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To the Permanent Representation of
the Member States to the EU

Brussels, 18 September 2026

Subject: Request for support for further authorisation of active substances Fludioxonil and Cyprodinil under Article 4(7)

Dear ScoPAFF Representative,

We are reaching out to you regarding the active substances Fludioxonil and Cyprodinil, which will be discussed during the upcoming SCoPAFF meeting. The regulatory situation of fludioxonil in the European Union is raising serious concern among fruit and vegetable growers across Europe. During its re-evaluation, EFSA has identified endocrine-related concerns, which will lead the European Commission to propose non-renewal of the substance. At the same time, cyprodinil, often used together with fludioxonil for control of rot pathogens, is also facing the same non-renewal proposal situation. Non-renewal affecting these substances would have significant cumulative impacts on disease such as storage rots in various crops.

Fludioxonil and cyprodinil are essential fungicides in fruit production. Across all major fruit crops—e.g. pear, apple, kiwi fruit, stone fruits, and berries—fludioxonil plays a critical role in controlling fruit rots caused by pathogens such as *Botrytis cinerea* / *Botryotinia fuckeliana*, *Penicillium expansum*, *Monilia* spp., and other fungi like *Colletotrichum* spp. and *Venturia* species. Without effective protection against these diseases, significant losses occur during storage. Another problem is that some of the symptoms of the different pathogens become visible along the supply chain and in retail outlets so the fruits cannot be sold to the consumer. Such losses, combined with declining marketability, would put fruit cultivation under severe economic pressure. Currently, fludioxonil and cyprodinil represent the most effective tools available to manage these pathogens during the pre-harvest time and during the storage. There are no alternative fungicides with equivalent efficacy to ensure adequate control under commercial storage conditions. Furthermore, in pears, the combination product based on fludioxonil and cyprodinil is indispensable for the control of *Stemphylium vesicarium* and *Alternaria* spp. Harvest losses of 50 to 80% threaten the survival of pear cultivation.

The withdrawal of former alternatives—such as thiophanate-methyl—has already significantly reduced the number of effective modes of action against fungal diseases that develop after storage. Without fludioxonil and cyprodinil, producers would be left with no viable solutions to prevent serious post-harvest losses as in case of kiwi fruit or pip fruits. Technical institutes demonstrated that in certain varieties, such as for apples Evelina and Topaz, losses of 10% to 40% after technicals of storage can be observed in the absence of effective fungicidal protection. This demonstrates the essential nature of these substances in preventing significant and predictable economic damage.

Furthermore, both substances also provide essential disease control functions for several vegetables (fruiting vegetables, onions, asparagus, carrots etc.) against hard-to-control seed- and soil-borne fungal diseases, which lead to significant yield losses. Moreover, Cyprodinil plays also very important role in anti-resistant strategies, as an effective tool in early applications against main apple disease - scab (*Venturia inaequalis*) as a systemic active substance belonging to aniline-pyrimidines active mode group applicable and effective under low



temperatures. The same applies, for example, for *Monilia* spp. infestations in apricots, peaches and the other stone fruits.

The withdrawal of these active substances would remove the last available option to control certain harmful organisms in some crops and reduce fungicide rotation options in others, increasing the risk of resistance development in several fungal pathogens and further limiting the possibility of disease management. The available technical evidence demonstrates that fludioxonil and cyprodinil are indispensable for maintaining disease-free fruit during storage and for preventing substantial, unavoidable losses in many different crops.

The mechanism of essential uses under Article 4(7) of Regulation 1107/2009 exists precisely to address these situations: it is not an anomalous derogation, but a policy tool that the European legislator deliberately established to protect uses of critical importance where science identifies no viable alternatives. Applying it correctly, on the basis of the available scientific information and the assessments submitted by Member States, is not only legitimate but necessary.

In this context, we support the need for the Commission to grant EFSA the mandate to assess essential uses means defending not only the competitiveness of European agriculture but also contributing to building a European regulatory system capable of balancing scientific rigor with production sustainability, in the interest of farmers, consumers, and the agri-food system as a whole."

In light of the absence of viable alternatives and the risk of significant damage to plant health, we respectfully request your support for maintaining the authorization of plant protection products containing these substances. As currently no other solutions are available, an essential use derogation under Article 4(7) of Regulation (EC) No 1107/2009 represents the only remaining option to safeguard production. We therefore urge you to grant such a derogation. This measure is essential to ensure safe and reliable disease management until suitable alternatives have been identified, assessed, and made available.

We appreciate your attention to this matter and are ready to provide further information or collaborate on defining practical risk mitigation strategies for the safe use of Fludioxonil and Cyprodinil.

Yours faithfully,



Elli Tsiforou
Secretary General

