



To:

Commissioner for Health and Food Safety
Ms. Stella Kyriakides

Cc:

Commissioner for Environment, Oceans and Fisheries
Mr. Virginijus Sinkevičius

Commissioner of Internal Market
Mr Thierry Breton

European Commission
Rue de la Loi / Wetstraat 20
1049 Brussels-Belgium

Brussels, 28/02/2024

Subject: European citizens face increasing exposure to cocktails of PFAS pesticides through their food - Urgent call to ban PFAS pesticides in the European Union (UE)

Dear Commissioner Kyriakides,

With this letter, PAN Europe would like to bring to your attention the concerning findings of our report about PFAS pesticides in EU food 'Toxic Harvest: the rise of forever pesticides in fruit and vegetables in Europe' published yesterday. We urge you to take immediate action to address this source of PFAS exposure safeguarding the health of citizens and our environment.

The report examined the presence of PFAS pesticides in fruit and vegetables grown in the EU and those imported into the EU over the decade from 2011 to 2021. Alarmingly, this investigation -based on official data from the EU Member State monitoring programmes for pesticide residues in food- reveals an increasing exposure of European consumers to PFAS pesticides.

Key findings of the study include:

- Residues of 31 different approved PFAS pesticides were detected in fruit and vegetables in the EU between 2011 and 2021;
- The number of fruit and vegetables containing residues of at least one PFAS pesticide in the EU has tripled in 10 years;
- In 2021, European-grown fruits such as strawberries (37%), peaches (35%) and apricots (31%) were particularly contaminated, often containing cocktails of three to four different PFAS in a single fruit;
- The Netherlands, Belgium, Austria, Spain, Portugal and Greece are the leader producers of PFAS-contaminated food within the EU, while countries such as Costa Rica, India and South Africa are for the EU the main exporters of high-PFAS laden food.

The findings raise serious environmental and human health concerns. PFAS pesticides are deliberately sprayed on crops making food consumption a direct and systematic route of exposure to PFAS for EU consumers.

PFAS active substances belong to a PFAS sub-group containing at least one -CF₃ group, which has been deliberately introduced to pesticide substances during their design to increase their stability and effectiveness. As a result, they are persistent themselves or break down into persistent metabolites including the very persistent and very mobile trifluoroacetic acid (TFA). Spraying our field crops with PFAS pesticides not only contributes to the widespread environmental PFAS contamination in Europe, including our water resources, but also leads to increased residues of PFAS pesticides in our food. This is unacceptable given that these synthetic pesticides are also toxic by design to exert their pesticidal action.

The EU Pesticides Regulation (EC) 1107/2009 aims to ensure that active substances (or products and their residues) placed on the market do not adversely affect human or animal health or the environment. Yet, 37 active substances that are PFAS are currently approved in the EU, according to the official list provided in the PFAS restriction proposal. These account for 16% of the synthetic active substances approved for use in conventional farming within the EU, representing a significant proportion. This also indicates that other non-PFAS pesticides are available, making their use completely unnecessary.

An earlier report by PAN Europe and Générations Futures¹ demonstrated that PFAS pesticide substances are in fact not adequately regulated by the Pesticides Regulation. This is because of poor implementation of the Law's provisions and lack of regulation of "persistence" of active substances and that of their metabolites. It was concluded that, unless urgent additional action is undertaken, the current pesticide risk assessment procedure will not lead to the phase-out of PFAS pesticides in line with the EU pledge to ban all unnecessary PFAS in the framework of the EU Chemical Strategy for Sustainability.

¹ [PAN Europe, Générations Futures, Europe's Toxic Harvest: unmasking PFAS Pesticides authorised in Europe, November 2023.](#)

Our current report confirms these previous findings. By zooming in on the top 10 most detected PFAS substances in fruit and vegetables, there is evidence of their persistence or that of their metabolites (incl. TFA), along with their known or potential toxicity to human health. Namely, the evidence points at acknowledged and/or unaddressed concerns with regard to harm to unborn children, brain damage, disruption of the endocrine system and cancer risk. Additionally, potential adverse effects such as impact on the immune system or the nervous system, particularly during early development, and the risks posed by mixtures or chronic exposure are either poorly investigated or not investigated at all. Despite these findings, these substances have been approved for use in the EU. Moreover, the Maximum Residue Limits (MRLs) in food products were set without taking into consideration the mixture effects and therefore fall short to ensure consumers' safety. According to our report three or four different PFAS pesticides may be detected in a single fruit (e.g. strawberries).

We urge you to take immediate action to protect Europeans and the environment from the harmful effects of PFAS contamination by:

1. Banning PFAS active substances in pesticides:

- Considering persistence of an active substance or that of its metabolites as an unacceptable effect for the environment, in light of the intrinsic toxic properties of synthetic active substances and the cumulative nature of the PFAS pollution.
- Revising Annex II of the Pesticide Regulation to ban Persistent, Mobile and Toxic (PMT) and very Persistent and very Mobile (vPvM) active substances.
- Improving the implementation of the EU Pesticide Regulation to ensure a high level of protection for humans, animals, and the environment.
- Banning the manufacture (and in turn export) as well as the import of PFAS pesticides by including active substances in the scope of the proposal for a PFAS restriction.

2. Applying a zero-residue policy in food by reducing MRLs for PFAS active substances to protect consumers and farm animals, and address mixtures. This must also apply to EU-imported food and feed products .

3. Moving towards pesticide-free agriculture by supporting the transition towards resilient food systems that prioritize nature-based alternatives to synthetic pesticides, including PFAS pesticides, in line with the European Green Deal and citizens' preferences.

Please find attached our technical report and our policy briefing, which includes a brief analysis of the top 10 PFAS pesticides and our policy demands. We also provide the links below.

Thank you for your attention to this critical matter. We look forward to your prompt action on this urgent issue.

Sincerely yours,

On behalf of PAN Europe

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[Link Technical Report](#)

[Link Policy Briefing](#)