



May 30th 2024

**Council of the European Union**

Deputy Permanent Representatives of the  
Governments of the Member States to the European Union

Cc:

**Council of the European Union**

Environmental attachés

**European Commission**

Mr Virginijus Sinkevičius  
Commissioner for Environment, Oceans and Fisheries  
Directorate-General for Environment

M. Florika Fink-Hooijer  
Director-General  
Directorate-General for Environment

**European Parliament**

Mr Milan Brglez  
Rapporteur Member of the European Parliament  
Committee on the Environment, Public Health and Food Safety

**Subject:** Urgent request to include Trifluoroacetic Acid (TFA) as a priority substance under the Water Framework Directive (WD) - Working Party on the Environment, 31 May 2024

Dear Deputy Permanent Representatives,

We, the undersigned coalition of NGOs from the Pesticide Action Network Europe (PAN Europe), are writing to draw your attention to the [concerning findings](#) from our survey on water contamination by trifluoroacetic acid (TFA) across ten EU countries. Our report, published on May 27, 2024, highlights alarming levels of TFA, a highly persistent and widely unregulated 'forever chemical', in both surface and groundwater samples.

Our key findings are as follows:

1. Widespread contamination beyond industrial hotspots: all water samples analysed contained TFA.
2. High concentration levels: detected TFA levels ranged from 370 ng/l to 3,300 ng/l, with an average of 1,180 ng/l.
3. Exceedance of limits: 79% of the samples had TFA levels exceeding the EU Drinking Water Directive limit of 500 ng/l for total PFAS.
4. Of particular note is that groundwater appears to be polluted to a similar extent as surface waters, which raises concerns about the protection of European drinking water resources for future generations.
5. A series of samples containing high TFA concentrations were taken in water courses running exclusively through agricultural areas.

PFAS pesticides appear to be the primary source of TFA contamination in rural areas, followed by refrigerants, sewage treatment, and industrial pollution.

The persistence, mobility, and solubility of TFA make it an exceptionally problematic and stable contaminant. This leads TFA to accumulate in water bodies and remain for centuries or more, posing a long-term risk to environmental and human health. This claim is all the more valid since the German authorities recently announced their intention to propose the classification of TFA as 'toxic for reproduction' category 1B based on studies reporting malformations in offspring. Moreover, TFA is classified as harmful to aquatic life with long lasting effects (H412).

This, together with the fact that TFA may be the largest currently known contaminant of European waters with a man-made pollutant, calls for immediate action to mitigate its impact and safeguard our water resources and protect human health.

**We urgently call for TFA to be included as a priority substance for surface waters, ensuring limit values and monitoring obligations for TFA.**

**Moreover, we respectfully ask you to support the European Parliament's proposal to develop an Environmental Quality Standard for 'PFAS total', with the aim to use it as a supplement to the sum of PFAS parameter.**

We appreciate your attention to this urgent matter and look forward to your prompt response.

Yours sincerely,

Martin Dermine  
Executive Director  
Pesticide Action Network Europe

On the behalf of:

Ecologistas en Acción (Spain)  
Earth Trek (Croatia)  
Génération Futures (France)  
Global 2000 - Friends of the Earth Austria (Austria)  
Mouvement écologique (Luxembourg)  
Nature & Progrès Belgique (Belgium)  
Pesticide Action Network Germany (Germany)  
Pesticide Action Network Netherlands (the Netherlands)  
Swedish Society for Nature Conservation (Sweden)  
Via Pontica Foundation (Bulgaria)