



**Ministry of Environment
of Denmark**

Environmental
Protection Agency

Pesticides and Biocides
Case No 2019 - 9071
Ref. NIFAL
December 7 2021

European Chemicals Agency
Biocidal Products Committee
Erik van de Plassche

BPC-41: Minority opinion on the proposal for approval of cyanamide in PT 3 and 18

The Danish Competent Authority notes that cyanamide shall be considered as having endocrine disrupting properties according to the criteria laid down in Regulation (EU) 2017/2100. We therefore consider that the use of cyanamide in biocidal products should be limited as far as possible, especially where the risk to humans, animals or the environment from exposure to the active substance in a biocidal product, under realistic worst case conditions of use, cannot be considered as negligible.

We understand from comments supplied so far by stakeholder representatives that no suitable chemical or non-chemical alternatives are available. However as stated in the opinion, the validity of the majority of submitted statements could not be checked because no references were given or can easily be found by literature research. It remains therefore unclear whether cyanamide is the only active substance suitable for the intended use. Approximately 28 million pigs are produced annually in Denmark, and cyanamide does not seem to be necessary for the intended use. The alternatives used in Denmark are listed in the opinion. Based on the statements above, Denmark is of the opinion that there are relevant alternatives and can therefore not support an approval of cyanamide.

Yours sincerely,

Nina Falk Gregersen
Scientific Officer
+45 22 34 95 23
nifal@mst.dk