Pesticide Action Network Europe

To: Members of the SCoPAFF - Section "Phytopharmaceuticals - Legislation"

Brussels, 18 September 2026

Subject: EU Standing Committee on Plants, Animals, Food and Feed (SCoPAFF); 24-25 September; position of Pesticide Action Network (PAN) Europe

Dear Members of the Standing Committee on Plants, Animals, Food and Feed,

On 24-25 September, you are invited to the EU Standing Committee on Plants, Animals, Food and Feed to discuss and potentially adopt opinions on several European Commission proposals. Ahead of this meeting, we would like to share PAN Europe's position on key issues concerning human health and environmental protection from pesticides. We kindly request that you give these matters your careful attention.

Agenda issues

1. Exchange of views and possible opinion of the Committee on:
    a. a draft Commission Regulation (EU) amending Commission Regulation (EU) No 283/2013 as regards the information to be submitted for active substances (B.02)
    b. a draft Commission Regulation (EU) amending Commission Regulation (EU) No 284/2013 as regards the information to be submitted for plant protection products (B.03)
    c. a draft Commission Regulation (EU) amending Commission Regulation (EU) No 546/2011 as regards uniform principles for evaluation and authorisation of plant protection products with regard to birds, mammals, bees and drinking water (B.04)
2. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **buprofezin** (B.05) - **support**
3. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **flutolanil** (C.01) - **support**
4. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **pirimicarb** (C.02) - **support**
5. Draft Commission Implementing Regulation (EU) approving **pydiflumetofen** as a candidate for substitution (C.03) - **oppose**

6. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **triclopyr** (C.04) - **support**
7. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **cyprodinil** (C.05) - **support**
8. Draft Commission Implementing Regulation (EU) concerning the non-approval of the active substance **benzobicyclon** (C.06) - **support**
9. Draft Commission Implementing Regulation (EU) concerning the non-approval of the active substance **fludioxonil** (C.07) - **support**
10. Article 21. Flupyradifurone (update) (A11.1)

1.
    a. Draft Commission Regulation (EU) amending Commission Regulation (EU) No 283/2013 as regards the information to be submitted for **active substances** (B.02)
    b. Draft Commission Regulation (EU) amending Commission Regulation (EU) No 284/2013 as regards the information to be submitted for **plant protection products** (B.03)
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In September 2025, the Commission launched a public consultation on proposed amendments also incorporating the revised EFSA Bee Guidance Document (2023) into the regulations governing data requirements and evaluation principles for active substances and plant protection products. The consultation closed on 9 October 2025.

Almost a year has passed and the corresponding regulatory procedure with scrutiny - originally scheduled for 2025 - has yet to take place at SCoPAFF level, having been postponed on at least three consecutive occasions. At each of the Committee's meetings on 10-11 March, 5-6 May, and 30 June 2026, the Commission cited its inability to finalize internal procedures in time and expressed hope of scheduling a vote at the following meeting; a vote is now anticipated for 25 September 2026.

PAN Europe is deeply concerned by these repeated postponements and urge that the regulatory procedure with scrutiny be concluded without further delay. The EU is lacking an up-to-date, harmonized risk assessment scheme for bees for many years now, making the adoption of the 2023 Bee Guidance Document a matter of genuine urgency.

We would further note that this urgency has been explicitly acknowledged by the Commission itself. The 2023 "New Deal for Pollinators," in line with Parliament's resolution on this matter, identified the endorsement of the revised Bee Guidance Document as a priority action to be completed by 2024 (Annex – New Action Framework, Priority II, Action 6.4). We note that this deadline has since elapsed.

We call on you to ensure the conclusion of internal **procedures** and the adoption of the draft Commission Regulations 283/2013, 284/2013 and 546/2011

2. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **buprofezin** (B.05)

PAN Europe welcomes the Commission's decision to hold a vote on the proposal for the non-renewal of the approval of buprofezin during this meeting and calls Member State representatives to vote in favour of the proposal. Buprofezin has been identified as meeting the endocrine disruption (ED) criteria for humans, in accordance with point 3.6.5 of Annex II to Regulation (EC) No 1107/2009. The substance was found to disrupt the Hypothalamic-Pituitary-Thyroid (HPT) axis, causing adverse effects on the thyroid, including alterations in thyroid weight and histopathology. As substances that alter thyroid function may result in neurodevelopmental toxicity and affect the developing foetus, the use of buprofezin should stop immediately.

We call on you to **support** the Commission's proposal for **non-renewal of buprofezin.**

3. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **flutolanil** (C.01))

PAN Europe criticises the lack of meaningful progress on the proposal for the non-renewal of flutolanil after more than a year. The proposal should already have been adopted. Flutolanil meets the OECD definition of PFAS because it contains a trifluoromethyl group (-CF_3) bound to a carbon atom. It has also been identified by EFSA as persistent (P) to very persistent (vP).

Due to its molecular structure, and as confirmed by EFSA, flutolanil breaks down into trifluoroacetic acid (TFA), contaminating crops, soil and water resources. TFA is an ultra-short PFAS, highly persistent, mobile, and soluble in water. Its **harmonised classification as Persistent, Mobile and Toxic (PMT), very Persistent very Mobile (vPvM) and toxic for reproduction category 1B has now been confirmed** by the Risk Assessment Committee (RAC) of ECHA. The latter classification is based on evidence of clear developmental toxicity, including skeletal and eye malformations in rabbit offspring. TFA also lowers sperm quality and impacts the thyroid hormone system in rats.

This results in TFA being a 'relevant' metabolite, according to Article 3, point 32 of Regulation (EC) No 1107/2009, which means the 0.1 µg/L groundwater limit applies. Alarmingly, TFA

contamination in groundwater routinely exceeds this limit for relevant metabolites[1] and, in some cases, surpasses even the 10 µg/L threshold for non-relevant metabolites in groundwater[2]. A recent study by Diehle *et al.* has provided the first quantitative estimation of TFA emissions leaching into groundwater as a direct result of crop applications of 24 EU-approved PFAS pesticides, including flutolanil. For flutolanil, when representative uses on flowers and potatoes were considered, the resulting TFA leaching potential was estimated to be high (≥ 10 µg/L) according to the FOCUS modeling approach.

According to recent scientific warnings, TFA poses a serious threat to planetary boundaries, as most of the TFA released today will persist in the environment for future generations. Continued use of TFA-emitting substances will lead to the accumulation of this truly forever chemical in our environment. This constitutes a clear indication of a violation of the Pesticide Regulation (EC) 1107/2009, namely its Article 4(3), stating pesticides shall have no immediate or delayed effects on human health, directly or through drinking water, or on groundwater. TFA-emitting substances, including flutolanil, constitute a clear risk for citizens and groundwater and should be banned.

We call on you to **support** the Commission's proposal for **non-renewal of flutolanil.**

4. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **pirimicarb** (C.02)

PAN Europe welcomes the proposal for non-renewal of the approval of pirimicarb. Pirimicarb has been approved as a candidate for substitution, as it meets two of the criteria for being Persistent, Bioaccumulative and Toxic (PBT). In addition, it is classified as Carcinogen Category 2 and is very toxic to aquatic life. Due to these serious concerns, pirimicarb has been included in PAN Europe's list of the "Toxic 12" pesticides identified for immediate ban since 2021.

In its peer-review conclusions published in September 2024, EFSA confirmed that pirimicarb clearly does not meet the approval criteria laid down in Regulation (EC) No 1107/2009. EFSA concluded that exposure estimates for residents and bystanders are above AAOEL, for all representative uses (in field and greenhouses), even when available mitigation measures are applied. It also identified as a critical area of concern the high risk to aquatic organisms in the majority of assessed scenarios, even when maximum risk mitigation measures were applied, and for all representative uses.

Furthermore, EFSA identified several issues that could not be finalised. The phototoxicity and photomutagenicity potential of pirimicarb could not be excluded. Its developmental neurotoxicity potential has not been adequately addressed. In addition, the consumer risk assessment could not be finalised. Significant data gaps also remain regarding risks to honey bees and other non-target organisms, including soil-dwelling organisms. Moreover, no conclusion could be

[1] Austria, Denmark
[2] Germany, Sweden, Switzerland.

drawn as to whether pirimicarb meets the criteria for endocrine disruption for non-target organisms.

Taken together, these findings demonstrate that pirimicarb poses unacceptable risks to the environment and potentially to human health. This is in clear contradiction with Article 4 of Regulation (EC) No 1107/2009, which requires that active substances shall have no harmful effects on human health or on the environment.

We call on you to **support** the Commission's proposal for **non-renewal of pirimicarb .**

5. Draft Commission Implementing Regulation (EU) approving **pydiflumetofen** as a candidate for substitution (C.03)

PAN Europe calls on the Member States to oppose the approval of pydiflumetofen, a succinate dehydrogenase inhibitor (SDHI) fungicide, on the grounds of its very high persistence in the environment, posing a high risk for soil, surface water and groundwater contamination, which constitutes an unacceptable effect in itself. This position is fully aligned with growing scientific consensus that persistence alone is sufficient to justify regulatory action, as such highly persistent substances inevitably accumulate in the environment and water systems, leading to long-term and potentially irreversible impacts on human health and ecosystems. Allowing the approval of such substances directly contradicts the preventive and precautionary principles underpinning EU pesticide legislation.

We call on you to **reject** the Commission's proposal for approval of pydiflumetofen.

6. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **triclopyr** (C.04)

PAN Europe reiterates its support for the proposal for non-renewal of the approval of triclopyr. In its peer review conclusions published in July 2024, EFSA identified several critical areas of concern for triclopyr. These consist of a high acute and long-term risk to mammals and a high risk to non-target arthropods.

EFSA also highlighted issues that could not be finalised. Toxicity data necessary to assess risks to aquatic organisms are lacking. Importantly, no safe uses were identified in relation to the exposure of residential children when using the EFSA exposure model, even after applying available risk mitigation measures. Additional data gaps further prevent a comprehensive evaluation of the risks.

These findings indicate that triclopyr poses unacceptable risks to human health and the environment. Its continued approval would therefore be inconsistent with Article 4 of Regulation (EC) No 1107/2009, which requires that active substances must not have harmful effects on human health or the environment.

We call on you to **support** the Commission's proposal for **non-renewal of triclopyr.**

7. Draft Commission Implementing Regulation (EU) concerning the non-renewal of the approval of the active substance **cyprodinil** (C.05)

PAN Europe supports the long-awaited proposal for non-renewal of cyprodinil. The proposal is in line with Article 4(1) and points 3.6.5 and 3.8.2 of Annex II to Regulation (EC) No 1107/2009. Indeed, cyprodinil meets the endocrine disruption criteria for the EAS-modalities for humans and wild mammals and other non-target organisms. The substance leads to clear endocrine-mediated effects on both female and male reproductive health. For humans, cyprodinil was found to induce delayed sexual maturation and decrease ano-genital distance (AGD). This conclusion is considered relevant for wild mammals based on the observed adverse effects on reproductive performance. In fish, cyprodinil increased male vitellogenin levels, resulting in changes in female gonad histology and decreased fecundity and fertilisation success. Moreover, negligible exposure to cyprodinil for humans and non-target organisms was not demonstrated, and the application for an approval by derogation under Article 4(7) was submitted outside the regulatory timeline foreseen in Article 13(5) of Regulation (EU) No 844/2012. There is therefore no legal basis for a renewal.

Our analysis of locally produced strawberries from 11 EU countries found cyprodinil in 33% of samples, making it the second most frequently detected substance, after the endocrine disruptor fludioxonil.

In addition to the endocrine-disrupting properties of the substance, EFSA identified two other critical areas of concern precluding the renewal of cyprodinil: no safe use exists due to a high long-term risk to mammals and a high risk to aquatic organisms.

We call on you to **support** the Commission's proposal for **non-renewal of cyprodinil.**

8. Draft Commission Implementing Regulation (EU) concerning the non-approval of the active substance **benzobicyclon** (C.06)

PAN Europe supports the proposal for non-renewal of benzobicyclon, particularly in light of the harmful properties of one of the substance metabolites (1315P-070), in relation to which EFSA identified three critical areas of concern. The predicted exposure estimate to this metabolite is above the AOEL for workers and residents, even when applying all possible risk mitigation measures. Moreover, it poses a high long-term risk both to mammals and to aquatic organisms.

These findings indicate that benzobicyclon poses unacceptable risks to human health and the environment. Its non-renewal is aligned with Article 4 of Regulation (EC) No 1107/2009, which

requires that active substances must not have harmful effects on human health or the environment.

We call on you to **support** the Commission's proposal for **non-renewal of benzobicyclon.**

9. Draft Commission Implementing Regulation (EU) concerning the non-approval of the active substance **fludioxonil** (C.07)

PAN Europe welcomes the long-awaited proposal for non renewal of fludioxonil, two years after EFSA concluded the substance meets the endocrine disruption criteria for the EAS-modalities for human health and non-target organisms. Fludioxonil was found to decrease testosterone synthesis and increase estradiol, leading to delayed sexual maturation, decreased anogenital distance in males and increased oestrus cycle in females. These conclusions for humans also apply to wild mammals as non-target organisms. Article 4 and points 3.6.5 and 3.8.2 of Annex II of the Pesticide Regulation clearly provide that active substances having endocrine-disrupting properties cannot be approved.

Furthermore, fludioxonil meets the OECD definition of PFAS and was found to be very persistent, raising further concerns about its long-term impact on human health and the environment.

Worryingly, fludioxonil was the most frequently detected candidate for substitution substance in European fruit between 2009 and 2019, according to data from the EU Multiannual Control Programme analysed by PAN Europe. The widespread European consumers' exposure to this hazardous chemical as confirmed by our recent testings, with **fludioxonil being detected in nearly 40% of the apple samples and 39% of strawberry samples.**

In light of the above, and given that the substance should have been banned since it was identified as an endocrine disruptor two years ago, we urge you not to grant a grace period and to withdraw products containing fludioxonil from the market immediately.

We call on you to **support the non-renewal of fludioxonil without further delay.**

10. Article 21 procedure on flupyradifurone (A11)

PAN Europe would like to emphasize the need to take regulatory measures to protect bees against the risks posed by flupyradifurone. In particular, considering the conclusions of the Rapporteur Member State (Greece) on the scientific information provided by the applicant (no safe outdoor use), PAN Europe asks the Committee to activate article 69 from the Regulation (EC) 1107/2009, and suspend all outdoor uses of the substance.

PAN Europe would also like to highlight that regulatory measures concerning Maximum Residues Levels (MRLs) should be aligned with the ongoing Article 21 procedure on the substance. It is therefore unacceptable that the Commission and the PAFF Committee (residues) endorsed an increase in MRL in rapeseed, neglecting the fact that rapeseed flowers are extremely attractive for bees, which was recently vetoed by the European Parliament. The work from both legislation and residue committees should be more aligned.

Thank you for your consideration.

Sincerely yours,

On behalf of PAN Europe

Angeliki Lysimachou
Head of Science and Policy