



To:

Ms. Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Ms. Paulina Hennig-Kloska, Polish Minister for Climate and Environment & chair of the Environment Council

MEP Javier Lopez, Rapporteur on the update of the WFD (2022/0344(COD))

CC:

Patrick Child, acting Director-General of DG ENV

Mr. Arkadiusz Pluciński, Minister-Counsellor, Polish Representative to COREPER I

Ms. Claudia Olazábal, Head of Sustainable Freshwater Management Unit at DG ENV

MEPs Hildegard Bentele, Michal Wiezik, Kai Tegethoff, Per Clausen, Pietro Fiocchi

Subject: Adoption of the Scientific Committee on Health, Environmental and Emerging Risks on PFAS and TFA

22 May 2025

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

We, the undersigned civil society organisations working together to phase out the use of harmful pesticides in agriculture, are writing to you urging you to take stronger action to protect European's water resources from per- and polyfluoroalkyl substances (PFAS) - and especially trifluoroacetic acid (TFA) a common and very persistent metabolite of PFAS pesticides.

This letter follows the recent European Parliament's adoption of the European Water Resilience Strategy's report, recognising the growing concern over pesticide and PFAS pollution, including TFA, highlighting once again the urgent need to take protective measures.

In this regard, we would like to draw your attention to the recent conclusions of the Scientific Committee on Health, Environmental and Emerging Risks (SCHEER) regarding Environmental Quality Standards (EQS) for total PFAS and TFA, published as part of the ongoing revision of the

Water Framework Directive (WFD) and its daughter Directives (EQS and Groundwater Directives).

While the Commission's 2022 WFD proposal included EQS for the 'sum of 24 PFAS' in surface water and groundwater¹, there was no broader EQS for 'PFAS total'. In response to the increasing knowledge of the persistence and toxicity of PFAS, the European Parliament proposed including 'PFAS total'², and the Joint Research Centre (JRC) developed an EQS proposal. In April 2025, SCHEER published its conclusions on this proposal³ and concluded that the current **sum of 24 PFAS is not sufficiently protective**⁴ and recommended expanding the approach to cover 100 individual PFAS, using the same Relative Potency Factor (RPF) method. It also advised adding TFA to the current list of 24 PFAS.

This action is urgent. According to the European Environment Agency's *State of Water* report⁵, less than 30% of surface waters meet good chemical status, and toxic chemicals are even reaching groundwater. Pesticide use in agriculture is a significant source of this pollution. Yet nearly two and a half years after the Commission's proposal, no agreement has been reached among the EU institutions. As a result, critical pollutants such as PFAS and TFA remain unregulated in EU waters, contributing to the contamination of even Europe's most pristine water bodies.

TFA, which is an ultra-short chain PFAS and a common degradation product of many PFAS, is now found in surface, groundwater, and even drinking water across Europe. It has even been detected in mineral water⁶ and, more recently, in European wines at much higher levels⁷. PFAS pesticides significantly contribute to this contamination. A [scientific analysis](#) estimates that PFAS pesticides account for up to 76% of TFA pollution in groundwater, compared to 17% from atmospheric sources and 6% from wastewater and manure combined.

This widespread contamination is alarming, particularly as scientific understanding of TFA's toxicity continues to grow. In fact, it has been proposed for hazard classification under Regulation 1272/2008 as: toxic to reproduction category 1B, acutely toxic category 3, very persistent and very mobile (vPvM) and persistent, mobile and toxic (PMT)⁸. Recent scientific warnings also

¹ [Proposal for a Directive amending the Water Framework Directive, the Groundwater Directive and the Environmental Quality Standards Directive, 26 October 2022.](#)

² [Amendments adopted by the European Parliament on 12 September 2023 on the proposal for a directive of the European Parliament and of the Council amending Directive 2000/60/EC, Directive 2006/118/EC and Directive 2008/105/EC.](#)

³ [SCHEER - Scientific Opinion on "Draft Environmental Quality Standards for PFAS total under the Water Framework Directive", 7 April 2025.](#)

⁴ SCHEER PFAS Total Opinion, 7th April 2025, page 3.

⁵ Europe's state of water 2024: the need for improved water resilience, 14 October 2024 [[link](#)]

⁶ PAN Europe, TFA in Water: Dirty PFAS Legacy Under the Radar, May 2024 [[link](#)].

PAN Europe, TFA: The Forever Chemical in the Water We Drink, July 2024 [[link](#)].

PAN Europe, TFA: The 'Forever Chemical' in European Mineral Waters, December 2024 [[link](#)].

⁷ Message from the bottle - The Rapid Rise of TFA Contamination Across the EU. <https://www.pan-europe.info/message-in-a-bottle>

⁸ [Registry of CLH intentions until outcome - ECHA](#)

highlight that TFA poses a serious threat to planetary boundaries, as most of the TFA released today will persist in water supplies and the environment for generations to come⁹.

Therefore, in the context of the ongoing negotiations on the long-overdue update of the priority pollutants lists for surface and groundwater, we respectfully call on you to:

- Incorporate TFA into the 'sum of 24 PFAS' EQS for surface and groundwaters and rapidly extend this approach to include the 100 PFAS that can be reliably determined, as recommended by the SCHEER
- Mandate that Member States incorporate measures to curtail pollution by the newly listed substances in the upcoming River Basin Management Plans, encompassing the period from 2028 to 2033.
- Ensure that the Commission, as well as Member States, take measures to refuse the renewal of ongoing approval or authorisation of PFAS pesticides and withdraw the authorisations of those with more recent approvals according to Regulation (EC) 1107/2009.
- Ensure that Member States significantly reduce the overall use of pesticides in agriculture in line with Directive 2009/128/EC.

We extend our gratitude for your consideration of this pressing matter, and trust that you will make the right decision to protect our water resources, public health and the environment from further contamination by PFAS and TFA.

Sincerely yours,

Angeliki Lysimachou
Head of Science and Policy
Pesticide Action Network Europe

On behalf of (in alphabetical order):

Armenian Women for Health and Healthy Environment, *Dr. Elena Manvelyan, President*
Austrian Doctors for a Healthy Environment (AeGU)/ ISDE Austria, *Prof. Hans-Peter Hutter, Chair*
Child Rights International Network (CRIN), *Suzanne Astic, Policy and Advocacy Adviser*
Coalition Living Earth (Koalicja Żywa Ziemia), *Anna Kucińska, Member*
Earth Trek (Croatia), *Tara Glaser, Campaigner*
Eco Hvar (Croatia), *Vivian Grisogono, President*
Ecologistas en Acción (Spain), *Kistine García, Member*

⁹ [The Global Threat from the Irreversible Accumulation of Trifluoroacetic Acid \(TFA\) | Environmental Science & Technology](#)

Générations Futures (France), *Nadine Lauverjat, Executive Deputy*

Hogar sin Tóxicos, *Carlos de Prada, Director*

ISDE Italy (International Society of Doctors for the Environment), *Francesco Romizi, Public Affairs Manager*

Mouvement Ecologique (Luxembourg), *Blanche Weber, President*

National Society of Conservationists/ Friends of the Earth Hungary, *Ákos Éger, Executive Director*

Nature et Progrès (Belgium), *Virginie Pissoort, Advocacy Officer*

Pesticide Action Network Europe, *Angeliki Lysimachou, Head of Science and Policy*

Pesticide Action Network Netherlands, *Margriet Mantingh, Chair*

Pestizid Aktions-Netzwerk e.v. (PAN Germany), *Gabriela Strobel, Executive Board Member*

Via Pontica Foundation (Bulgaria), *Ina Agafonova, Member*

ZERO (Portugal), *Susana Fonseca, Vice-President*