutta la superficie a dosi di 4 qli/ha. Ciò consente di massimizzare gli apporti di azoto e calcio riducendone l’impatto economico.  Per quanto sopra riportato ed evidenziando che la calciocianamide è molto importante per la produzione di uva da tavola di qualità, auspichiamo che la calciocianamide non sia soggetta a restrizioni di alcun tipo perché ciò costituirebbe un grave danno per gli agricoltori che verrebbero privati di uno strumento di produzione fondamentale con conseguenti notevoli ripercussioni economiche su tutto il settore. È importante infine sottolineare che una restrizione della calciocianamide potrebbe avere effetti negativi anche sull’ambiente poiché verrebbe a mancare un prodotto in grado di ridurre le perdite di azoto per lisciviazione. |
| **Answer to specific info request 2:**  SEZIONE III. Commenti non riservati |
| **Answer to specific info request 3:**  SEZIONE III. Commenti non riservati |
| **Answer to specific info request 4:**  SEZIONE III. Commenti non riservati |
| **Answer to specific info request 5:**  SEZIONE III. Commenti non riservati |
| **Dossier submitter response:**  Thank you for your comment. These aspects have been discussed in the original dossier. In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g. reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4.  The restriction dossier is concerned on environmental effects of calcium cyanamide use on soil and aquatic organisms. However, the DS acknowledges the importance for growers to get an economic return from their fields.  Grazie per aver presentato le vostre osservazioni. Questi aspetti sono stati discussi nel fascicolo di restrizione. Per quanto riguarda le basse emissioni di azoto della calciocianamide e la riduzione della lisciviazione dell'azoto, si veda la risposta generale DS3 sulle alternative alla calciocianamide.  Per quanto riguarda i cosiddetti benefici secondari (ad esempio, l'accumulo ridotto di nitrati nelle piante, l'eliminazione dei parassiti, la repressione delle malattie fungine) e l'effetto benefico del Ca(OH)2 sulle piante e sul suolo, si rimanda alla risposta generale DS4.  Il fascicolo di restrizione riguarda gli effetti ambientali dell'uso della calciocianamide per quanto riguarda il suolo e gli organismi acquatici. Tuttavia, il DS riconosce l'importanza per i coltivatori di ottenere un ritorno economico dai loro campi. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for the information. In the cost analysis SEAC considered a decrease in crop yields. |
| **2947** | **Date:** 2020/03/20 14:13  **Content:**  Information on benefits  **Type:** BehalfOfAnOrganisation  **Org. type:** Company  **Org. name:** Sele Agroresearch Srl – Eboli – SA  **Org. country:** Italy  **Attachment:** | **Comment:**  La coltivazione del pomodoro da industria tutt’oggi riveste ancora un elevata importanza per il comparto agricolo. Infatti, nonostante le difficoltà per la coltivazione (avversità climatiche, problematiche legate alla gestione, etc), la concorrenza del prodotto estero, gli elevati costi di produzione, c’è ancora una forte richiesta da parte dell’industria conserviera di pomodori con elevati standard qualitativi.  Un valido strumento per prodizioni di pomodoro di qualità è la calciocianamide.  La calciocianamide è molto di più di un semplice concime granulare. Le sue caratteristiche lo rendono un prodotto speciale, utilizzato a livello europeo da più di un secolo. La distribuzione del prodotto sul terreno avviene con comuni spandiconcimi cui segue l’interramento mediante frangizollatura, o meglio, fresatura.  La calciocianamide si presenta sotto forma di granulo di colore nero composto da 19,8 % di azoto totale e >50% di calcio.  La maggior parte dell’azoto rilasciata dalla calciocianamide è lentamente disponibile per le piante. Le due forme di azoto (ammoniacale e nitrico) possono essere utilizzate entrambe, a seconda delle colture, favorevolmente dalle piante attraverso il loro apparato radicale.  Inoltre, va ricordato l’elevata disponibilità di calcio prontamente assimilabile dalle radici. Questo elemento è contenuto normalmente in grande quantità nei terreni e nelle acque, ma molto spesso in forma insolubile e, quindi, disponibile alle piante in modo molto limitato.  Nel corso degli ultimi due anni sono state effettuate alcune prove in tutt’Italia di applicazione della calciocianamide su pomodoro da industria. Le applicazioni sono state fatte a differenti dosaggi in pre-trapianto e alla rincalzatura.  Ciò, allo scopo di valutarne gli effetti quali-quantitativi (resa, qualità dei frutti, ecc) e il corretto sviluppo vegetativo della pianta.  I risultati ottenuti hanno confermato gli ottimi effetti positivi dell’applicazione di calciocianamide su pomodoro da industria.  Si allega il rapporto di prova nella “SECTION IV. Non-confidential attachment” |
| **Answer to specific info request 1:**  SEZIONE IV. Allegato non riservato |
| **Answer to specific info request 2:**  SEZIONE IV. Allegato non riservato |
| **Answer to specific info request 3:**  SEZIONE IV. Allegato non riservato |
| **Answer to specific info request 4:**  SEZIONE IV. Allegato non riservato |
| **Answer to specific info request 5:**  SEZIONE IV. Allegato non riservato |
| **Dossier submitter response:**  Thank you for your comment. These aspects have been discussed in the original dossier. In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g. reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4.  Grazie per aver presentato le vostre osservazioni. Questi aspetti sono stati discussi nel fascicolo di restrizione. Per quanto riguarda le basse emissioni di azoto della calciocianamide e la riduzione della lisciviazione dell'azoto, si veda la risposta generale DS3 sulle alternative alla calciocianamide.  Per quanto riguarda i cosiddetti benefici secondari (ad esempio, l'accumulo ridotto di nitrati nelle piante, l'eliminazione dei parassiti, la repressione delle malattie fungine) e l'effetto benefico del Ca(OH)2 sulle piante e sul suolo, si rimanda alla risposta generale DS4. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for your comment. In the cost analysis SEAC considered a decrease in crop yields. |
| **2948** | **Date:** 2020/03/20 20:58  **Content:**  Other socio economic analysis (SEA) issues  **Type:** Individual  **Country:**  Poland | **Comment:**  In my profession as a technical crop adviser working in the field of vegetable production for more than 20 years, I want to submit a comment to the restriction proposal. I neither can understand the reasons for such a restriction nor see any benefit for the environment. However, what I can foresee is that a ban of this fertiliser will affect the profitability of the vegetable production on many farms. It may even force some farms to quit as their soils may lose their productivity for vegetables.  Let me explain our concerns with the example of out-door tomatoes grown in Poland. The actual development (Corona-virus) underlines the importance of regional produce. Although the climate in Italy may be more favourable for growing tomatoes, the local production in Poland increased in recent years. Consumers prefer local fresh produce, which has not been carried on a truck for several days before it reaches the supermarket. In addition growing such crops locally offers a chance to generate additional income and to diversify crop rotations.  Calcium cyanamide has become a favoured nitrogen fertiliser for open-field tomatoes in Poland. The application is 300 to 500 kg/ha incorporated into the soil of the planting rows about ten days before planting. To our growers experience calcium cyanamide is the ideal source of nitrogen for tomatoes. As the crop is standing from May to October and shall bear fruits from July to October it needs a source of nitrogen which supports an even and steady uptake by the plants. Calcium cyanamide fertiliser increases the uptake of ammonium nitrogen and reduces the uptake nitrate. This kind of nutrition promotes the development of a strong root system with many fine roots as the root has to grow actively to the ammonium nitrogen, which is adsorbed to the clay minerals of the soil. By the way the plants get a better access to the soil’s nutrients such as phosphorous and calcium. A major problem in the production of out-door tomatoes is the blossom end-rot. This is not a disease caused by a pathogen but disease caused by calcium deficiency. Tomatoes showing symptoms of blossom end-rot cannot be sold any more. Fertilising the tomatoes with calcium cyanamide from our experience is the ideal way to prevent this nutritional problem and to produce a higher percentage of marketable fruits. As tomatoes are a crop with a high turnover per hectare, the use of calcium cyanamide fertiliser is highly profitable for the growers. Losing this fertiliser will make it very difficult for the growers to maintain the productivity of their soils and the profitability of the open-field tomato production.  As tomatoes usually are produced in vegetable farms, our growers use this product successfully also in other vegetable crops. Many growers of cabbage, cauliflowers and other brassica-vegetables achieved high increases in marketable yield and profitability after they switched from conventional nitrogen fertilisers to calcium cyanamide. The yield increase is not the same everywhere but extraordinary on some farms with specific soils. Those farms depend on the availability of calcium cyanamide fertiliser. Otherwise, they may have to go out of the business, as the vegetable production will not generate a sufficient income anymore.  Rgds, Jacek Ceglarski |
| **Dossier submitter response:**  Thank you for your comment. These aspects have been mostly discussed in the original dossier. However, DS notes tomato production-specific information which was not discussed in the original dossier.  In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g. reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for your comment. In the cost analysis SEAC took into consideration a decrease in crop yields (e.g. marketable crops) and possible additional use of approved PPPs in addition to N-fertilizer instead of calcium cyanamide secondary effects. |
| **2949** | **Date:** 2020/03/21 22:45  **Content:**  Scope or restriction option analysis;  Hazard or exposure;  Environmental emissions;  Baseline  **Type:** Individual  **Country:**  Poland | **Comment:**  Comment to Annex XV-Report of ECHA on Calcium cyanamide  I am working as an adviser and grower of a private advisory service. We are growing strawberries, raspberries and blueberries in Poland on about 100 000 ha. Calcium cyanamide has been introduced as a fertilizer for these crops in Poland several years ago. We estimate that it is used in these crops on an acreage of 10 000-20 000 ha. The use of calcium cyanamide Perlka is increasing steadily as the growers observed significant advantages compared to the use of standard nitrogen fertilizers. The combination of plant-available ammonium nitrogen stabilized by the DCD and the release of plant-available calcium ions has proved to be ideal plant nutrition for this kind of fruits. Avoiding high nitrate contents in soil and plants leads to an even growth resulting in resilient crops, which are less susceptible to fungal diseases. This reduces the need for fungal spray applications and helps to meet the requirements of the supermarkets (very strict limit values for residues of plant protection products). Growers further observed that the crops remain productive for longer and in this way the use of this fertilizer helps to reduce the costs for replanting. Another important advantage is the better fruit quality achieved through combined nutrition with nitrogen and calcium. The latter often is in the minimum and calcium uptake is difficult to achieve with foliar applications. Calcium deficiency is limiting the shelf life of the harvested fruits and we observed a better shelf life of the berries after the harvest when the nitrogen fertilization was applied with calcium cyanamide Perlka.  We never made any observations of environmental problems caused by the use of this fertilizer. On the contrary, due to its high content of alkaline ingredients (50 % CaO) it prevents soil acidification, improves the soil structure and in this way counteracts soil silting, surface run-off and soil erosion. Furthermore, its retarded nitrification reduces the risk of nitrate leaching remarkably. Thus, in contradiction to the Restriction Report we believe that calcium cyanamide fertilizer is even more benign to the environment than alternative fertilizers like urea (ammonia volatilization, nitrate leaching), CAN (nitrate leaching, nitrous oxide emissions) and coated slow-release fertilizers (microplastics).  There is no other fertilizer, which can substitute the use of calcium cyanamide equivalently. The proposed ban of calcium cyanamide as fertiliser would cause a series of disadvantages and significantly affect the profitability of the berry production in Poland:  • Lower yields, in a particular the lower percentage of class 1 produce  • Faster aging of the cultures (senescens), higher costs for replanting  • Increasing demand for plant protection applications due to weakened plants  • Increasing demand for foliar applications of calcium  • Increasing labour demand for foliar applications of calcium and plant protection products  We cannot understand the proposed ban of calcium cyanamide as we cannot see any environmental advantage from the use of alternative fertilizers. Even ECHA admits this in their report. Thus, we strongly recommend to reconsider or to withdraw this proposal. |
| **Dossier submitter response:**  Thank you for your comment. These aspects have been discussed in the original dossier. In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g. reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4.  The restriction dossier is concerned on environmental effects of calcium cyanamide use on soil organisms and on releases from a field, however, the DS acknowledges the importance for growers to get an economic return from their fields. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for your comment. In the cost analysis SEAC took into consideration a decrease in crop yields (e.g. marketable crops) and possible additional use of approved PPPs in addition to N-fertilizer instead of calcium cyanamide secondary effects. |
| **2950** | **Date:** 2020/03/24 06:42  **Content:**  Scope or restriction option analysis  **Type:** BehalfOfAnOrganisation  **Org. type:** Industry or trade association  **Org. name:** Japan Lime Nitrogen Industrial Association  **Org. country:** Japan  **Attachment:** | **Comment:**  The Japan Lime Nitrogen Industrial Association is an industry organization established to promote instruction in and dissemination of the appropriate use of lime nitrogen for sustainable environmental conservation agriculture. Herein, we respond to public comments based on our extensive knowledge of manufacturing lime nitrogen in Japan (dating back to 1909).  In Japan, the safe use of lime nitrogen by manufacturers and others is regulated under the Pesticide Control Law and Fertilizer Control Law.  In particular, if lime nitrogen is to be sold as a pesticide, it must be registered as per the Pesticide Control Law. At least 30 types of tests are conducted as per the main items shown below for registration, and the safety of the pesticide is assured by undergoing such strict inspections.  ① Physiochemical properties  ② Medical efficacy and phytotoxicity tests  ③ Phytotoxicity tests on damage to nearby crops  ④ Phytotoxicity tests on successive crops  ⑤ Toxicity tests  ⑥ Testing on effects on aquatic animals and plants (fish, crustaceans, algae)  ⑦ Tests on the effects on beneficial organisms other than aquatic animals and plants (birds, bees, silkworms, predatory insects, etc.)  ⑧ Residual tests on crops and soil  Accordingly, the environmental risks of using calcium cyanamide as a fertilizer is the issue for these public comments, but the standard values specified under Japanese Pesticide Control Law and test data are used in these answers. |
| **Answer to specific info request 1:**  (1) In Japan, environmental risks posed by agricultural materials are assessed based on the results of tests specified under the Pesticide Control Law. Herein, the environmental risk assessment for lime nitrogen is based on the results of tests on the effects on aquatic animals and plants as specified by the Ministry of the Environment having set the standard value (upper limit) to 670 μg/L after converting the calcium cyanamide to its cyanamide equivalent, with verification by comparing this cyanamide standard value to the predicted environmental concentration (PEC) converted to cyanamide as described later.  (2) Concerning the effects of calcium cyanamide and cyanamide in aquatic environments, data is introduced about Japanese aquatic Predicted No Effect Concentration (PNEC, hereinafter referred to as No Effect Concentration). In the ECHA proposal, the No Effect Concentration of cyanamide for Daphnia magna is described as 10.44 μg/L, whereas in Japan, that figure is estimated at several hundred μg/L when converting calcium cyanamide to cyanamide.  (3) The Japanese predicted environmental concentration (PEC) is introduced for residual concentrations at sites where calcium cyanamide is used. In the ECHA proposal, the PEC for cyanamide in surface water near cultivated land in farmland is described as 50~600 μg/L, whereas in Japan, 400 μg/L is estimated for paddy fields, and 0.90 μg/L for farmland.  Hereafter, we explain how risks are assessed for environments with aquatic animals and plants and test data (No Effect Concentration, environmental effect concentration) for calcium cyanamide (converted to cyanamide) in terms of aquatic animals and plants.  ① Environmental risk assessment method (See Appendix 1 Chapter 1)  Risks for aquatic animals and plants are assessed by specifying standard values for constituents in pesticides based on the results of tests on their effect on aquatic animals and plants under the “Mechanism of pesticide registration standards to prevent damage to aquatic animals and plants” specified by the Ministry of the Environment as per Fig. 1, and through verification by comparing the PEC in the public water area for constituents of pesticides with standard values. As long as the PEC is below the standard value, the pesticide can be registered.  Standard values for calcium cyanamide are specified by converting it to cyanamide, because it decomposes to cyanamide in water. The standard value is specified as 670 μg/L by conversion to cyanamide as shown in Table 1 by adopting the test data on the effect on Daphnia magna, which are most susceptible based on the results of testing on the effects on aquatic animals and plants as per Fig. 2.  The cyanamide standard value is the “Pesticide registration standard to prevent damage to aquatic animals and plants” created by the Ministry of the Environment, and specified as per the methods described in the evaluation document (Cyanamide and Calcium Cyanamide, or Lime Nitrogen, p11).  ② No Effect Concentration (PNEC) (See Appendix 1, Chapter 2 in detail)  The test data on the effect on Daphnia magna referenced in the calculation of the standard values mentioned above is “Pesticide registration standards to prevent damage to aquatic animals and plants” as per Table 2 created by the Ministry of the Environment, and described in the evaluation document (Cyanamide and Calcium Cyanamide, or Lime Nitrogen, p4). A point worthy of note here is that even though No Effect Concentration is not specified in Japan, Daphnia magna are not affected at a measured concentration of cyanamide of 730 μg/L. The results from Table 2 are presented graphically in Fig. 2.  In the ECHA proposal, it is described the No Effect Concentration on Daphnia magna from cyanamide is 10.44 μg/L, whereas it can be read that its concentration is 730 μg/L from this test data.  ③ Predicted Environmental Concentration (PEC) (See Appendix 1, Chapter 3)  In Japan, environmental risk is assessed by comparing the cyanamide standard values with the predicted environmental concentration converted to cyanamide. The PEC is the “Pesticide registration standards to prevent damage to aquatic animals and plants” created by the Ministry of the Environment as per Figs. 3 and 4, and described in the evaluation document (Cyanamide and Calcium Cyanamide, or Lime Nitrogen, p 8, p 9).  In the ECHA proposal, different crops (application of 200~500 kg/ha of lime nitrogen) are used to measure the PEC of cyanamide in surface water near cultivated land in farmland, with 50~600 μg/L being described, whereas the figure in Japan for paddy fields (application of 1,000 kg/ha of lime nitrogen) is 400 μg/L, which is the toughest condition, and 0.90 μg/L for farmland (application of 700 kg/ha of lime nitrogen). |
| **Answer to specific info request 2:**  Answer to “Q2. Application” (See Appendix 2, Chapter 1)  In Japan, lime nitrogen is used as fertilizer or pesticide to cultivate a variety of crops, such as paddy rice, wheat, beans, vegetables, and fruit trees. The details are presented below. Also, how pesticides can be used is described in the “Scope of pests to which pesticides can be applied and usage method (Application table)” as approved by the Ministry of Agriculture, Forestry, and Fisheries as per Table 1.  200~700 kg/ha can be applied after reaping, sowing, or planting paddy rice.  200~700 kg/ha can be mixed with soil after applying before sowing for wheat.  200~1,000 kg/ha can be mixed with soil after applying it before sowing for beans.  400~2,000 kg/ha can be mixed with soil after applying before sowing or planting for vegetables.  200~500 kg/ha can be mixed with soil after applying to restore tree vigor after harvesting for fruit trees.  When used as a pesticide for weeds, disease, or pest control, etc.:  500~700 kg/ha can be applied before sowing or planting for annual weeds afflicting vegetables.  1,000~2,000 kg/ha can be mixed with soil after applying before sowing or planting for clubroot disease afflicting Chinese cabbage or cabbage.  500~1,000 kg/ha can be mixed with soil after applying before sowing or planting for nematodes afflicting vegetables. |
| **Answer to specific info request 3:**  The characteristics of lime nitrogen are: (1) Supplying slow-release fertilizer, (2) Restraining nitrification, (3) Adjustment of soil pH, and (4) Restraining creation of greenhouse gases due to simultaneous use with organic matters.  In Japan, it is known that applying “organic compound fertilizer that contains lime nitrogen” – wherein the organic matter content constitutes one-fifth of the nitrogen content – to the cultivation of cabbage, once a year in spring, yields a similar crop as applying ammonium sulfate twice a year in spring and autumn. In the test plot where ammonium sulfate was applied, it did not raise the soil pH or affect the carbon storage, as expected. |
| **Dossier submitter response:**  Thank you for the information from Japan. Based on the comment it appears that calcium cyanamide is also used in Japan – the comment provides information about registration under “pesticide registration”. DS understands you have presented the PNECfreshwatwer derivation for calcium cyanamide as well as PEC calculations. The DS underlines that a direct comparison with the approach presented in the BD in relation to crops, conditions and application rates is not possible |
| **RAC Rapporteurs comments:** RAC notes that the information is related to the pesticide registration in Japan under their respective regulatory framework. The application rates mentioned in the comment are also noted. However, for RAC was not possible to assess these information as not all information on the ecotoxicity studies and PEC derivation details were provided. |
| **SEAC Rapporteurs comments:**  Thank you for the information that calcium cyanamide is regulated under the Pesticide Control Law and Fertilizer Control Law in Japan which indicates the confirmed PPP properties of calcium cyanamide. |
| **2951** | **Date:** 2020/03/24 10:24  **Type:** BehalfOfAnOrganisation  **Org. type:** National NGO  **Org. name:** Boerenbond  **Org. country:** Belgium  **Attachment:** | **Comment:** |
| **Dossier submitter response:**  Thank you for your comment. These aspects have been discussed in the original dossier. In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to CaCN2.  In relation to the so-called secondary benefits (e.g.reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4. The restriction dossier is concerned on environmental effects of calcium cyanamide use on soil organisms and on releases from a field, however, the DS acknowledges the importance for growers to get an economic return from their fields. |
| **RAC Rapporteurs comments:** |
| **SEAC Rapporteurs comments:**  Thank you for your comment. SEAC considered loss of profits for farmers as a result of the proposed restriction. |
| **2952** | **Date:** 2020/03/24 15:02  **Content:**  Environmental emissions;  Information on benefits  **Type:** Individual  **Country:**  Germany | **Comment:**  After almost 40 years of professional experience in research and consulting and almost 60 years of practical experience in the application of calcium cyanamides on an agricultural part-time farm, I absolutely cannot understand higher restrictions for this fertilizer.  Calcium cyanamides have always been more expensive than other mineral nitrogen fertilizers. In agricultural advice and practice, however, it found a consistant sales market.  The reasons for this were:  • Slow, continuous nutrient effect  • Healthy plant growth  • Stabilization of the ph-value in the soil  • Avoidance of Calcium deficiencies in crops, including forage plants  • The foundation stone for the health of crops and good stock development.  For these reasons, but also because of the higher costs, lime nitrogen is applied very specifically on agricultural and horticultural holdings. Serious negative effects on the environment and health are not known.  The advantages above were also presented by the state official advisory service within the framework of integrated crop production in Bavaria for decades. This would not have happened if the risks now mentioned in ECHA's dossier had been revealed in the independent investigations of state research institutions. On the contrary, the advantages of this fertiliser became apparent in the following points:  • Low risk of nitrate leaching due to delayed release of nitrate  • Low nitrate levels, e.g. in vegetables  • Maintaining a good soil structure with all the associated benefits  • Reduced risks to crops from individual diseases and pests due to Calcium cyanamide specific environment.  The arguments in the dossier and the conclusions of ECHA are suitable to discredit agricultural practice, government advice and practice-oriented agricultural research throughout Europe. It could be the first step to ban mineral fertilisers as a whole. |
| **Dossier submitter response:**  Thank you for your comment. These aspects have been discussed in the original dossier. In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to calcium cyanamide. In relation to the so-called secondary benefits (e.g.reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression, wireworms and millipede repellence) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for your comment. SEAC considered loss of profits for farmers as a result of the proposed restriction. |
| **2953** | **Date:** 2020/03/24 15:29  **Content:**  Information on benefits;  Other socio economic analysis (SEA) issues  **Type:** Individual  **Country:**  Belgium | **Comment:**  - |
| **Answer to specific info request 2:**  As a fertiliser expert Benelux for K+S Minerals and Agriculture GmbH (based in Kassel) since 01/04/2004 and also as a consult for Perlka since 01/01/2018 I already observed the benefits for the farmers using calcium cyanamide for quite a lot of crops. Summarised, Perlka is a perfect match providing nitrogen and calcium together with the well reputated potassium-and magnesium fertilisers such as Patentkali, ESTA Kieserite, Magnesia-Kainit which are of natural origin. These facts I’m defending since a long time in the whole agricultural chain |
| **Answer to specific info request 3:**  Calcium cyanamide is, as far as I know, the only nitrogen based fertiliser with a liming capacity at the same time. This makes it very useful for using it for straight application in the upper bottom layer of the soil and as a located fertiliser. Such a fertiliser will become more and more important for precision farming due to the secure performance in seed machines.  Since there is the aim of restriction of nitrate-leaching, some official institutes (for ex. Inagro Rumbek-Beitem) can confirm reduced levels of nitrate in the soil at the end of the season by using calcium cyanamide. This is due to the specific action of calciumcyanamide, because this form (nitrate) in only formed at the end of the process and the ammonium form is well taken by the roots before this step. This topic has become a huge issue in Flanders (see MAP action plan) and therefore calcium cyanamide will definitely play a very important role for this issue.  Perlka is regarded to act like a slow release fertiliser ‘avant la lettre’ because of the effect of dicyandiamide. It means no coating (microplastic!) was necessary, it is part of characteristics of calciumcyanamide |
| **Answer to specific info request 4:**  The quality of the harvested vegetables, fruit and main crops (f. ex. Potatoes) has always been a key factor of the Belgian success story for export and internal consumption. Belgium is the biggest producer of processed potatoes (French fries etc.) and concerning the vegetable industry Belgium and the Netherlands as well, are one of the leading countries. In order to keep this position, the quality of the harvested crops (incoming product) must be of a very high standard. If it becomes more difficult for the farmer to meet these high requirements, it will have a negative effect of the financial result. According to my long-term experience as a fertilising adviser calcium cyanamide is an indispensable fertiliser for the production of high quality vegetables in intensive crop rotations. |
| **Dossier submitter response:**  Thank you for your comment. These aspects have been discussed in the original dossier. In relation to the slow nitrogen releasing properties of calcium cyanamide and the use of plastic coating on alternative fertilizers, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g.reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression, wireworms and millipede repellence) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4 on advantages of calcium cyanamide (including the secondary benefits). |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for your comment. SEAC considered loss of profits for farmers as a result of the proposed restriction. |
| **2954** | **Date:** 2020/03/24 23:08  **Content:**  Scope or restriction option analysis  **Type:** Individual  **Country:**  Poland | **Comment:**  I work as a specialist for the protection of plants in horticulture. However, in my work I have often meet problems in crops that are not associated with the presence of pests or pathogens, but are the result of issues related to fertilizing plants. Calcium cyanamide is often using by producers nitrogen fertilizer for open-field in Poland, especially in cabbage, cauliflowers and other brassica-vegetables as well as in strawberry. The application 300 to 500 kg/ha incorporated into the soil about ten days before planting is the ideal source of nitrogen. We have observed good development of root system. Main roots were strong with many fine roots. Plants also had got a better access to the soil’s nutrients such as phosphorous and calcium. What’s more in Poland, we have problems with the acidification of agricultural soils. Calcium cyanamide is a fertilizer that, in addition to the nitrogen dose, deacidifies the soil, making it an added value to nitrogen fertilization. It is very important in brassica-vegetables crop. Many growers observed increasing of marketable yield after changed conventional nitrogen fertilizers to calcium cyanamide. Of course the yield increase is not the same everywhere but visible especially on farms with clay soils. Losing this fertilizer will make it very difficult for the growers to maintain the productivity of their soils and the profitability of the open-field vegetables and strawberries production. For strawberries calcium cyanamide is ideal fertilizer because of calcium ions available for plants. In this crop avoiding high nitrate contents in soil and plants leads to less susceptibility plants to fungal diseases. This reduces the need of spray applications against fungi and helps to meet the requirements of the supermarkets, which are very restrictive for residues of plant protection products.  We never saw any environmental problems caused by the use of this fertilizer, even when was use many years. After application of the calcium cyanamide Perlka we observed particularly good effects of the bioproducts based on the bacteria. So, I don’t understand the proposed ban of calcium cyanamide as I can't see any environmental advantage connected with stopping of use this fertilizer and beginning to use of alternative fertilizers. |
| **Answer to specific info request 1:**  Yuhei Hirono, Kunihiko Nonaka. 2014. Effects of application of lime nitrogen and dicyandiamide on nitrous oxide emissions from green tea fields. Soil Science and Plant Nutrition 60(2): 276-285 |
| **Answer to specific info request 2:**  Usually the application is 300 to 500 kg/ha incorporated into the soil of the planting rows about ten days before planting. |
| **Answer to specific info request 3:**  high content of alkaline ingredients (50 % CaO) in calcium cyanamide prevents soil acidification, improves the soil structure and by this way counteracts soil silting, surface run-off and soil erosion. Retarded nitrification reduces the risk of nitrate leaching remarkably. calcium cyanamide fertiliser could not be replaced by alternative fertilisers like urea (ammonia volatilisation, nitrate leaching), CAN (nitrate leaching, nitrous oxide emissions) or coated slow release fertilisers (microplastics) |
| **Answer to specific info request 4:**  lack of calcium cyanamide will increase the cost of cultivation by the need to increase treatment against plant diseases, which will affect the financial results of farms, especially in the cultivation of brassica vegetables and berries |
| **Answer to specific info request 5:**  In case calcium cyanamide fertiliser was not available, increasing the application of other mineral preparations and plant protection products increases the environmental risk |
| **Dossier submitter response:**  Thank you for your comment.  Information on the specific question #1 appears to support that in some cases use of calcium cyanamide affects product quality. Information on the specific question #2 clarifies that in production of some horticulture crops, similarly as in case of apples (# 2762), the per-hectare amount is not necessarily evenly applied to a field, but in some part of the field the application rate might be clearly higher than the average, whereas in some parts it may be practically zero.  These aspects have been discussed in the original dossier. In relation to the slow nitrogen releasing properties of calcium cyanamide, the reduced nitrogen leaching and the increase in application of plant protection products, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g.reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression, wireworms and millipede repellence, increase of the soil pH) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4. The restriction dossier is concerned with environmental risks of calcium cyanamide on soil and aquatic organisms. However, the DS acknowledges the importance for growers to get an economic return from their fields. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for the information. SEAC considered loss of profits for farmers and possible additional use of approved PPPs in addition to N-fertilizer instead of calcium cyanamide as a result of the proposed restriction. |
| **2955** | **Date:** 2020/03/25 12:20  **Content:**  Information on benefits  **Type:** Individual  **Country:**  Italy  **Attachment:**  <redacted>  **Privacy comment:** Ritengo che l'apporto di esperienze a supporto di tale decisione debba rimanere confidenziale con ECHA | **Comment:**  La calciocianamide è il riferimento per i fertilizzanti speciali pur essendo un concime semplice azotato inserito nelle normative di settore. La Calciocianamide è stato il primo concime azotato di sintesi ed è utilizzata da più di 100 anni. La compresenza di Azoto e Calcio grazie alle loro caratteristiche ed al modo in cui sono messi a disposizione della pianta, sono in grado di garantire incrementi qualitativi e quantitativi delle produzioni. |
| **Answer to specific info request 2:**  Riso ed orticole  tutti i tpi di terreni anche quelli marginali  300/400 kg/ha una applicazione annua  15 minuti per/ha con l'utilizzo di spandiconcime |
| **Answer to specific info request 3:**  a. tipo di azoto azoto cianamidico a lento effetto  b. non esistono alternative analoghe |
| **Answer to specific info request 5:**  Dal punto di punto di vista ambientale, proprio grazie al suo effetto anti nitrificazione permette una minor perdita di azoto e quindi un minor impatto sulle acque e sull’ambiente. |
| **Dossier submitter response:**  Thank you for your comment. These aspects have been discussed in the original dossier. In relation to the slow nitrogen releasing properties of calcium cyanamide and the reduced nitrogen leaching, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g.reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression, wireworms and millipede repellence, increase of the soil pH) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4. The restriction dossier is concerned on environmental effects of calcium cyanamide use on soil and aquatic organisms. However, the DS acknowledges the importance for growers to get an economic return from their fields.  Grazie per aver presentato le vostre osservazioni. Questi aspetti sono stati discussi nel fascicolo di restrizione. Per quanto riguarda le basse emissioni di azoto della calciocianamide e la riduzione della lisciviazione dell'azoto, si veda la risposta generale DS3 sulle alternative alla calciocianamide.  Per quanto riguarda i cosiddetti benefici secondari (ad esempio, l'accumulo ridotto di nitrati nelle piante, l'eliminazione dei parassiti, la repressione delle malattie fungine, l’azione repellente verso parassiti e millepiedi, l'aumento del pH del suolo) e l'effetto benefico del Ca(OH)2 sulle piante e sul suolo, si rimanda alla risposta generale DS4. Il fascicolo relativo alla restrizione riguarda gli effetti ambientali dell'uso della calciocianamide per quanto riguarda il suolo e gli organismi acquatici. Tuttavia, il DS riconosce l'importanza per i coltivatori di ottenere un ritorno economico dalle loro coltivazioni. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for information. SEAC took into consideration a possible loss of profits for farmers as a result of the proposed restriction. |
| **2956** | **Date:** 2020/03/25 14:17  **Content:**  Information on alternatives;  Information on benefits;  Other socio economic analysis (SEA) issues  **Type:** BehalfOfAnOrganisation  **Org. type:** Company  **Org. name:** FERTISTAV CZ a.s.  **Org. country:** Czech Republic | **Comment:**  Since our company started to sell calcium cyanamide Perlka we saw that there is a big interest from farmers. This comes from the long tradition of using calcium cyanamide in agriculture in the Czech Republic. There is over 100 years worth of experience with this type of fertilizer among the farmers. Years ago it was used on the fields in powdered form, and everyone was happy to learn that now there is availability for the granular, affordable version. |
| **Answer to specific info request 3:**  The main advantage of calcium cyanamide comes from the raw material used for its production. Carbon, Calcium Carbonate and Nitrogen all come from nature. By using calcium cyanamide we return these natural elements back to the soil.  Compared to chemical alternatives (such as VYDATE-G or FORCE-G) for soil disinfection against pest and Funghi diseases, the biggest advantage of Perlka is its lack of toxicity. |
| **Answer to specific info request 4:**  The other advantage is that using Perlka for soil disinfection is simply cheaper and can save around 30 % of expenses for the farmer.  Agricultural production, vegetable and fruit production in particular, often contain chemical residues on its crops and there is a strong lobby to reduce toxicological burden on production and environment.  Vegetable farmers (especially root vegetables and cruciferous vegetables and potatoes) and fruit farmers (especially pome fruits and stone fruits) would be the most affected if the use of this fertilizer was banned, as they cannot imagine their production without it. |
| **Dossier submitter response:**  Thank you for your comment. These aspects have been discussed in the original dossier. In relation to alternatives to calcium cyanamide, please refer to general response DS3 on alternatives to calcium cyanamide.  In relation to the so-called secondary benefits (e.g.reduced nitrate accumulation in plants, wireworm suppression, fungal disease suppression, wireworms and millipede repellence, increase of the soil pH) and the beneficial effect of Ca(OH)2 on plants and soil, please refer to general response DS4. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for the information. SEAC took into consideration that the proposed restriction will cause a loss of profits and possible additional use of approved PPPs in addition to N-fertilisers or other costly plant protection methods instead of calcium cyanamide. |
| **2957** | **Date:** 2020/03/25 16:15  **Content:**  Scope or restriction option analysis  **Type:** BehalfOfAnOrganisation  **Org. type:** Industry or trade association  **Org. name:** AlzChem Trostberg GmbH  **Org. country:** Germany  **Attachment:** | **Comment:**  PUBLIC CONSULTATION – CALCIUM CYANAMIDE  ALTERNATIVE RESTRICTION OPTION  The Registrant disagrees with the conclusion of the Dossier Submitter (DS) to ban the use of calcium cyanamide as fertiliser due to allegedly uncontrollable risks to the aquatic and terrestrial compartment without really considering the new field studies performed under realistic conditions for the application of calcium cyanamide as fertiliser.  In its aquatic hazard assessment RAC considers the aquatic mesocosm study by Hommen (2019) only as supportive for the chronic 21-d Daphnia magna study.  The Registrant wants to stress that this evaluation is based on an extremely conservative assessment of the results of the mesocosm study as well as by not considering the ecological recovery option (ERO) which is an acceptable option for plant protection products that are used in a similar way as fertilisers.  Even in case the chronic 21-d Daphnia magna study were still to be considered as key study for deriving the PNECfreshwater, a refinement of the aquatic hazard assessment would be justified, in particular the use of a less conservative AF. The aquatic mesocosm study as well as the non-standard daphnia study by Brueggemann (2019) were performed under more realistic conditions than the standard 21-d Daphnia magna study and thus significantly reduce the uncertainties regarding potential effects of cyanamide to aquatic organisms when calcium cyanamide is used as fertiliser.  The Registrant further notes that even on the condition that the PNECfreshwater will not change from the present level of 0.0104 mg cyanamide/L the risks of using calcium cyanamide as fertiliser can still be adequately controlled provided the use of calcium cyanamide is restricted as follows:  • Grassland:  No spring application on impermeable clay soils with field drains  • On sloping fields adjacent to surface waters:  No broadcast application. Application by deep placement only, not exceeding 250 kg/ha PERLKA  As for the terrestrial hazard assessment it needs to be kept in mind that according to the new fertiliser regulation no. 2019/1009, “…the safety of the intended use of the EU fertilising product is demonstrated in a manner comparable to that achieved through other regulatory regimes for products intended for use on arable soil or crops, notably Members States’ national fertiliser legislation and Regulation (EC) No 1107/2009” for placing of plant protection products on the market.”  For cyanamide, the first metabolite of calcium cyanamide in soil, collembolan have been identified as the most sensitive species. Based on a standard 28-d study with Folsomia candida resulting in an EC10 of 1.5 mg/kg soil and by applying an assessment factor of 10, the DS derived a PNECsoil of 0.15 mg/kg soil dw.  Following this conservative standard, the REACH approach leads to an uncontrollable risk to soil organisms in most of the application scenarios.  However, if the hazard of calcium cyanamide used as fertiliser is correctly assessed in a manner comparable to that achieved by Regulation (EC) No 1107/2009, higher tier studies investigating initial effects as well as long-term effects on populations and/or the community of collembolans should also be considered.  “As a general acceptability criterion for in-field effects, the potential for re-colonisation after a toxic effect should usually be demonstrated within one year” (Candolfi, 2003, page 20). ‘For terrestrial non-target arthropods (NTAs) [this] current practice is based on Escort 2, where in-field recovery shown within one season is considered acceptable’ as confirmed by EFSA in its Scientific Opinion ‘Recovery in environmental risk assessments at EFSA’ (2016).  The collembolan field study by Stegger (2020) has clearly shown that collembolans are not adversely affected by the use of calcium cyanamide as fertiliser at application rates of up to 400 kg/ha PERLKA, equivalent to a PECsoil of 11.9 mg/kg soil dw cyanamide (Kiefer, 2019). Recovery of all observed species could be demonstrated within one year after first application. As PERLKA was applied two times with a time interval of 6 months, the chosen trial design represents a worst-case exposure scenario.  Thus, the use of calcium cyanamide as fertiliser does not pose an unacceptable risk to collembolans up to a use rate of 400 kg/ha PERLKA equivalent to a calculated concentration of 11.9 mg/kg soil dw cyanamide.  As the collembolan field study was conducted on grassland for which the upper five centimetre soil layer are considered for PEC calculation, this concentration constitutes the worst-case exposure scenario.  CONCLUSION:  For the aquatic compartment, the Registrant has provided two higher tier studies, investigating the effect of cyanamide on a large number of species under realistic exposure conditions. This allows a refined hazard assessment as the uncertainties regarding the effects of calcium cyanamide to aquatic organisms have significantly been reduced.  Even if the highly conservative PNECfreshwater remained unchanged, the risk of calcium cyanamide to the aquatic compartment could still be adequately controlled by excluding its use on drained grassland in spring on impermeable clay soils. In addition, the application on sloping fields adjacent to surface waters could be confined to deep placement with a maximum application rate of 250 kg/ha PERLKA.  As for the terrestrial compartment, an acceptable risk was clearly demonstrated in a collembolan field study up to a concentration of 11.9 mg/kg soil dw cyanamide covering all use scenarios.  The proposed restriction is practical, implementable and feasible. It will reduce all negative environmental risk potentially occurring from the use of calcium cyanamide as fertiliser and can be implemented and monitored within the existing administrative structures for the use of fertilisers in the EU.  References  Brueggemann, M. 2019: Daphnia magna, Reproduction test with modified exposure in a water sediment system (based on OECD 211) Effect of Cyanamide on the reproduction of Daphnia magna. Report dated 17 May 2019. Sponsor: AlzChem Trostberg GmbH.  Candolfi, M. P. (2003): Guidance document on regulatory testing and risk assessment procedures for plant protection products with non-target arthropods. From the ESCORT 2 Workshop (European Standard Characteristics of Non-Target Arthropod Regulatory Testing) : a joint BART, EPPO/CoE, OECD, and IOBC workshop organised in conjunction with SETAC Europe and EC : held at Wageningen International Conference Center, Wageningen, the Netherlands, 21-23 March 2000. Pensacola, FL: Society of Environment Toxicology and Chemistry.  EFSA Scientific Committee, 2016. Scientific opinion on recovery in environmental risk assessments at EFSA. EFSA Journal 2016; 14(2):4313. 85 pp. doi:10.2903/j.efsa.2016.4313  Hommen, U. 2019: Cyanamide - Outdoor aquatic mesocosm study. Report dated 25 July 2019. Sponsor: Alzchem Trostberg GmbH.  Kiefer, M. 2019: Predicted Environmental Concentrations in Soil of Calcium Cyanamide and Cyanamide after fertilization with PERLKA® using ESCAPE V2.0. Report dated 17 April 2019. Alzchem Trostberg GmbH.  Stegger, P. 2020: Field Study to Evaluate the Effects of granulated calcium cyanamide fertiliser (PERLKA®) on collembolan in Central Europe. Report dated 28 February 2020. Sponsor: AlzChem Trostberg GmbH. |
| **Dossier submitter response:**  Thank you for the comment. DS notes, that in order to remove the risk, it is not sufficient that the run-offs or groundwater releases are controlled, but the risks to soil organisms need to be also in control.  In relation to the field study on collembola (Stegger, 2019), the DS has observed some uncertainties, as described in the BD. The study evaluates the effect of calcium cyanamide on collembola only, no other terrestrial specie is evaluated at the same time. Field studies normally evaluate the effect of a substance on the whole population present in standard conditions in the soil. Finally, due to the likely endocrine disruption properties of cyanamide, the risk to soil might not be removed.  In relation to the aquatic mesocosm (Hommen, 2019) and non-standard daphnia study by Brueggemann (2019), the Dossier Submitter acknowledges the results of such studies. However, as described in the BD, the DS has concluded to use them as supporting information to the results obtained in standard laboratory studies. |
| **RAC Rapporteurs comments:**  RAC support DS response. Please refer to comment 2769 on specific studies and the opinion document for the justification of PNEC derivation. |
| **SEAC Rapporteurs comments:**  Thank you for the information. |
| **2958** | **Date:** 2020/03/20 14:34  **Org. name:** Australian Agricultural Marketing Organisation Pty Ltd  **Org. country:** Australia  **Attachment:**  <redacted> | **Comment:**  We attach our comments and wish to make confidential submission in support of maintaining use of Perlka calcium cyanamide in Europe as without this classification in Australia our strict use of calcium cyanamide as a fertiliser would not be possible and growers in Australia rely upon continued and increasing use of Perlka Calcium cyanamide for their profitability and viability.  We strongly object and disagree with the proposal to restrict Perlka calcium cyanamide use as a fertiliser in Europe and wish to make it clear to ECHA that Perlka calcium cyanamide is a product used Globally and in many countries such as Australia Australian growers rely upon continued use as a fertiliser in Europe to allow continued use in Australia. I speak on behalf of all growers in Australia of over 25 different crop types where Perlka is used and indeed vital for crop health and high yields and growers viability.  We implore ECHA to consider other countries when making determinations relating to restriction of use of Perlka calcium cyanamide in Europe and understand that such determinations have far reaching consequences to agricultural production and viability and also breaking the dependance of growers upon agricultural chemicals such as in Australia where the environmental benefits of Perlka calcium cyanamide are understood and highly valued.  We attach further information we wish to submit. We wish this information to be confidential as it contains commercially sensitive information however feel ethically impelled to make a submission on behalf of growers in Australia whom rely upon Perlka calcium cyanamide fertiliser use for their profitability and viability. |
| **Dossier submitter response:**  Thank you for the information. The comment clarifies the usefulness of calcium cyanamide as a fertiliser from the point of view of an Australian distributor of Perlka. |
| **RAC Rapporteurs comments:**  RAC agrees with the DS response. |
| **SEAC Rapporteurs comments:**  Thank you for the information. SEAC agrees with the DS response. |