EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Food Safety, Sustainability, and Innovation
The Director

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Director Plant Supply Chains and Food Quality

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Subject: Your letter of 30 June 2025 titled "Trifluoroacetic acid (TFA) in plant protection products and biocides"

Dear 5.1.2.e and 5.1.2.e

Thank you for your abovementioned letter (your ref: DGA / 99542800, registered under our ref: Ares(2025)6035198) sent on behalf of the Minister of Agriculture, Fisheries, Food Security and Nature and the State Secretary of Public Transport and the Environment.

In your letter you outline concerns about the contamination of groundwater with the metabolite trifluoroacetic acid (TFA), which may be formed from certain active substances used in plant protection products (PPPs) and biocidal products (BPs) and call for reviews in accordance with Article 21 of Regulation (EC) 1107/2009 and Article 15 of Regulation (EU) 528/2012 of approvals of the relevant active substances where a renewal process is not yet started.

Let me start by underlining that as a result of the strict criteria in the EU legislation on pesticides and biocides, many PFAS active substances (including some that form TFA) have already been removed from the European market over the past years, most recently flufenacet and tritosulfuron.

As you note in your letter, it is widely recognised that TFA originates from multiple sources; refrigerants and blowing agents present a significant source of contamination as well as industrial output, municipal wastewater, liquid manure and use of PPPs further contributing to contamination. According to Swiss groundwater monitoring ([1]) *"exceptionally high peak values of over 10 µg/l were recorded at two neighbouring monitoring sites located near a watercourse that also contains treated industrial wastewater"*. A 2024 report ([2]) from Denmark concludes that precipitation contains TFA at a concentration between 0.2 – 1 µg/L and therefore is a major source of

([1]) https://www.bafu.admin.ch/bafu/en/home/topics/water/groundwater/groundwater-quality/tfa-im-grundwasser.html

([2]) Diffus grundvandsforurening med trifluoreddikesyre (TFA). / Albers, Christian Nyrop. GEUS, 2024. 60 s. (Danmarks og Grønlands Geologiske Undersøgelse Rapport; Nr. 4, Bind 2024). Diffus grundvandsforurening med trifluoreddikesyre (TFA) - GEUS' publikationer

groundwater contamination. Active substances used in PPPs and BPs are thus not the only source of contamination.

As you may be aware, most of the approved active substances used in PPPs and all of those used in BPs which contain the C-CF3 moiety (and hence in principle can form TFA) are already under review in the context of ongoing procedures related to their potential renewal of approval. As part of the respective risks assessment, the possible formation of TFA in crops and the environment and possible groundwater pollution will be assessed. Decisions on whether the active substances can be renewed or not will be taken on the basis of robust scientific assessments carried out by the respective rapporteur Member States, which will be peer-reviewed by EFSA and the other Member States.

Only six ([3]) active substances used in PPPs that contain the C-CF3 moiety are not currently under review but have been assessed at least once in the EU prior to their initial approval. For two of these (mefentrifluconazole, flutianil) renewal applications must be submitted by 20 March 2026 and 14 April 2026, respectively. For all six substances used in PPPs, the EFSA Conclusions from the previous assessments of those active substances did not indicate formation of TFA in soil nor contamination of groundwater. Concerning mefentrifluconazole, for which the renewal application is due by 20 March 2026, a recent study ([4]) by the Geological Survey of Denmark and Greenland (GEUS) looking at potential formation of TFA from some C-CF3 active substances found that although mefentrifluconazole can be converted to TFA in soil, estimates were low and well below the drinking water and groundwater pesticide threshold value of 0.1 µg/L, although it was highlighted that this was probably because it sorbs strongly to soil organic matter and is converted slowly ([5]). Therefore, the renewal assessment will ensure a full assessment of the possible formation of TFA and the work on the second mandate to EFSA and ECHA may also play a role in that assessment.

As you note in your letter, the Commission has taken action to increase knowledge and understanding about TFA: the Commission has mandated EFSA to re-assess the toxicological reference values of TFA ([6]) and has recently send a second mandate to both, EFSA and ECHA, focused on the formation of TFA in soil and water which will provide important information to enable comprehensive assessments of TFA. In addition, the Commission has signed an agreement with the World Health Organisation to determine the relevant PFAS in drinking water and recommend health-based values for these relevant PFAS. In parallel, the Commission launched a study to analyse treatment techniques and their related costs for PFAS (and TFA) removal from drinking water. I also recall that the process for harmonised classification and labelling for TFA is ongoing ([7]).

I recall that Member States can at any time act to amend or withdraw authorisations of PPPs containing the concerned active substances if there are indications that a requirement laid down in Article 29 of Regulation (EC) No 1107/2009 is not fulfilled. In fact, the above-mentioned report by the GEUS highlighted that TFA formation rates vary greatly from substance to substance and from soil to soil and that the actual risk assessments should therefore be carried out for permitted pesticides containing C-CF3 groups. Denmark accordingly reviewed and withdrew authorisations of PPPs based on the assessments

([3]) Flazasulfuron, flutianil, isoxaflutole, mefentrifluconazole, picolinafen and trifloxystrobin
([4]) Trifluoreddikesyre (TFA) fra pesticider TriFluPest ISBN: 978-87-7038-688-3
([5]) It is noted that the GEUS study did not investigate the other five active substances
([6]) https://open.efsa.europa.eu/questions/EFSA-Q-2024-00502?search=trifluoroacetic
([7]) https://echa.europa.eu/registry-of-clh-intentions-until-outcome/-/dislist/details/0b0236e188e6e587

carried out in which it concluded that their use would lead to unacceptable contamination of Danish groundwater by TFA.

As you are probably aware, we shared your letter with Member States ahead of the Standing Committee on Plants, Animals, Food and Feed (pesticides legislation) held on 1-2 October 2025. We discussed the letter in that meeting noting that Germany had also suggested early review of the same 6 active substances in comments submitted in July 2025. Other Member States were asked for their immediate views or to provide views/comments after the meeting, by 10 October. Denmark expressed support for the proposal of the Netherlands. However, no other Member State has so far expressed support for launching reviews under Article 21 of Regulation (EC) No 1107/2009.

Let me also mention the following considerations that should be taken into account:

1. all active substances containing the C-CF3 moiety (and hence susceptible of producing TFA as a metabolite) used in BPs are currently under review;
2. the renewal process for two of the six active substances used in PPPs that are not currently under renewal will begin in the first half of 2026;
3. the output from the mandates related to TFA in particular the mandate on environmental exposure will be important to ensure a comprehensive scientifically robust assessment of the active substances concerned;
4. the outcome of the previous EU assessments for the concerned six substances where TFA was not identified as metabolite in groundwater and the outcome of the Danish GEUS study where for mefentrifluconazole TFA was < 0.1 µg/L in groundwater;
5. Member States can at any time act to amend or withdraw authorisations of PPPs containing the concerned active substances if they deem this necessary. As the formation of TFA and possible contamination of groundwater vary depending on a number of factors (e.g. specific substance and soil conditions), Member States are best placed to conduct assessments related to specific substances and uses of products. The Netherlands might consider this course of action for products containing the six substances you refer to in your letter (and possibly others).

Therefore, and taking into account that so far only few Member States have called for early reviews for the six substances, the launch of reviews for substances not yet under renewal in accordance with Article 21 of Regulation (EC) 1107/2009 (and Article 15 of Regulation (EU) 528/2012) does not seem appropriate at this point in time. However, this does not exclude that early reviews could be considered appropriate if the situation changes, in particular in view of the ongoing work by the agencies on TFA.

Let me conclude by emphasising that the Commission recognises the concerns from the Netherlands and other Member States about TFA and is committed to ensuring that decisions on the potential renewal of approval of active substances that may generate TFA are robust, ensuring protection of health and the environment.

Yours sincerely,

[e-signed]

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