

**From:** "5.1.2.e"  
**Sent:** Fri, 31 Oct 2025 18:26:58 +0100  
**To:** ""5.1.2.e"" <5.1.2.e@minlnv.nl>  
**Subject:** FW: Danish EPA comments on Point A.10 1. Trifluoroacetic acid TFA  
**Attachments:** DEPA's evaluation of TFA forming active substances 20-10-2025.docx  
**Categories:** Archiveren

Ter info, zie bijlage en mails hieronder.

Groet,

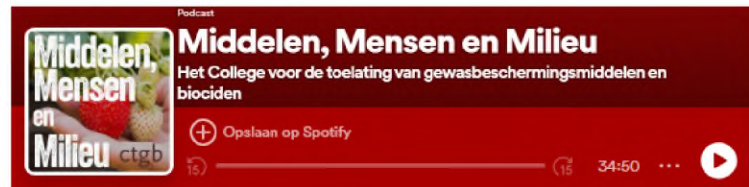
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I [www.ctgb.nl](http://www.ctgb.nl)



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**From:** 5.1.2.e (5.1.2.e) <5.1.2.e@ctgb.nl>  
**Sent:** vrijdag 31 oktober 2025 13:48  
**To:** 5.1.2.e (5.1.2.e) <5.1.2.e@ctgb.nl>; 5.1.2.e (5.1.2.e) <5.1.2.e@ctgb.nl>; 5.1.2.e (5.1.2.e) <5.1.2.e@ctgb.nl>  
**Subject:** FW: Danish EPA comments on Point A.10 1. Trifluoroacetic acid TFA

Ter info, dit is door DK verstuurd naar de DCG/HLM deelnemers groep.

Groet, 5.1.2.e

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**From:** 5.1.2.e <5.1.2.e@mst.dk>  
**Sent:** vrijdag 31 oktober 2025 12:25  
**To:** 5.1.2.e (5.1.2.e) <5.1.2.e@ctgb.nl>; MST Pesticider (enhedens postkasse) <[pesticider@mst.dk](mailto:pesticider@mst.dk)>; '5.1.2.e@tukes.fi' <5.1.2.e@tukes.fi>; 'info@vatzum.lt' <[info@vatzum.lt](mailto:info@vatzum.lt)>; '5.1.2.e@vatzum.lt' <5.1.2.e@vatzum.lt>; 'zonal@vaad.gov.lv' <[zonal@vaad.gov.lv](mailto:zonal@vaad.gov.lv)>; '5.1.2.e@vaad.gov.lv' <5.1.2.e@vaad.gov.lv>; '5.1.2.e@mattilsynet.no' <5.1.2.e@mattilsynet.no>; '5.1.2.e@mattilsynet.no' <5.1.2.e@mattilsynet.no>; 'postmottak@mattilsynet.no' <[postmottak@mattilsynet.no](mailto:postmottak@mattilsynet.no)>; '5.1.2.e@kemi.se' <5.1.2.e@kemi.se>; '5.1.2.e@kemi.se' <5.1.2.e@kemi.se>; '5.1.2.e@kemi.se' <5.1.2.e@kemi.se>;

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'5.1.2.e @minrol.gov.pl' <[5.1.2.e@minrol.gov.pl](mailto:5.1.2.e@minrol.gov.pl)>

**Subject:** VS: Danish EPA comments on Point A.10 1. Trifluoroacetic acid TFA

Dear Colleagues

Please find below an email sent to the Commission Denmark supports the request to initiate immediately art. 21 review and find that the procedure should be initiated for all actives included on the Commission list, including those where renewal is already ongoing. From a Danish perspective we emphasise the need to review the approval of lambda-cyhalothrin, oxathiapiprolin, picolnafen, pyroxsulam and tefluthrin.

Further please find a translation of the assessment underlaying the withdrawals of pesticide products containing the 6 PFAS active substances Diflufenican, Flonicamid, Fluazinam, Fluopyram, Mefentrifluconazole and Tau-fluvalinate in

Denmark due to formation of TFA. Further information on withdrawals is available in the art. 44 notifications in EFSC.

Have a nice weekend.

Best Regards,

5.1.2.e  
5.1.2.e | Pesticider  
5.1.2.e | 5.1.2.e [@mst.dk](mailto:5.1.2.e@mst.dk)

**Miljø- og Ligestillingsministeriet**

Miljøstyrelsen | Lerchesgade 35 | 5000 Odense C | Tlf. +45 72 54 40 00 | [mst@mst.dk](mailto:mst@mst.dk) | [www.mst.dk](http://www.mst.dk)

[Sådan håndterer vi dine personoplysninger](#)

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**Fra:** 5.1.2.e <5.1.2.e [@MST.DK](mailto:5.1.2.e@mst.dk)>

**Sendt:** 21. oktober 2025 09:05

**Til:** 5.1.2.e <5.1.2.e [@ec.europa.eu](mailto:5.1.2.e@ec.europa.eu)>; 5.1.2.e <5.1.2.e

5.1.2.e [@ec.europa.eu](mailto:5.1.2.e@ec.europa.eu)>; 5.1.2.e [@ec.europa.eu](mailto:5.1.2.e@ec.europa.eu)

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**Emne:** Danish EPA comments on Point A.10 1. Trifluoroacetic acid TFA

Dear all

Please find enclosed a translation of the assessment underlaying the withdrawals of pesticide products containing the 6 PFAS active substances Diflufenican, Flonicamid, Fluazinam, Fluopyram, Mefentrifluconazole and Tau-fluvalinate in Denmark due to formation of TFA. Further information on withdrawals is available in the art. 44 notifications in EFSC.

Based on the our assessment of available information we conclude that active-substances containing a C-CF<sub>3</sub> group will most likely lead to formation of TFA. We therefore support the request to initiate immediately art. 21 review and find that the procedure should be initiated for all actives included on the Commission list, including those where renewal is already ongoing. From a Danish perspective we emphasise the need to review the approval of lambda-cyhalothrin, oxathiapiprolin , picolinafen, pyroxsulam and tefluthrin.

The art. 21 review should be targeted to formation of TFA and leaching of TFA to groundwater.

For all actives the notifiers/RMS should be requested within a short deadline to provide documentation that available degradation studies have adequately addressed potential formation of TFA and the risk of leaching to groundwater – if a risk to groundwater is identified a prompt decision with appropriate restrictions/non approval should be taken.

If TFA formation cannot be disproved based on the available studies/risk of leaching is not addressed, the precautionary principle must be applied and worst-case groundwater modelling assuming a TFA formation rate of 1, should be required as suggested by DE.

DEPA considers that available information demonstrates that TFA formation can be addressed based on the OECD 307 guideline, if appropriate radioactive labelling and/or specific analytical methods are used and the duration of the study is prolonged to ensure that degradation is followed for a sufficient period of time.

Mandating EFSA to further develop the methodology to determine metabolites can proceed simultaneously to ensure the implementation of appropriate detection and analytical methods for degradation products in general, but should not delay the art. 21 procedure for PFAS active substances that are expected to form TFA.

Best regards, 5.1.2.e

5.1.2.e

5.1.2.e | Pesticides

5.1.2.e | 5.1.2.e @mst.dk

**Ministry of Environment and Gender Equality**

**Environmental Protection Agency** | Lerchesgade 35 | Dk-5000 Odense C | Tel. +45 72 54 40 00 | [mst@mst.dk](mailto:mst@mst.dk) | [www.mst.dk](http://www.mst.dk)