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

Cc:
Dr Nikolaus Kriz
Executive Director
European Food Safety Authority
Via Carlo Magno, 1A, 43126 Parma, Italy

23 April 2026, Brussels

Subject: Call for non-renewal of approval of the PFAS active substance diflufenican

Dear Ms. Bury,

We, the undersigned civil society organisations Générations Futures, Global 2000, PAN Europe and PAN Germany, hereby urge the European Commission to propose the non-renewal of the approval of diflufenican, taking into account the latest scientific and technical knowledge regarding the formation of the toxic and highly persistent metabolite trifluoroacetic acid (TFA). We note with serious concern that EFSA's peer-review conclusions on diflufenican, published on 11 February 2026[1], failed to identify TFA formation as a critical concern, an omission inconsistent with the current state of scientific knowledge.

Diflufenican has been approved in the European Union since 2009. It has been listed as a candidate for substitution since 2015, as it meets two PBT criteria, being both persistent and toxic. Its approval, initially due to expire in 2018, has been repeatedly prolonged and is now extended until 2026. The substance is also classified as Aquatic Acute 1 and Aquatic Chronic 1, reflecting its high toxicity to aquatic organisms.

[1] Peer review of the pesticide risk assessment of the active substance diflufenican - 2026 - EFSA

Diflufenican meets the OECD definition of a per- and polyfluoroalkyl substance (PFAS) and contains a trifluoromethyl (–CF_3) group in its molecular structure. This moiety is scientifically established as a precursor of TFA through degradation.

TFA is an ultra-short-chain PFAS that is highly water-soluble. It is currently under assessment at ECHA for harmonised classification as Persistent, Mobile and Toxic (PMT), very Persistent and very Mobile (vPvM), and toxic for reproduction category 1B. The latter is based on evidence of developmental toxicity, including eye and skeletal malformations, as well as adverse effects on sperm quality and the thyroid hormonal system. This establishes TFA as a "relevant metabolite" within the meaning of Article 3(32) of Regulation (EC) 1107/2009, thereby triggering the strict groundwater limit of 0.1 µg/L. According to monitoring data, TFA contamination of groundwater frequently exceeds this threshold[2] and, in some cases, even surpasses the 10 µg/L level applicable to non-relevant metabolites[3]. Due to its high persistence and mobility, current degradation studies are unfit to detect TFA formation and pesticide dossiers have in most cases failed to report it as a degradation product of –CF_3 pesticides. As a result TFA and its toxicity remained below the radar for decades. According to recent scientific warnings, TFA now poses a serious threat to planetary boundaries, as most of the TFA released today will persist in the environment for future generations (Arp et al, 2024).

The industry consortium did not report TFA formation in its diflufenican application dossier, not because the risk was absent, but because, according to EFSA, the studies submitted were not of sufficient duration to detect TFA in soil, surface water, or food residues.

Nevertheless, evidence clearly demonstrates that diflufenican degrades into TFA under real-use conditions. A study conducted by the Geological Survey of Denmark and Greenland (GEUS) showed that, in a representative use on winter cereals, TFA concentrations in groundwater reached 0.12 µg/L, exceeding the legal limit of 0.1 µg/L. This has led Denmark to withdraw authorisations for products containing diflufenican, in accordance with Article 44 of Regulation (EC) 1107/2009. Furthermore, diflufenican has been identified among the pesticide substances with the highest TFA load, with estimated emissions reaching 482 tonnes of TFA per year (Joerss et al., 2024). Another recent study also identified diflufenican as one of the substances with the highest TFA leaching potential in groundwater, particularly for uses on cereals (Diehle et al., 2025).

Despite this body of evidence, of which EFSA was aware of according to its conclusions, for unclear reasons, **these data were not used to draw appropriate conclusions regarding TFA formation and groundwater contamination**. This omission is particularly concerning given the widespread and increasing contamination of food and water resources by TFA, including groundwater, and the resulting threat to drinking water quality and safety. We note, however, that EFSA concluded a high risk to aquatic organisms for all representative uses of diflufenican, clearly indicating that no safe use can be demonstrated.

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[2] Austria, Denmark.
[3] Germany, Sweden, Switzerland.

Under Article 4(1) of Regulation (EC) 1107/2009, an active substance may only be approved if it may be expected, in the light of current scientific and technical knowledge, to meet the approval criteria. This requires no harmful effects to occur on groundwater and no unacceptable effects on the environment. In this case, the available evidence clearly indicates that diflufenican does not meet these criteria.

On 26 March 2026, the Risk Assessment Committee (RAC) of the European Chemicals Agency (ECHA) published its scientific opinion on the 2023 proposal for a universal restriction of PFAS. The Committee concluded that *"the emissions of PFAS and the formation of persistent short-chain PFAS, such as TFA, should be better considered and used in decision-making concerning plant protection products (PPPs)."*

In light of the above, we urge the European Commission to take due account of the latest scientific and technical knowledge, including the evidence on TFA formation and contamination, and to propose the non-renewal of the approval of diflufenican

Yours sincerely,

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Head of Science and Policy
PAN Europe

On behalf of:
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