Pesticide Action Network Europe

To: Ms Claire Bury
Deputy Director-General responsible for Food sustainability
Rue Breydel 4, 1040 Brussels, Belgium

Brussels, 2 October 2025

Subject: New Report: Manufacturing Doubt: How Industry Downplays TFA's Toxicity; Call for a TFA assessment independent from industry influence and a ban on PFAS pesticides

Dear Ms Bury,

I am writing to draw your attention to the report *Manufacturing Doubt: How Industry Downplays TFA's Toxicity*, published on Monday, 29 September by Pesticide Action Network (PAN) Europe. The report reveals how major chemical companies have systematically cast doubt on the toxicity of trifluoroacetic acid (TFA), delaying urgently needed protective measures against one of Europe's most widespread PFAS in our environment[1].

TFA is an ultra-short PFAS and the breakdown product of numerous PFAS chemicals, especially PFAS pesticides[2]. Exceptionally persistent and highly mobile, it is now contaminating groundwater, drinking water, wine, and food across Europe.

The report is an **analysis of the industry studies submitted to the relevant EU Agencies and the European Commission** in the course of TFA's hazard and risk assessments.

It reveals that the companies forming the 'TFA Task Force' , including BASF, Bayer, Corteva, and Syngenta, not only delayed in providing required toxicity studies but also systematically downplayed adverse effects, overloading the authorities with misleading claims and speculative arguments.

Key findings include:

- Evidence of TFA's developmental toxicity was available as early as 2010, but the industry poorly reported it to EU regulators. As a result, regulators wrongly concluded

[1] Arp HPH, *et al.* The Global Threat from the Irreversible Accumulation of Trifluoroacetic Acid
[2] UBA, Trifluoroacetate (TFA): Laying the foundations for effective mitigation. Spatial analysis of the input pathways into the water cycle; Joerss H, et al. Pesticides can be a substantial source of trifluoroacetate (TFA) to water resources

that TFA was not harmful to foetal development, despite significant flaws in the way the data had been presented.

- The pivotal 2021 developmental toxicity study, which showed clear skeletal and eye malformations in rabbit offspring caused by TFA, was conducted by the industry only at ECHA's request during a compliance check.
- Taken together, the toxicity studies on rabbits and rats provide compelling evidence of harm even at low doses, including eye and skeletal malformations, thyroid hormone disruption, liver damage, effects on the immune system, and reduced sperm quality. The TFA Task Force intended, unsuccessfully, to demonstrate that the adverse effects in the rabbit developmental toxicity studies and their mode of action were specific to rabbits.
- Many of the adverse effects observed in a multigeneration rat study (EOGRTS) were mischaracterised by the industry consortium as non-adverse or not related to exposure[3]. Such effects, e.g. on thyroid hormones and organ weight, sperm parameters, blood biochemistry and immune system, were statistically significant showing a dose-response relationship. In the course of the hazard classification assessment by ECHA and setting the health-based values by EFSA, these industry errors were identified and reported.

The 'TFA Task Force' companies have clearly failed to comply with the provisions of Regulation 1107/2009, and particularly Article 56, which obliges them to report "all suspected adverse reactions" in humans, in animals and the environment.

Therefore, the report highlights the need for regulators to ensure that any pesticide assessment is **independent, rigorous and transparent, protected from industry's influence and backed by strong independence policies.**

Moreover, the Pesticide Regulation (1107/2009) requires banning pesticides that form harmful metabolites such as TFA and contaminate groundwater above the already exceeded threshold of 0.1µg/L. In accordance with Articles 4(3) and 21, we urge the European Commission to proceed with the withdrawal of the market of all PFAS active substances, which drive TFA contamination.

Thank you for your attention to this important issue.

Sincerely yours,

On behalf of PAN Europe
Angeliki Lysimachou
Head of Science and Policy

[3] An Extended-one-generation-reproduction-toxicity-study (EOGRTS; OECD TG 443) was performed in rats on the request of ECHA, following the compliance-check carried out under REACH Regulation 1907/2006.