Brussels, 3 March 2025

To: Ms Sandra Gallina, Director-General
Directorate-General for Health and Food Safety (DG SANTE)
European Commission

Subject: **EDC-Free Europe urges the European Commission to propose the non-renewal of fenoxaprop-P-ethyl and fludioxonil ahead of the upcoming SCoPAFF meeting on 11 and 12 March - in compliance with Regulation 1107/2009**

Dear Ms Gallina,

Ahead of the meeting of the EU Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) on 11 and 12 March 2025, I am writing to you, on behalf of the EDC-Free Europe coalition, to call on the European Commission to swiftly propose the non-renewal of fenoxaprop-P-ethyl and fludioxonil, following their identification as endocrine disruptors by the European Food Safety Authority (EFSA).

EDC-Free Europe is a coalition representing more than 70 public interest groups, who share a concern about endocrine-disrupting chemicals (EDCs) and their impact on our health and wildlife. Our coalition partners include trade unions, consumers, public health and healthcare professionals, advocates for cancer prevention, environmentalists and women's groups.

We draw your attention to the recent identification of fenoxaprop-P-ethyl and fludioxonil as substances with endocrine-disrupting (ED) properties by the European Food Safety Authority (EFSA)[1]. These substances, initially approved until 2018 and later extended until 2025, pose a serious public health risk. Keeping these substances on the market, although there is new evidence on their ED properties, directly contradicts the objective of Regulation 1107/2009, concerning the placing of plant protection products on the market, to ensure a high level of protection for human health and the environment, in line with the precautionary principle as stated in Art. 1(3)(4) of the law.

In light of this, and given the serious health concerns at stake, **we urge the Commission to propose the non-renewal of these substances to the Member States ahead of the upcoming SCoPAFF meeting on 11 and 12 March to ensure compliance with Regulation 1107/2009.**

EFSA's conclusions on the peer review of fludioxonil, a candidate for substitution, published on November 4th 2024, show that the substance meets the endocrine disruption criteria for humans

[1] EFSA, Peer review of the pesticide risk assessment of the active substance fludioxonil, 4 November 2024, EFSA Journal. 2024;22:e9047, https://doi.org/10.2903/j.efsa.2024.9047; EFSA, Peer review of the pesticide risk assessment of the active substance fenoxaprop-P-ethyl, 13 November 2024, EFSA Journal. 2024;22:e9053, https://doi.org/10.2903/j.efsa.2024.9053 .

and wild mammals via the EAS-modalities. This endocrine disruption leads to delayed sexual maturation, decreased anogenital distance in males and increased oestrus cycle in females.

In the case of fenoxaprop-P-ethyl, on November 13th 2024, EFSA concluded that this substance is an endocrine disruptor for humans through the A-modality test. Specifically, this substance was found to induce changes in the weights of the prostate, epididymis, and testes, alongside alterations in testicular weight.

In accordance with Article 4(2),(3) of Regulation 1107/2009, an active substance can only be approved if it is shown that plant protection products containing that substance and their residues do not pose harmful effects on human health or the environment, including on vulnerable groups. Furthermore, points 3.6.5 and 3.8.2 of Annex II stipulate that a substance shall only be approved if it does not exhibit endocrine-disrupting properties that could cause adverse effects in humans or non-target organisms. Given the identification of fenoxaprop-P-ethyl and fludioxonil as endocrine disruptors, their continued approval contradicts these criteria.

Without further delay and in line with Regulation 1107/2009, we urge the European Commission to propose the non-renewal of fenoxaprop-P-ethyl and fludioxonil ahead of the next SCoPAFF meeting on 11 and 12 March. We trust that the European Commission will uphold the EU commitment to ensure a high level of protection of human health and the environment in the EU.

We would like to inform you that this letter will be made public.

Yours sincerely,

Ms. Génon K. Jensen, Spokesperson on behalf of the EDC-Free Europe Coalition,

Executive Director, Health and Environment Alliance (HEAL)

The Secretariat of EDC-Free Europe coalition is hosted by the Health and Environment Alliance
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