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# Joint statement to EFSA's Public Consultation on the assessment report on the active sub- stance sulfuryl fluoride - EFSA-Q-2017-00822

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The German Environmental Action (Deutsche Umwelthilfe e.V.) and the Munich Environmental Institute (Umweltinstitut München e.V.) welcome the opportunity to provide comments on the Rapporteur Member State's Assessment Report on the pesticide active substance sulfuryl fluoride through a public consultation by the European Food Safety Authority (EFSA). This current EFSA consultation under the Question Number EFSA-Q-2017-00822 is part of the risk assessment of this chemical required for renewal of its approval.

A primary concern of the Munich Environmental Institute (Umweltinstitut München e.V.) and the German Environmental Action (Deutsche Umwelthilfe e.V., DUH) is to protect human health and the environment from the harmful effects of pesticides. In addition to protecting the environment by reducing the use of synthetic chemical pesticides in agriculture, the organizations also advocate for the fastest possible phase-out practices in plant protection that drive climate change. We note that any contribution to global warming increases the risk for the loss of habitats and therefore the mass extinction of animal species as well as serious negative impacts on humans e.g. on health and food supply.

The usage of pesticides containing sulfuryl fluoride is of particular concern, due to the extremely high global warming potential of this substance.

ProFume is the only pesticide product containing the active substance sulfuryl fluoride and is – besides other applications -- commonly used in fumigation of roundwood before export overseas. Within 20 years, sulfuryl fluoride has a 7,500 times higher global warming potential than carbon dioxide, while in the timeframe of 100 years the global warming potential is 4630 according to the sixth IPCC report.

The German Environmental Action with the support of the Munich Environmental Institute is taking the German national approval authority, which is the Federal Office of Consumer Protection and Food Safety (file reference number: 1 A 52/25), the City of Hamburg (federal reference number: 5 K 1159/26), and the EU-Commission (reference number: T-467/24) to court for failing, in the NGO's view, to comply with the PPP-Regulation and the requirements of the EU F-Gas Regulation in the case of ProFume/sulfuryl fluoride. The associations are therefore aware of valuable scientific information for the purpose of the EFSA consultation at hand.

The NGOs appreciate that the report presented here considers the climate impact of sulfuryl fluoride. They agree with the reporting member state that climate impact cannot be dismissed as negligible. They would like to see a similar approach in the German approval system, which has so far ignored the signifi-

cant greenhouse effect caused by emissions from ProFume fumigation. However, this assessment process must be safeguarded against industry attempts to in other ways downplay the potential climate effects and other problematic areas of sulfuryl fluoride.

In the context of the public consultation, the organisations criticise the strategic choice of the representative use case (emptied storage or mills) by the applicant Douglas BLG BVBA, who is also the manufacturer of the product ProFume, in the assessment report. The chosen application fails to cover problems that common use cases in Europe show – such as fumigation of logs in sea containers<sup>1</sup>: Up to 1890 tons of Sulfuryl fluoride in the years 2020-2024 in Germany alone, mainly for roundwood fumigation. The choice of the use case by the applicant is thus highly problematic for two reasons: It circumvents known efficacy problems of ProFume and downplays the contribution to climate change.

Firstly, the lack of efficacy becomes apparent through complaints by Import Countries (China) about insufficient pest control e.g. towards German authorities. This is supported by the fact that the Netherlands stopped issuing phytosanitary certificates for SF fumigation of logs<sup>2</sup>. Furthermore, the targeted species (e.g. *Ips typographus*) differ in the representative use case and in application on logs and wood products. The German Government program KlimaTiv has found deficits in efficacy of Sulfuryl fluoride in log treatment<sup>3</sup>, which are also discussed in the work of Kümmeritz et al.<sup>4</sup>. Doubts in efficacy should be removed by the applicant in the assessment report. However, the applicant failed to provide Good Laboratory Practice studies for this relevant use case.

Secondly, the usage for fumigation of logs in sea containers imposes a relevant contribution to climate change, which should not be let out of the picture in this assessment affecting a possible renewal of the authorization of this active substance. According to information provided by German federal plant protection authorities, the usage for fumigating export wood is at least in Germany much more prevalent than the selected representative use case and therefore has a higher emission potential<sup>1</sup>. This is exacerbated by the fact that, although the outdoor application takes place in containers, these containers are leaky and are subsequently vented, causing the gas to be released directly into the atmosphere. We assume that if this use case had been selected, the report's assessment of the climate impact would have been even more severe; however, the applicant—who stands to benefit most from approval—apparently chose a “less harmful” use case for this very reason.

Based on our critique of the assessment report it becomes apparent that the applicant failed to provide relevant information regarding use cases, efficacy and substantial climate impact of sulfuryl fluoride. We therefore expect the European Commission to withdraw the approval of sulfuryl fluoride as an active substance.

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**Link to the participation process:** <https://open.efsa.europa.eu/questions/EFSA-Q-2017-00822>

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<sup>1</sup><https://nextcloud.umweltinstitut.org/s/tm6qnezKHXX8eXQ>

<sup>2</sup><https://english.nvwa.nl/latest/news/2024/12/06/nvwa-will-no-longer-issue-export-certificates-for-tree-logs-treated-with-sulfuryl-fluoride-as-of-january-1-2025>.

<sup>3</sup>[https://www.ressortforschklima.de/fileadmin/ressortforschklima/Projekte/Abschlussbericht\\_RessortForschtKlima\\_final.pdf](https://www.ressortforschklima.de/fileadmin/ressortforschklima/Projekte/Abschlussbericht_RessortForschtKlima_final.pdf)

<sup>4</sup> <https://www.irg-wp.com/irgdocs/details.php?c3b979e5-1252-2cee-43b0-2874d1245481>