

2 October 2025



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**Subject: EFSA letter to CropLife Europe dated 03/05/24**

Dear Mr Robinson,

We are contacting you again regarding the EFSA PERSAM software tool for predicting environmental concentrations of plant protection products (PPPs) in soil. In the EFSA letter dated May 3<sup>rd</sup> 2024 the intention was stated to address the concerns of CLE and JRC (laid out in our previous letter) via the DG SANTE mandate concerning non target terrestrial organisms:

*“Under this mandate we expect to be able to consider the topics raised in your letter. In relation to the SANTE mandate, it is anticipated that a workshop will be held this autumn and that CropLife Europe representatives will be invited and able to discuss this issue (and others) in the workshop.”*

CropLife Europe also welcomed the fact that the call for experts for the ERA working group included a specific requirement for expertise in Environmental exposure and modelling.

However, CropLife Europe have noted a very full agenda of the mandate regarding ecotoxicology, and that soil exposure aspects were barely discussed e.g. in the workshop (held in Brussels in October 2024) for the revision of the terrestrial ecotoxicology GD. We therefore wished to enquire if it is still the intention of EFSA to fully address the concerns raised by ourselves and JRC related to the soil exposure calculations through this mandate, and (if so) how EFSA can ensure that the newly established working group under the mandate includes this point in their discussions.

Yours sincerely

Corrado Finardi  
Director of Regulatory Affairs

A handwritten signature in blue ink, appearing to read 'Corrado Finardi', with a long horizontal flourish extending to the right.

cc. Manuela Tiramani (EFSA)  
Christopher Lythgo (EFSA)  
Mark Williams (DG SANTE)

*This letter will be published on the CropLife Europe website and will be available at:*  
<https://croplifeeurope.eu/resources-library/>