

To:

Mr. Magnus Johannes Heunicke, Minister for Environment and Gender Equality and Chair of the Environment Council

Environment Ministers of EU Member States

Member of the European Parliament Javier Lopez, Rapporteur on the update of the WFD (2022/0344(COD))

Cc:

Members of the European Parliament Hildegard Bentele, Michal Wiezik, Kai Tegethoff, Per Clausen, Pietro Fiocchi

Brussels, 18 September 2025

Subject: Urgent call to regulate TFA pollution in surface water and groundwater under the Water Framework Directive (WFD)

Dear Chair of the Environment Council, Dear Ministers for Environment, Dear Rapporteur,

We, the 30 undersigned organisations committed to protecting human health and the environment from pollution, call upon you to take responsibility for protecting Europe's citizens and water resources from the growing threat of trifluoroacetic acid (TFA). This highly mobile, persistent and toxic 'forever chemical' has become a widespread pollutant.

The final trilogue on the update of water pollution standards for the EU on 23 September represents a decisive opportunity to incorporate TFA into the 'Sum of Per- and polyfluoroalkyl substances (PFAS)' parameter for surface water and groundwater suggested by the European Commission (0.0044 μ g/L, expressed as PFOA-equivalents).

TFA is the most widespread PFAS in Europe. This ultrashort-chain degradation product of <u>PFAS</u> <u>pesticides</u> and other PFAS readily <u>accumulates</u> in surface waters, groundwater, crops, and ultimately food chains. Meanwhile, <u>toxicological evidence</u> shows that TFA is persistent, toxic, and harmful to reproduction for humans. It is considered a threat to our <u>planetary boundaries</u>.

This contamination is jeopardising the safety of Europe's water and food systems since conventional water treatments cannot remove TFA. The remediation of 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. Without strong regulatory measures, this burden will fall on citizens and public authorities rather than on polluters.

TFA remains unregulated under EU water law. The ongoing revision of the WFD and its daughter Directives provides a critical opportunity to close this gap. The Scientific Committee on Health, Environmental and Emerging Risks (SCHEER) has already <u>recommended</u> that TFA be included in the EQS for 'Sum of PFAS'.

We therefore urge the Council and the European Parliament to act on this recommendation and to demonstrate clear political responsibility by ensuring that TFA is regulated without delay.

Failure to seize this opportunity would mean several more years of uncontrolled contamination, during which surface water and groundwater resources and future generations will remain at risk.

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

Yours sincerely,

Angeliki Lysimachou Head of Science and Policy Pesticide Action Network Europe

On behalf of (by alphabetical order):

Agrolink Association (Bulgaria)
Armenian Women For Health and Healthy Environment
ÄrztInnen für eine gesunde Umwelt (ISDE Austria)
CGIL Veneto - Workers' Union (Italy)
Cittadini per la Legalità, il Lavoro, la Salute e l'Ambiente (Italy)
Corporate Europe Observatory
Deutsche Umwelthilfe e.V. (Germany)
Eco Hvar (Croatia)
Ecologistas en Acción (Spain)
Environmental Coalition on Standards
European Environmental Bureau
Fidra (UK)

Générations Futures (France)

Green Transition Denmark

Health and Environment Alliance

Hogar sin Tóxicos (Spain)

Il Mondo di Irene (Italia)

Interessengemeinschaft NO PFAS Manching e. V. (Germany)

ISDE, International Society of Doctors for Environment (Italy)

Mamme NO PFAS (Italy)

Medicina Democratica (Italy)

Nature & Progrès Belgique

Pesticide Action Network Germany

Pesticide Action Network Netherlands

Pesticide Action Network UK

Rete Zero PFAS Italia

Romapis, the Federation of the Romanian Beekeeping Associations (Romania)

Via Pontica Foundation (Bulgaria)

Women Engage for a Common Future

























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