To the attention of:

Olivér Várhelyi, Commissioner for Health and Animal Welfare Christophe Hansen, Commissioner for Agriculture and Food Jessica Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

4 March 2025

Subject: Call for a comprehensive ban of PFAS pesticides

Dear Commissioner Várhelyi, Dear Commissioner Hansen, Dear Commissioner Roswall,

We, the undersigned Members of the European Parliament, fully support the European Commission's proposal to ban the PFAS pesticides flufenacet and flutolanil¹. However, we urge the Commission to take decisive and immediate action to extend this ban to all PFAS pesticides in the European Union.

Currently, 34 PFAS pesticides are approved for use within the EU. These substances contain a -CF3 group that breaks down into trifluoroacetic acid (TFA), which is an exceptionally persistent and harmful "forever chemical" detected extensively in drinking water and human blood across Europe. Scientific studies have identified TFA as a planetary boundary threat, highlighting its escalating global exposure and the potential for irreversible impacts². Furthermore, TFA exposure has been associated with severe health risks, including potential harm to fertility and child development ³.

The continued use of PFAS pesticides not only endangers public health but also undermines the EU's environmental commitments. As a highly persistent substance, TFA resists natural degradation, accumulating in ecosystems over time, especially in water systems, from surface and groundwater to drinking water sources and even deep aquifers supplying pristine mineral water. This poses serious long-term threats to biodiversity and ecosystem integrity.

The EU Pesticide Regulation (1107/2009), on the precautionary principle, sets strict approval criteria to protect groundwater and drinking water from pesticide pollution. Yet, TFA contamination frequently exceeds the regulatory limit of 0.1 μ g/L for relevant metabolites in groundwater and has been recorded at levels surpassing even the 10 μ g/L threshold for non-

¹ Standing Committee on Plants, Animals, Food and Feed Section Phytopharmaceuticals - Legislation 4 - 5 December 2024 [link].

² Arp HPH, Gredelj A, Glüge J, Scheringer M, Cousins IT. The Global Threat from the Irreversible Accumulation of Trifluoroacetic Acid (TFA). Environ Sci Technol. 2024 Nov 12;58(45):19925-19935. doi: 10.1021/acs.est.4c06189. Epub 2024 Oct 30. PMID: 39475534; PMCID: PMC11562725

³ Zou R, Labrecque JA, Swanson SA, Steegers EAP, White T, El Marroun H, Tiemeier H. Prenatal exposure to trans fatty acids and head growth in fetal life and childhood: triangulating confounder-adjustment and instrumental variable approaches. Eur J Epidemiol. 2022 Nov;37(11):1171-1180.

relevant metabolites ⁴. This alarming level of pollution compromises the safety of drinking water and contradicts the EU's legal requirements and environmental objectives.

To address this urgent issue, we respectfully call on the Commission to:

- Extend the ban to all PFAS pesticides: propose the non-renewal and withdrawal of the 34 PFAS pesticides approved in the EU as soon as possible.
- **Reject new applications:** reject any approval for new PFAS pesticide active substances in the EU;
- Regulate PFAS co-formulants: classify PFAS co-formulants as unacceptable for use in pesticide products.

The overwhelming scientific evidence unequivocally demonstrates the toxicity of PFAS pesticides and their incompatibility with the EU's goals of reducing chemical pollution and safeguarding natural resources. Permitting their continued use of these substances threatens public health, our food systems, and the environment, pushing us perilously close to planetary boundaries.

PFAS pesticides are a significant, preventable source of this pollution. We trust that the Commission will prioritise the protection of EU citizens and ecosystems and reaffirm its leadership in addressing chemical pollution. We stand ready to support the Commission in advancing this critical initiative.

Thank you for your attention to this urgent matter.

Sincerely,

Cristina Guarda (Greens/EFA, IT) Sigrid Friis (Renew, DK)

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⁴ Part B of Annex I of Directive 2020/2184.

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