Pesticide Action Network Europe

To: Claire Bury, Deputy Director-General responsible for Food sustainability
Rue Breydel 4, 1040
Brussels, Belgium
cc: Almut Bitterhof, Karin Nienstedt (DG SANTE; Unit E4-Pesticides and Biocides)

Subject: New study highlights the urgent need to withdraw the approval of all PFAS active substances

25/4/2025

Dear Ms. Claire Bury,

On behalf of PAN Europe, I am writing to share with you our latest report, ***Message from the Bottle*, which reveals alarming levels of the "forever chemical" trifluoroacetic acid (TFA) in European wines**. These findings highlight the urgent need to phase out PFAS pesticides — a major source of TFA pollution, as it has been clearly established.

TFA, a degradation product of several PFAS chemicals including pesticides, is highly persistent, mobile, and toxic for reproduction. It now contaminates water resources at concentrations several orders of magnitude higher than other PFAS. Most concerningly, TFA released today will persist for generations to come, posing a long-term threat to planetary boundaries[1].

Our report found TFA in **100%** of 39 recent wine samples from 10 European countries, with levels reaching up to **320 µg/L** and an average of **122 µg/L**, nearly 100 times higher than those typically found in drinking water. Notably, no TFA was detected in pre-1988 vintage wines, and a sharp increase in contamination has been observed since 2010, strongly linked to the rise in PFAS pesticide use. An important finding is that the wines in the upper half of the TFA concentration range (mean: 176 µg/L) showed, on average, twice the pesticide load compared to those in the lower half (mean: 58 µg/L). This indicates a clear correlation between TFA levels and pesticide use.

Scientific analysis 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. Over 30 PFAS active substances remain authorised for use in EU agriculture, directly contributing to contamination of soil, water, and food.

[1] The Global Threat from the Irreversible Accumulation of TFA | Environmental Science & Technology

This situation clearly violates EU Pesticide Regulation 1107/2009, which prohibits authorisations where active substances or their *relevant* metabolites may contaminate groundwater above 0.1 µg/L (as per Directive 2006/118/EC). Given its ongoing toxicity classification under the CLP Regulation (1272/2008), TFA qualifies as a *relevant* metabolite and is subject to this strict limit. However, TFA concentrations in groundwater regularly exceed this legal threshold.

The growing TFA burden in our environment, particularly in water and food is alarming and calls for urgent and decisive regulatory action.

We therefore urge the European Commission to review and **withdraw the approval of all PFAS active substances**, as required by the Pesticide Regulation (Articles 4(3), 21).

Thank you for your attention to this urgent matter.

Sincerely yours,

Angeliki Lysimachou
Head of Science and Policy
Pesticide Action Network Europe

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