From: "5.1.2.e "
Sent: Mon, 13 Oct 2025 15:12:18 +0200
To: "5.1.2.e "" <5.1.2.e @minlnv.nl>
Subject: AP TFA graag vandaag reactie
Categories: Archiveren

Hoi 5.1.2.e

Graag je akkoord op onderstaand AP over TFA van SCoPAFF oktober, het moet vandaag richting COM.

Groet,

5.1.2.e

Dear 5.1.2.e 5.1.2.e and 5.1.2.e

Please find below the NL comments on Trifluoroacetic acid (TFA):

In response to the request from Germany and The Netherlands to initiate an Article 21 procedure for 6 active substances for which the renewal process has not yet started, the Commission indicated that it is considered necessary to wait for the outcome of the new mandate Commission has formulated for ECHA and EFSA first and that there are no indications in the dossiers that TFA is formed. We would like to respond to this as we see this differently.

In regulation 1107/2009 article 21 it is not mentioned anywhere that Commission needs to wait to initiate an Article 21 procedure until it is clear exactly how it can be carried out. Moreover, Denmark has developed methodology as described in the article 44 notification that may be used for these actives as well.
There are sufficient indications that all/the majority of PFAS-actives will break down into TFA, this can be looked at during an article 21 procedure for the specific actives. The fact that there are no indications in the dossiers that TFA is formed in the lab, does not mean that TFA will not be formed in the environment. It is more likely that not finding TFA in the dossiers has to do with the way the studies have been performed (not long enough, radioactive label at the wrong site, inappropriate analytical method).

NL appreciates the new mandate that Commission has formulated for ECHA and EFSA, but we are worried about the timelines. The TFA discussion has been ongoing for a long time, and now another 18 months will be added. We believe this mandate can certainly be done more quickly, as the Danish methodology is already available. In the current renewal dossiers of PFAS-active substances, Member States face a similar challenge to that required for an Article 21 procedure, so we see no reason not to initiate Article 21. With the help of the information already gathered by various MSs regarding the methodology, we are convinced that it is possible to complete this task in less than 18 months. Of course also NL is willing to share information with EFSA/ECHA when needed.

Best regards, etc

5.1.2.e
5.1.2.e
5.1.2.e

Ctgb
College voor de toelating van gewasbeschermingsmiddelen en biociden
Board for the Authorisation of Plant Protection Products and Biocides

Bezoekadres / visiting address:

Bennekomseweg 41, NL6717 LL Ede

Type voor navigatie Horapark in

Postadres / postal address:

Postbus / P.O. box 8030, NL6710 AA Ede, The Netherlands

T 5.1.2.e / 5.1.2.e
I www.ctgb.nl