

Guilhem de Seze Head of Risk Assessment Production Department Via Carlo Magno, 1A, 43126 Parma, Italy Cc: Manuela Tiramani, Head of Pesticides Peer Review Unit

25th April 2025

Dear Guilhem de Seze,

I am writing as a follow up to the exchange we started last year on PFAS pesticides (ref. letter from 25th July 2024) to share with you our latest report, '**Message from the Bottle**', which reveals alarming levels of trifluoroacetic acid (TFA) in European wines. These findings highlight the need for comprehensive monitoring of TFA in food products and a precautionary regulatory approach that acknowledges the significant toxicological data gaps, different routes and sources of exposure and potential risks to public health, including children.

Our report consisted of an analysis of 49 European wines originating from 10 European countries. Together with our member organisations, we analysed 10 aged wines from vintages ranging from 1974 to 2015 and 39 recent wines (2021-2024). While most of the selected wines were from conventional productions, we also included 5 organic wines.

Alarmingly, we found TFA in 100% of the 39 recent wine samples, with levels reaching up to 320 μ g/L, a median concentration of 110 μ g/L, and an average concentration of 122 μ g/L. This is nearly 100 times higher than the average concentrations we found in <u>surface</u> and <u>drinking</u> <u>water</u>. In contrast, no TFA was detected in pre-1988 vintage wines, and a sharp increase in contamination has been observed since 2010. In parallel, 18 pesticides were detectable in all tested wines, including two PFAS fungicides, fluopyram and fluopicolide. The wines in the upper half of the TFA concentration range (mean: 176 μ g/L) showed, on average, twice the pesticide load compared to those in the lower half (mean: 58 μ g/L). This indicates a correlation between TFA levels and pesticide use.

Independently of our report, Professor Michael Müller from the University of Freiburg observed similar trends in his own analyses of TFA in both aged and recent wines. In the most recent wines, he noted a wide range of TFA contamination, from 20 to over $300 \mu g/L$. The lowest levels were found in organically produced wines, made from grapes grown on land that has been free from chemical inputs for decades. Our findings also align with the 2017 study carried out by the

EU Reference Laboratory CVUA Stuttgart on behalf of the European Commission. At that time, the 27 analysed European wines showed a median concentration of 50 μ g/L, with a peak value of 120 μ g/L.

These levels are particularly alarming. The average TFA concentration of 122 μ g/L found in the 39 recent wines largely exceeds the existing guidance values for drinking water, including the German value of 60 μ g/L. These results also indicate that consumer dietary exposure to TFA comes from multiple sources (from water, food products, and other drinks).

PFAS pesticides are a direct source of this TFA contamination. First, over 30 PFAS active substances are approved for use in EU agriculture, directly contributing to contamination of crops. Secondly, <u>scientific analysis</u> indicates that PFAS pesticides contribute up to 76% of total TFA groundwater pollution, compared to 17% from atmospheric sources and 6% from wastewater and manure combined.

We therefore urge EFSA to carry out a comprehensive monitoring of TFA in food products. Furthermore, particularly in the context of EFSA's review of TFA toxicological reference value, we urge you to adopt a precautionary regulatory approach that acknowledges the significant toxicological data gaps and takes into account the different sources of consumer exposure (i.e. food, drinks, water) and the overall potential risks to public health, including children.

Thank you for your attention to this urgent matter.

Sincerely yours,

Angeliki Lysimachou Head of Science and Policy Pesticide Action Network Europe

Learn more:

<u>Report</u>, Message from the bottle: the rapid rise of TFA contamination across the EU <u>Press release</u>, Study reveals alarming surge of forever chemical TFA in European Wine