Pesticide Action Network Europe

To: Presidency of the European Council and Permanent Representatives of the Governments of the Member States to the European Union

Brussels, 12 September 2025

Subject: Urgent need for regulation of trifluoroacetic acid (TFA) in surface and groundwater

Dear Presidency, dear Permanent Representatives to the EU,

PAN Europe is writing to you ahead of the interinstitutional technical meeting on 15 September 2025, to urge the **incorporation of trifluoroacetic acid (TFA) into the "sum of 24 PFAS" Environmental Quality Standards (EQS) for surface water and groundwater**, as explicitly recommended by the Scientific Committee on Health, Environmental and Emerging Risks (SCHEER).

TFA, the ultrashort-chain degradation product of many PFAS pesticides and other PFAS, is now recognised as the most abundant PFAS in the environment and a threat to our planetary boundaries. Scientific evidence shows that PFAS pesticides are the primary source of TFA contamination in agriculture, responsible for up to 76% of groundwater pollution[1]. Highly soluble and extremely mobile, TFA readily accumulates in surface waters, groundwater, crops, and ultimately food chains.

Recent analyses by PAN Europe and its members found TFA in all surface and groundwater samples tested across 10 EU Member States, accounting for more than 98% of total PFAS detected. Further surveys confirmed TFA's widespread presence in tap water, bottled mineral water, and even European wines, where concentrations reached several hundred micrograms per litre, orders of magnitude higher than background levels in water. Because conventional water treatments cannot remove TFA, this contamination threatens the safety of Europe's water and food systems while shifting an enormous financial burden onto society. The remediation of

[1] Report by German Environment Agency, 2023 (UBA-FB) FB001274/ENG.
Based on Table 6 on page 51, the theoretical release of TFA attributed to pesticides is 434 tonnes. When considering the total theoretical TFA release from all sources (434 + 22 + 19 + 96 = 571 tonnes), pesticides account for approximately 76% of the total.

ultra-short PFAS like TFA is estimated at over €100 billion annually for Europe's water and soil, reducing water quality and generating large volumes of wastewater.

At the same time, emerging toxicological evidence highlights TFA's hazardous properties. It has been proposed for classification as toxic to reproduction (category 1B), acutely toxic (category 3), very persistent and very mobile (vPvM), and persistent, mobile and toxic (PMT). Prenatal exposure has been linked to severe developmental defects in animal studies, alongside toxicity to reproduction and consistent findings on liver toxicity across the different studies.

Alarmingly, TFA remains unregulated under EU water law. The ongoing revision of the Water Framework Directive (WFD) and its daughter Directives provides a critical opportunity to close this gap.

We therefore urge the Council to ensure that TFA is incorporated into the EQS for PFAS in surface water and groundwater, in line with SCHEER's recommendations, and to act decisively to prevent further irreversible contamination of Europe's water resources. Failure to do so would be a substantial missed opportunity, as the next round of pollutants' update under the WFD will not occur for several years, and TFA pollution will persist in endangering groundwater resources.

We thank you for your attention to this urgent matter and remain at your disposal for further dialogue.

Yours sincerely,

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