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1 Passive sampling of herbicides above sediments at sites
2 with losses of submerged macrophytes in a mesotrophic
3 lake

4

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10 KEYWORDS: Passive sampling, *Chara* lakes, sediment toxicity, ecotoxicological risk
11 assessment, subsurface discharge

12

13 ABSTRACT. Declines of submerged macrophytes (SUM) were monitored in littoral zones
14 of the deep, mesotrophic lake Suhrer See (Northern Germany) since 2017. Drastic losses
15 coincided with intense agriculture in sandy sub-catchments and precipitation. All lines of
16 evidence pointed to a causal connection with subsurface discharge indicating that
17 herbicide application might have caused the effects. Passive sampling was applied in 2022
18 to elucidate, whether herbicides were really present at sites of losses and if so, in
19 ecotoxicological relevant concentrations. Samplers were exposed on top of lake sediments
20 in 2 m depth and under worst case conditions, i.e., at sites, known for losses of the whole
21 functional group of SUM and at the beginning of the vegetation period. At this time, SUM
22 diaspores were most vulnerable to repression of development and the subsurface
23 discharge was high in the same instance. The potential ecotoxicological relevance of
24 detected herbicide concentrations was assessed with a toxic units (TU) approach, with
25 reference to acute effect concentrations (EC50 of green algae, 72h, growth). The TU
26 ranged from 0.001 to 0.03. Most concentrations exceeded the threshold of relevance set
27 by an assessment factor of 1000, i.e., $TU > 0.001$. Locally applied herbicides acted by
28 suppressing developmental stages, and the sum of TU exceeded 0.02 at all sites, mainly
29 due to diflufenican. Not applied locally, terbuthylazine and its relevant metabolites,
30 including terbutryn, acted by inhibiting photosynthesis, and the sum of TU reached 0.005.
31 On this base, diflufenican was assessed to be likely a main stressor, all other detected
32 herbicides to be potentially relevant. Uncertainties and knowledge gaps were specified.
33 The result of the chemical risk assessment was counterchecked for consistence with
34 biological monitoring data within a whole lake perspective. Concepts of empirical and
35 advanced causal attribution methodology were applied to get a grip to the ecological
36 causal field and to protection.

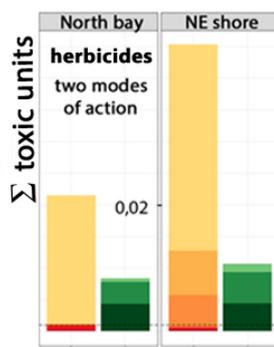
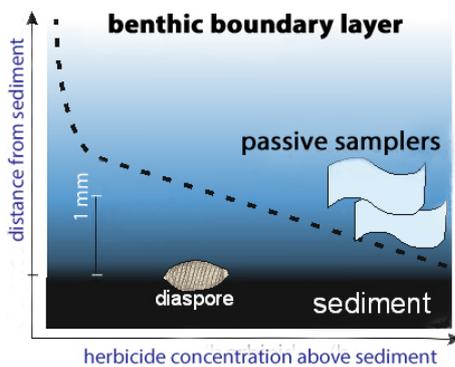
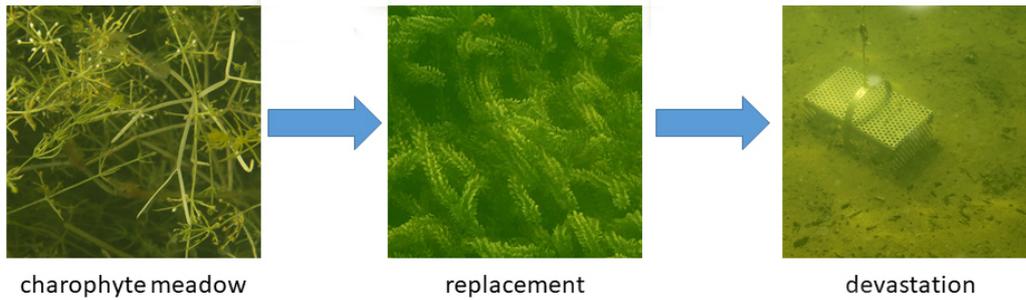
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39 GRAPHICAL ABSTRACT

40

Gradual losses of submerged macrophytes



Ecotoxicological risk assessment

chemical prognostic
verification
↓
holistic retrospective
validation

41

42 Highlights

- 43 • Monitoring of ecological stress responses of submerged macrophytes (SUM)
- 44 • Detection of herbicide residues at sites with missing SUM
- 45 • Identification of diflufenican and terbuthylazine as toxicity drivers
- 46 • Specification of uncertainty and knowledge gaps in chemical risk verification
- 47 • Risk validation by SUM responses, causal attribution and stressor concepts

48

49 **1 Introduction**

50 The deep, groundwater fed lake Suhrer See is a nature reserve with underwater meadows
51 of charophytes (Schubert et al. 2018, lanaplan 2022, see also SM-1). In the extremely wet
52 summer 2017, submerged macrophytes (SUM¹) disappeared at some sites in the
53 agricultural northeast, while charophyte meadows stayed vital in bays in the north and
54 northwest, surrounded by terrain without agricultural production. In the subsequent
55 extremely dry summer, charophytes recovered at some sites in the northeast and were
56 replaced by dense stands of angiosperms at others. One site even remained bare. The
57 circumstantial evidence pointed to an impact of agriculture, mediated by precipitation.
58 Applied herbicides were the *prima facie* suspect, also in view of the coeval discussion of
59 causal relations between pesticides and aquatic biodiversity losses (Schäffer et al. 2018,
60 Schäfer et al. 2019). The suspicion was substantiated by a conspicuous decay of a before
61 wintergreen charophyte meadow in 2020. The difference made a field next to the affected
62 north bay, that was recultivated in autumn 2019, after it has been taken out of production
63 for years.

64 The changes were documented by systematic, seasonal monitoring and underwater
65 photography as part of care for the nature reserve in responsibility of the NABU Plön
66 (branch of nature protection association). The local disturbances reached from
67 replacements by less sensitive species to losses of the whole functional group. Thus, they

1 Abbreviations: AF: assessment factor; CC: Chemcatcher with SDB-RPS disk (passive sampler for polar compounds);
CfS: candidates for substitution; DT50: half live; EC50: concentration causing an acute 50% effect in standardized tests;
ERA: ecotoxicological risk assessment; Kow: octanol water partition coefficient; Ksw: sampler water partition coefficient;
N, NE: north, northeast (exposure sites); PDMS: polydimethylsiloxane (passive sampler for nonpolar compounds);
PPDB: pesticides properties data base; SUM: submerged macrophytes; TBZ, TBZ-: terbutylazine, -metabolites; TBT:
terbutryn; TU: toxic units; TWA: time-weighted average; WFD: water framework directive

68 displayed a classical response to increasing stress (Odum 1985, Krambeck 2022).
69 Wintergreen charophyte stands were most sensitive and missing in the northeast with its
70 larger agricultural subcatchment. The spring development of new SUM generations was
71 regularly retarded at sites in the northeast, in wet summers more or less for the whole
72 season. Recovery depended on summer dryness (for definition of wetness degrees by
73 difference between precipitation and evaporation see SM 1.4).
74 All lines of evidence together made a causation of SUM declines by interflow from sandy
75 sub-catchments with winter grain cultivation likely. The criteria of Hills framework for the
76 evaluation of causation against a background of coincidences (Hill 1965, Köhler &
77 Tribskorn 2013, Tribskorn et al. 2003) were consistent with the findings (see SM-3.1).
78 However, the possibility of ecotoxicological effects in lakes was previously excluded.
79 Dilution in large water bodies seemed simply too high to reach concentration limits
80 considered toxic. For example, an environmental agency screening in the federal state of
81 Schleswig-Holstein (LLUR 2018) yielded detections of 121 organic xenobiotics in rivers,
82 but hardly any in lakes. Monitoring according to the water framework directive (WFD) also
83 revealed general improvements of lake phytoplankton with decreasing eutrophication, but
84 on the other hand still deterioration of SUM. Therefore, the LLUR SH initiated analytical
85 campaigns, extended its regular WFD macrophyte monitoring in the lake Suhrer See,
86 supported a suspension of herbicide application on half a field in the northeast, and
87 convened expert rounds. Eventually, proves were considered missing. Scientifically, the
88 question was: Were herbicides really present at times and places of disturbances of SUM
89 and if so, were concentrations high enough to be attributed to the observed responses?
90 Passive sampling (Vrana et al. 2007, Schulze et al. 2011) is the method of choice to
91 determine herbicides on top of sediment surfaces and appears as an appropriate and
92 sufficiently sensitive approach (Grodtko et al. 2021). The most vulnerable charophyte

93 diaspores (oospores, bulbillae) lie on the surface of sediments; and potentially wintergreen
94 underwater meadows develop in around 2 m depth. Near zero flow and high vertical
95 gradients are characteristic for the benthic boundary layers in this habitat. This poses a
96 problem to determine real on-site concentrations. Nevertheless, passive sampling was
97 applied successfully before to tackle gradients at the sediment/water interface (Mechelke
98 et al. 2019). Additionally, passive samplers are known to have toxicokinetic and
99 toxicodynamic properties similar to organisms (Vermeirssen et al. 2005), especially for
100 nonpolar compounds (Bayen et al. 2009). Thus, samplers lying on top of sediments like
101 diaspores of SUM promise best possible results. Tentatively, a pilot trial was started with
102 passive samplers for nonpolar and polar compounds, covering the range of herbicides
103 known to be applied locally.

104 Risk assessment required additional information on sensitivities of the affected
105 developmental stages of SUM. Because corresponding ecotoxicological data were
106 missing, standardized, short-term effect concentrations (EC50 green algae, 72h, growth)
107 from data sets were used as a surrogate in order to approximate chronic toxic potentials of
108 detected herbicide concentrations (EC 2018, Escher et al. 2021). Combined effects were
109 assessed following the toxic units (TU) concept, which was developed for prognostic
110 ecotoxicological risk assessments based on environmental concentrations when biological
111 data are missing (Backhaus & Faust 2012). In the case given, the real risks are known *ex*
112 *post*, and the task is to assess the probable contribution of herbicides to the manifested
113 effects. Thus, uncertainties inherent to the TU concept have to be considered (ECHA
114 2012, EC 2018).

115 The chemical risk assessment verifies a risk posed by the measured herbicide
116 concentrations in principle. A further confirmation of the hypothesis, that herbicides are a
117 main cause of the observed stress responses of SUM, needs a risk validation, i.e. a

118 countercheck of the prognosed risk by integration into the retrospective ecological risk
119 assessment. To get a better grip to this task, we try to adopt concepts of advanced causal
120 attribution methodology, in addition to the more accustomed multiple lines of evidence and
121 Hill's criteria. Principles of causal attribution and an application of formal logic to the
122 emerging causal field (Hamilton et al. 2015, Minnerop and Otto 2020, Hill 1965, see SM-3)
123 are in fact found useful to contextualize the findings within an ecological whole lake
124 perspective and to assign protection priorities.

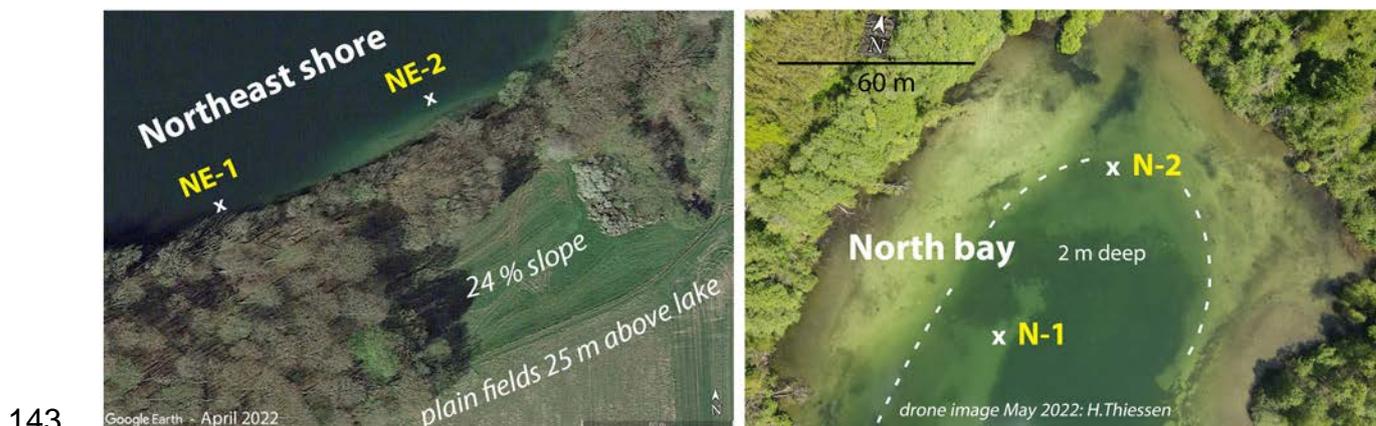
125 **2 Materials and methods**

126 Passive samplers were exposed from April to Mid-June 2022. PDMS sheets (SSP-M823,
127 150 x 55 x 0.5 mm³ from Specialty Silicone Products Ballston Spa, NY, USA) were used
128 as passive samplers for nonpolar compounds with log K_{ow} (octanol-water partition
129 coefficient) ranging from 3.5 to 6.0. Chemcatchers® (CC, d=47 mm, from AT Engineering
130 Technology, Tadley, UK) equipped with disks of styrene divinylbenzene reversed phase
131 sulfonate (SDB-RPS from Affinisep, France) and diffusion limiting polyethersulfone
132 membranes (PES, pore size 0.45 µm, from Pall, Port Washington/USA) were used as
133 passive samplers for polar compounds (log K_{ow} < 4.0).

134 **2.1 Selected sites for passive sampler exposure**

135 Four sites with drastic losses of SUM were chosen for exposure of passive samplers, two
136 at the northeast shore (NE-1 and NE-2) and two in the north bay (N-1 and N-2) of the lake
137 Suhrer See in Schleswig-Holstein, Northern Germany (Figure 1, SM-1.1). PDMS sheets
138 were exposed over two months at the northeast and north sites. Chemcatchers were
139 exposed in two subsequent campaigns with a duration of 33 d and 29 d at NE-1, 15 and
140 29 d at NE-2 and 29 d and 36 d at N-1 and N-2. Chemcatchers were additionally exposed

141 during the second field campaign (28 days) at a site in a bay in the northwest without
142 agriculture in its subcatchment.



144 *Figure 1: Left: Sampling sites at the north east shore. Right: Sampling sites in the*
145 *bay.*

146 Duplicates of each kind of passive sampler were exposed in a perforated metal cage that
147 was open towards the sediment surface and designed to sit on it (SM-2, Figure SM-2.1).
148 The samplers were fastened to the cage with zip ties to lie on the sediment surface as
149 close as possible. The cages were made retrievable from 2 m depth by a line with a buoy.
150 One cage was exposed per site, snorkeling a distance of 10 m to 20 m from shore at the
151 northeast sites and around 60 m in the north and northwest bay. Conditioned and
152 assembled passive samplers were stored at 2°C and transported to exposure sites in
153 Styrofoam boxes within one hour. Trip blanks were treated as the passive samplers in the
154 cages, but stored at 2°C instead of being exposed. All samplers were handled with Latex
155 gloves and on lint-free papers. After exposure, the samplers were disassembled, the PES-
156 membranes were discarded, and the samples were stored frozen in glass vials.

157

158 **2.2 Preparation, extraction and analysis of passive samplers**

159 Before exposure, the passive samplers were conditioned. SDB-RPS disks were shaken in
160 methanol for 30 min at 150 rpm on a rotary shaker and subsequently rinsed in bidistilled
161 water (30 min on a rotary shaker). The PES membranes were treated similarly. The disks
162 and the PES membranes were stored in bidistilled water until sampler assembly. PDMS
163 sheets were soxhlet extracted with ethyl acetate for 40 h. Subsequently, the strips were
164 stored in methanol until exposure.

165 SDB-RPS disks were extracted with 10 mL acetone for 30 min, 10 mL methanol (1%
166 formic acid, 20 min), 10 mL methanol (20 min), and 10 mL methanol (with 5% ammonia
167 solution, 20 min). The combined extracts were evaporated in an ExcelVap (Horizon
168 Technologies) to a final volume of 1 mL. PDMS sheets were extracted thrice with 20 mL
169 acetone for 1 h each. Combined extracts were evaporated to a final volume of 1 mL and
170 dried with Na₂SO₄. Samples were stored frozen until analysis.

171 Chemcatchers were analyzed using a 1290 Infinity series HPLC system with a 6460
172 TripleQuad mass spectrometer (Agilent Technologies). The system was equipped with a
173 Kinetex EVO C18-column (2.6 μm particle size, 50 mm x 3 mm) with a guard column
174 (Phenomenex). Bidistilled water with 1% formic acid was used as eluent A and acetonitrile
175 with 1% formic acid was used as eluent B. The analysis was performed in positive
176 ionization mode. The eluent gradient, target list with transitions, and retention times can be
177 found in Table SM-4 and SM-5.

178 The PDMS extracts were analyzed with a 7890A GC system, equipped with a HP-5SM UI
179 column (30 m, d = 0.25 mm, 0.25 μm film), with a 5975 inert XL EI/CI mass spectrometer
180 (Agilent Technologies) and a Gerstel Multipurpose autosampler. Helium was used as a
181 carrier gas with a flow rate of 1.2 mL/min. The starting temperature was set to 50°C, which
182 was held for 2 min. The temperature was increased to 200°C with a rate of 12°C/min.
183 Subsequently, the temperature was raised to 250°C with a rate of 5°C/min. The final

184 temperature was held for 10 min, yielding a total runtime of 34.5 min. Monitored masses
185 and retention times can be found in Table SM-6.

186 **2.3 Calculation of aqueous concentrations**

187 Uptake kinetics of PS follow a saturation curve and can be described by simplified
188 equations for the linear phase and the saturation phase (Grodtko 2021, Smedes and Booij
189 2012), facilitating the calculation of concentrations in water from amounts extracted with
190 the passive sampler.

191 Uptake of CC-RPS with membranes was assumed to stay in the linear uptake phase
192 within one month in standing water. Time-weighted average (TWA) concentrations can be
193 calculated from amounts collected by sampler (m_s), uptake rate (R_s) and duration of
194 exposure (t) by equation (1):

$$c_w^{twa} = \frac{m_s}{R_s \cdot t} \quad (1)$$

195

196 Under nearly quiescent condition, a sampling rate of 0.01 L/d was estimated to be the best
197 available approximation (Römerscheid, 2023).

198 For PDMS, distribution equilibrium was assumed after two months in standing water.
199 Calculation of concentrations in ambient water (c_w) from amounts per sampler (m_s)
200 requires the volume of the sampler (V_s) and the sampler-water partition coefficient
201 ($K_{sw,(2)}$):

$$c_w = \frac{m_s}{V_s \cdot K_{sw}} \quad (2)$$

202 $K_{sw, PDMS}$ were calibrated by Grodtko (2021) for most of the compounds detected with
203 standard deviations (sd) in the range of 10% to 20%. K_{sw} for diflufenican, pendimethalin

204 and prosulfocarb were calculated from the linear fit between $\log K_{ow}$ and $\log K_{sw}$ ((3), rse:
205 0.451, r^2 : 0.752)

$$\log K_{sw} = 0.79 \log K_{ow} + 0.36 \quad (3)$$

206

207 Calibrations of K_{sw} were conducted for 20° C. Exposure temperature increased from early
208 April to mid-June from 5 to 20 °C.

209

210 **2.4 Relation to EC50 for assessment of toxic relevance**

211 Because sensitivity data for diaspore development were missing, short-term toxicity data
212 (EC50 for green algae, 72 h, growth) from standard data sets were taken as surrogate. An
213 assessment factor (AF) of 1000 was inserted for extrapolation to potentially chronic effects
214 (according to 3.3.1.1 in EC 2018). Herbicides with relations of detected concentrations to
215 their EC50 near or over 1/1000 or a toxic unit (TU) of 0.001 were then identified as likely
216 relevant. Relations of TU near or over 0.01 were interpreted as indication for likely main
217 stressors. Multiple stress was assessed by addition of TU of compounds with a similar
218 mode of action (Backhaus & Faust 2012). Toxic units are determined according to
219 equation (4) from the aqueous concentration of an analyte (c_w) and its EC50 value.

$$TU = \frac{c_w}{EC50} \quad (4)$$

220

221 **3 Results and discussion**

222 **3.1 Timing and choice of exposure sites: landscape context and** 223 **stress history**

224 Spring was chosen for exposure because monitoring had revealed regular failings of SUM
225 regrowth at this time of the year at sites with agricultural subcatchments (Krambeck 2020,
226 2022). After extraordinary precipitation in February 2022 (over 3 times the mean), high
227 interflow was expected. SUM did in fact not develop up to June, neither at the exposure
228 sites at the northeast shore, nor in the north bay.

229 The lake Suhrer See lies in a sandy morainal plain and is fed by groundwater. Subsurface
230 discharge prevails due to the high permeability of soils and the small subcatchment.
231 Traces of surface discharge are found at few places only, even after heavy rains.

232 The northeast shore with the exposure sites NE-1 and NE-2 (fig.1 left) is bordered by a
233 steep, mainly forested slope ascending to 23 to 26 m above lake level over a distance of
234 100 m from shore. On top of the slope follows a sudden transition to a plain with long-
235 standing intense agriculture. This relief of the landscape results in a high hydrological
236 subsurface gradient towards the lake which feeds swamp springs at the base of the slope,
237 accompanying the whole East side of the lake. The exposure site NE-2 was chosen
238 because it was sometimes colonized by angiosperms and sometimes not, in dependence
239 of precipitation. The site NE-1 was without SUM the last years and lies in between two
240 drain creek outlets (see fig. SM-7).

241 The terrain around the north bay lies no more than 8 m above lake level and is surrounded
242 by areas without intense agriculture in the east and west. In the north of the bay lies a
243 swamp without visible hydrological connection that reaches to the limits of the catchment
244 area in 100 m distance from the lake. A field north of the swamp was removed from
245 production up to 2019 (see areal view, fig. SM-2). SUM responses to the recultivation (see
246 also chapt.3.4) indicate a larger subsurface catchment. The two exposure sites in the north
247 bay, N-1 and N-2 (fig. 1 right), were positioned in the western and inner realms of the bay
248 known to be disturbed since the recultivation of the nearby field since 2020.

249 **3.2 Chemical analysis of passive samplers**

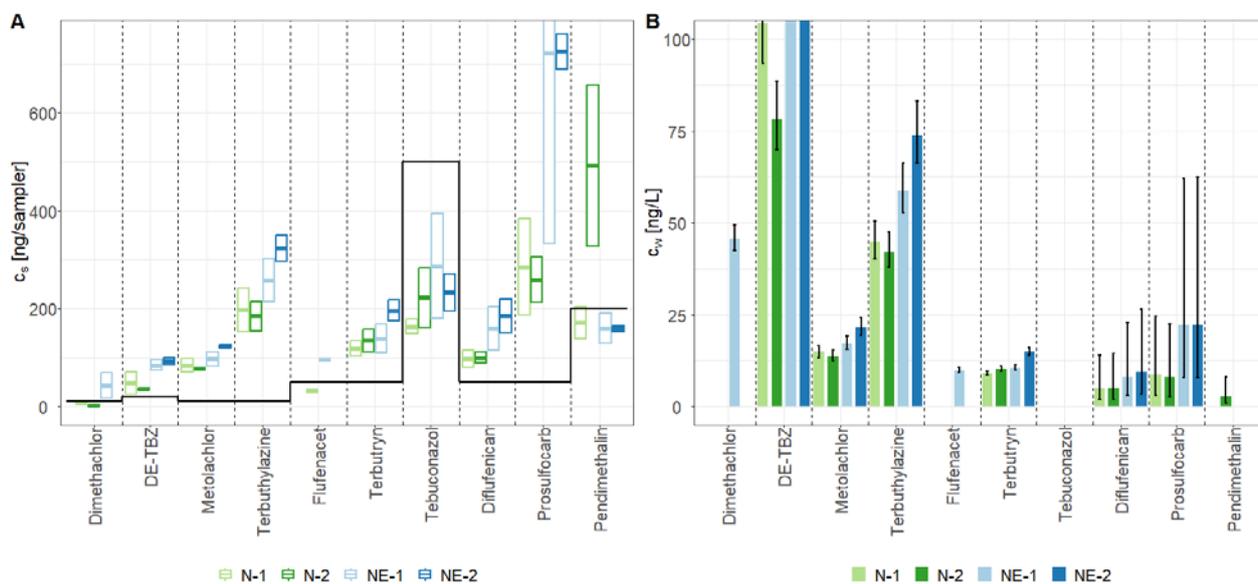
250 **3.2.1 Detected compounds and local distributions**

251 In the PDMS sheets, eight herbicides and one metabolite (desethyl-terbuthylazine, DE-
252 TBZ) with log K_{ow} ranging from 2.0 to 5.4 could be quantified (Figure 2 A). All target
253 analytes were present above quantification limits at all four exposure sites, except
254 pendimethalin, flufenacet, and dimethachlor. The quantified concentrations range from
255 35 ng/sampler for DE-TBZ at the site N-2 to 724 ng/sampler for prosulfocarb at the site
256 NE-2. The levels showed a tendency to higher concentrations at the sites in the northeast
257 compared with the sites in the north bay.

258 Standard deviations of duplicates range from 0% to 83%, with a 90% quantile of 57%,
259 implying that duplicates of single compounds rarely differed by more than a factor of 2,
260 The scatter can be attributed to the exposure within benthic boundary layers with high
261 concentration gradients and small-scale variability (Boudreau & Jørgensen 2001, Dade
262 1993, Roy et al. 2002). The thickness of the initial diffusive boundary layer may reach
263 1 mm to 2 mm on top of deep sediments and is followed by a zone of some cm, where
264 laminar flow and Eddy diffusivity begin to rule the water exchange to the lake, thus that the
265 very steep gradient in the initial millimeters diminishes up to balance with the overlaying
266 lake water (Wehrli & Wüst 1996, Wetzel 1975). The samplers were mounted as close to
267 the sediment surface as possible, which was in a range of 0 to 1 cm (cf. SM-2, Figure SM-
268 10). Random proximity of bioturbation to duplicates may have increased the scatter. The
269 uncertainty is comparable between both sampler types and a little higher than expected for
270 deployments in turbulent running waters.

271 Fig 2B shows the aqueous concentrations c_w derived from PDMS sheets. Due to the
272 increase of partition coefficients over three orders of magnitude (see tab SM-6, SM-2.2),
273 the concentrations of the nonpolar compounds strongly decrease compared to c_s , while

274 concentrations of the more polar compounds increase. Therefore, the highest aqueous
 275 concentration can be found for DE-TBZ at the site NE-2 (203 ng/L), while pendimethalin
 276 can only be detected at the site N-2 in a concentration as low as 2.8 ng/L.



277

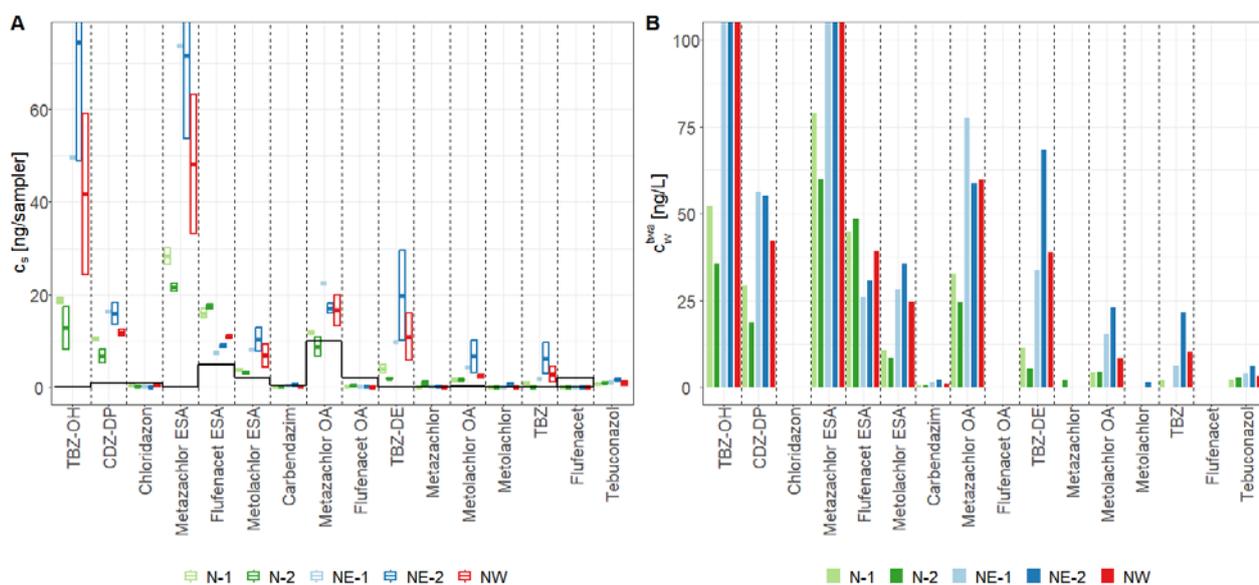
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279 *Figure 2 A: Detection of selected herbicides in PDMS strips m_s in [ng/sampler] (sorted by*
 280 *$\log K_{ow}$). Length of the boxes represents the duplicate samples. Bold line represents the*
 281 *mean c_s . The black line shows the limit of quantification (derived by signal to noise ratio,*
 282 *see Table SM-4). B: Derived c_w concentrations from sampler-water partitioning coefficients*
 283 *(section 2.3) sorted by $\log K_{ow}$. Uncertainties describe the error of the applied partition*
 284 *coefficients. DE-TBZ: desethyl terbutylazine.*

285

286 In the Chemcatchers, four herbicides ($\log K_{ow}$ ranging from 1.55 to 3.70), eight
 287 metabolites, and a fungicide (terbuconazole) could be quantified in the second sampling
 288 campaign (Figure 3A). Standard deviations of the duplicates range from 0.2% to 141%.
 289 The 90% quantile of the standard deviation is 65%.

290 Concentrations in the sorbent phase decrease with increasing $\log K_{ow}$, which shows the
291 mobility of more polar compounds on the one hand, and can additionally be ascribed to the
292 limitations of the applied Chemcatcher design: With decreasing polarity, a larger amount
293 might be retained in the diffusion limiting membrane. Time weighted average (TWA)
294 concentrations ranged from 2.1 ng/L to 21 ng/L for terbuthylazine (TBZ, $\log K_{ow}$ 3.40),
295 5.4 ng/L to 68 ng/L for TBZ-DE ($\log K_{ow}$ 3.66), 4.2 ng/L to 257 ng/L for other metabolites
296 and 2.3 ng/L to 6.1 ng/L for tebuconazole ($\log K_{ow}$ 3.70). All investigated fungicides and
297 metabolites were detected in all samples. Parent compounds of herbicides besides TBZ
298 were only detected in the northeast: flufenacet at NE-2 and metolachlor at NE-1 and NE-
299 2. In the first sampling campaign, metolachlor was not detected, but dimethachlor, though
300 only in concentrations near the limit of detection (0.5 ng/L to 0.8 ng/L). The result could be
301 explained by the different application schedules (dimethachlor in autumn for rape and
302 metolachlor for corn in May) The concentrations of all other compounds showed no trends
303 between the two sampling campaigns. Concentration levels of single compounds were
304 similar for the northeast sites and the northwest bay, whereas levels in the north bay were
305 lower by comparison, except for the metabolite flufenacet-ESA which might be due to the
306 application of flufenacet on the recultivated field the autumn before (see table SM-1).



307

308 *Figure 3: Detection of selected compounds in Chemcatchers, m_s in [ng/sampler] (sorted by*
 309 *$\log K_{ow}$). Length of the boxes represents the duplicate samples. Bold line represents the*
 310 *mean c_s . The black line shows the limit of quantification (derived by signal to noise ratio,*
 311 *see Table SM-5). B: Derived $c_w(TWA)$ concentrations from generic sampling rates (section*
 312 *2.3), sorted by $\log K_{ow}$. TBZ-OH: hydroxyterbuthylazine, CDZ-DP: diphenyl chloridazon,*
 313 *ESA: ethane oxosulfonic acid, OA: oxanilic acid, TBZ-DE: desethyl terbuthylazine, TBZ:*
 314 *terbuthylazine.*

315 Time-weighted average concentrations calculated from Chemcatchers were generally
 316 lower than aqueous concentrations calculated for parallel PDMS samples and for
 317 compounds in the range of overlapping polarity, e.g., TBZ-DE. There are different potential
 318 reasons: Firstly, sampling rates needed for the calculation of TWA concentrations of RPS
 319 disk have to be adjusted for low flow conditions, but were seldom tested under stagnant
 320 conditions. Literature data point to values down to 0.01 L/d (Grodtko 2021, Münze et al
 321 2015). This value was used for calculation as best available approximation as suggested
 322 by Römerscheid et al (2023). Secondly, for concentrations peaking shortly before passive

323 sampler retrieval, equilibrium concentrations in PDMS may come out higher than TWA
324 concentrations from CCs exposed in parallel.

325 Both samplers yielded the same distribution pattern, namely slightly elevated
326 concentrations at the northeast shore compared to the north bay. Moreover, the pattern of
327 the Chemcatcher results support the source allocation and conclusions on the origin and
328 timing of polar contaminants.

329 All in all, PDMS results can be regarded more reliable in the given application. The
330 exposure time of two months was rather long and the sheets floated directly over the
331 sediment. The amounts collected per PDMS sheet were also a multiple of amounts
332 collected per Chemcatcher, and the sheet thickness of 0.5 mm was similar to diaspore
333 dimensions, a factor of importance for similar uptake kinetics.

334 The pilot trial conditions were already adjusted to experience with passive sampling.
335 However, accounting for stagnant conditions and gradients in the diffusive boundary layer
336 at the sediment-water interface was not trivial. For extended use under these extreme
337 conditions, passive sampling could be further adapted to this very special application, e.g.,
338 by controlling uptake kinetics and adjusting exposure times, accurate positioning of
339 passive samplers relative to sediment surfaces, adjusting passive sampler size to
340 quantification needs, gathering application data to complete the target list and K_{sw}
341 calibration for all compounds measured.

342 **3.2.2 Source allocation: application and atmospheric deposition**

343 A comparison of the detected local distributions and levels allows inferences to origins of
344 interest for the risk interpretation and mitigation options. Lower herbicide levels in the north
345 bay than at the northeast sites were expected, because of the different size of nearby
346 agricultural areas. The distance of the lakeside edge of agricultural areas was about 100 m

347 in both cases, but near the north bay there was only one intensely cultivated field of 3 ha,
348 compared with an agricultural subcatchment of about 30 ha above the sites at the
349 northeast shore, including fields at the catchment margins in 400 m to 800 m distance from
350 shore.

351 The similarity of the levels of the Chemcatcher results at the northeast sites and in the
352 northwest bay were surprising at the first glance, because herbicides were never applied in
353 the northwest. The only herbicide detected in the northwest bay was terbuthylazine (TBZ),
354 which is widely applied at corn cultivation in the region, but only outside the catchment of
355 the lake. Parent compounds pointing to local application were only detected at the
356 northeast sites. The otherwise similar patterns can be attributed to the fact that all
357 compounds detected are known to be transported by atmospheric deposition and to be
358 omnipresent in Europe. Concentrations in air depend on the distance from intensely used
359 areas, and concentrations in rain water remain relatively high over longer distances
360 (Dubus et al. 2000, Kreuger et al 2006, Kruse-Platz et al.2021, Zaller et al. 2022, Machate
361 et al. 2022). Thus, the findings in the northwest bay and a large part of corresponding
362 detects at the other sites can be plausibly attributed to atmospheric deposition.

363 Terbuthylazine and metabolites detected by CC and PDMS show both a tendency to
364 comparably lower levels in the north bay. This trend implies a dependence of benthic
365 concentrations of deposited compounds also on subcatchment areas. The load of
366 herbicides entering the lake with subsurface discharge at a given site depends in fact only
367 on the presence in the respective subcatchment area, irrespective of the way of
368 contamination. Only the load of applied herbicides per subcatchment area may be higher
369 than the one due to deposition. A better differentiation then requires additional information
370 on application. Deposition directly on the lake surface, on the other hand, has to be
371 diluted fastly to non-detectability in the lake water, given concentrations in the ng/L range

372 found in rain water (Kreuger et al 2006) and snow-melt (Maurer et al. 2023). In addition,
373 the remobilization of herbicides from sediments to water is too slow to markedly increase
374 pelagic concentrations. For instance, herbicides experimentally spiked to sediments
375 remained near the detection limit in overlaying culture media for 4 weeks (Polst et al.
376 2023).

377 The poor soils of the sandy catchment of the lake Suhrer See are almost exclusively
378 cultivated with winter crops, mainly with grains, on some fields in rotation with winter rape.
379 The local farmers rely on agency recommendations for herbicide application (LWK-SH
380 2021). Most formulations recommended for autumn application with winter grain contain
381 flufenacet, diflufenican, prosulfocarb, or pendimethalin ($\log K_{ow}$ between 3.5 and 5.4),
382 about half thereof contain diflufenican. All four herbicides were detected by PDMS at the
383 sampling sites.

384 The level of around 45 ng/L of dimethachlor at the site NE-1 might indicate a local
385 application for winter rape cultivation. In the parallelly deployed Chemcatchers, the
386 compound was found at all NE sites near limits of quantification, but only in the first
387 sampling campaign in April which also points to a relationship to autumn application.

388 Terbutylazine (TBZ) and metolachlor, both applied with corn and not locally, can be
389 attributed to deposition only. The regularly detected terbutryn (TBT) is usually denoted as
390 a biocide not approved for agricultural application, thus it would rather be expected in
391 urban runoff. However, TBT can also be a metabolite of TBZ (CLH 2014, Lewis et al.
392 2016). Additionally, TBT is persistent under anoxic conditions (Muir & Yarechewski 1982).
393 Therefore, it can be assumed, that TBT accumulates in sediments following subsurface
394 discharge of TBZ and transformations in anaerobic sediment layers. CLH (2014) states,
395 that the metabolite is more toxic than its mother substance, but considers the risk
396 neglectable because TBT is not found in critical concentration in water containing TBZ and

397 also not in sediments under water containing TBZ. The possibility, that TBT could
398 accumulate in sediments when TBZ containing subsurface discharge passes through
399 anaerobic layers, was not envisaged, the risk hence most likely underestimated. Moreover,
400 TBT seems to be omnipresent, at least in Schleswig-Holstein, where it was found regularly
401 far from biocide sources in other lake sediments (Machate et al. 2021) as well as in
402 running waters (LLUR 2018).

403 Flufenacet was not detected at all sites in spring, where applied the autumn before. If
404 detected, the concentrations were low, contrary to herbicides with higher log K_{ow} .
405 Willkommen et al (2019) correspondingly found that subsurface losses of flufenacet
406 responded quickly to application with high concentration peaks after extreme rainfalls in
407 October 2017 and continued to respond to subsequent rain events on a low level over
408 winter. By comparison, diflufenican and pendimethalin appeared with relatively low loads
409 first, but steadily after every new rain event throughout the sampling campaign up to
410 January. This timing supports a delay of subsurface transports of nonpolar compounds
411 over winter and fits their presence in the lake littoral at the beginning of the vegetation
412 period, i.e., at the time of highest vulnerability of SUM diaspores towards developmental
413 inhibition. Conversely, the bulk of more polar compounds can be assumed to arrive earlier
414 in winter in the littorals.

415 All in all, the passive sampler results prove the presence of locally applied and of
416 deposited herbicides in the benthic boundary layer on lake sediments in 2 m depth with
417 SUM losses in spring 2022 after extreme precipitation in February. The distribution
418 patterns further suggest a subsurface transfer of applied and deposited herbicides alike
419 from sub-catchments.

420 **3.3 Chemical ecotoxicological risk assessment**

421 **3.3.1 Ecotoxicologically relevant compounds and properties**

422 Sensitivity data for the inhibition of diaspore development in spring were missing. The
 423 evaluation was thus based on the nearest surrogate standard data sets of EC50 (green
 424 algae 72h, growth). The use of an assessment factor (AF) of 1000 on short-term toxicity
 425 data is recommended for the derivation of a protective threshold value (EC 2018, Escher
 426 et al. 2021). Measured concentrations of a compound to its EC50 or toxic units (TU) of
 427 0.001 therefore have to be considered relevant. The verified risk or probability of adverse
 428 effects increases with the exceedance of this threshold for TU.

429 With a maximum detected concentration of 200 ng/l for DE-TBZ, compounds with EC50
 430 over 1 mg/L yield TU below the threshold set by the AF of 1000. The fungicide
 431 tebuconazole and all metabolites except TBZ-DE were thus excluded from further
 432 consideration. On this base, the PDMS results comprised all potentially relevant
 433 compounds. Concentration ranges, EC50 and general information are listed in Table 1.

434 *Table 1: Detected, ecotoxicologically relevant compounds with EC50 < 1 mg/L. Data were*
 435 *derived from PPDB, if not stated otherwise.*

Compounds	properties				PDMS Results			
	log K_{ow}	Inhibition of	Crop or metabolite (MT)	DT50 [d]	EC50 ¹⁾ [µg/L]	$C_{w, min}$ [ng/L]	$C_{w, max}$ [ng/L]	detected n/8 sites
Dimethachlor	2.17	cell division	rape	3-30	6.5	4	70	5
TBZ-DE	2.30	photosynthesis	MT 1	54	140	57	218	8
Metolachlor ²⁾	3.40	cell division	corn	20	57	12	22	8
Terbutylazine	3.40	photosynthesis	corn	72	12	35	80	8

Flufenacet ³⁾	3.50	cell division	grain	20	2	3	10	2
Terbutryn ²⁾	3.66	photosynthesis	MT 26	52-74 (650) ⁴⁾	2.4	8	17	8
Diflufenican ³⁾	4.20	lipid synthesis	grain	65-95 (621) ⁵⁾	0.25	4	11	8
Prosulfocarb	4.48	lipid synthesis	grain	12	49	6	34	8
Pendimethalin ³⁾	5.40	cell division	grain	182	4	1	4	8

1) EC50 green algae, 72h, growth; 2) not approved; 3) candidate for substitution;

4) Muir & Yarechewski 1982; 5) BVL Zulassungsbericht Falcon 2015

436

437 Three of the four nonpolar herbicides, that were mainly applied in autumn at local winter
438 grain cultivation, are classified as "candidates for substitution" (CfS), according to the
439 pesticides properties data base (PPDB). CfS fulfill two of three criteria for a classification
440 as a persistent, bioaccumulative and toxic (PBT) substance and are subject to revocation
441 by EC legislation (EU 2009, Annex II, 4). The detection on sediment surfaces falsifies the
442 assumption of immobility of nonpolar compounds in soils, that underlies *per se* problematic
443 approvals of formulations, that contain CfS like the very toxic diflufenican (BVL 2009).

444 The half-life time (DT50) stands for the risk of persistence. Sources besides standard data
445 sets like PPDB (Lewis et al. 2016) may indicate a far higher persistence. Moreover, EC50
446 from different standard data sets may deviate within a range of one order of magnitude
447 due to respective positions of test organisms in species sensitivity distributions. The
448 consequences are discussed below in the context of risk verification and validation.

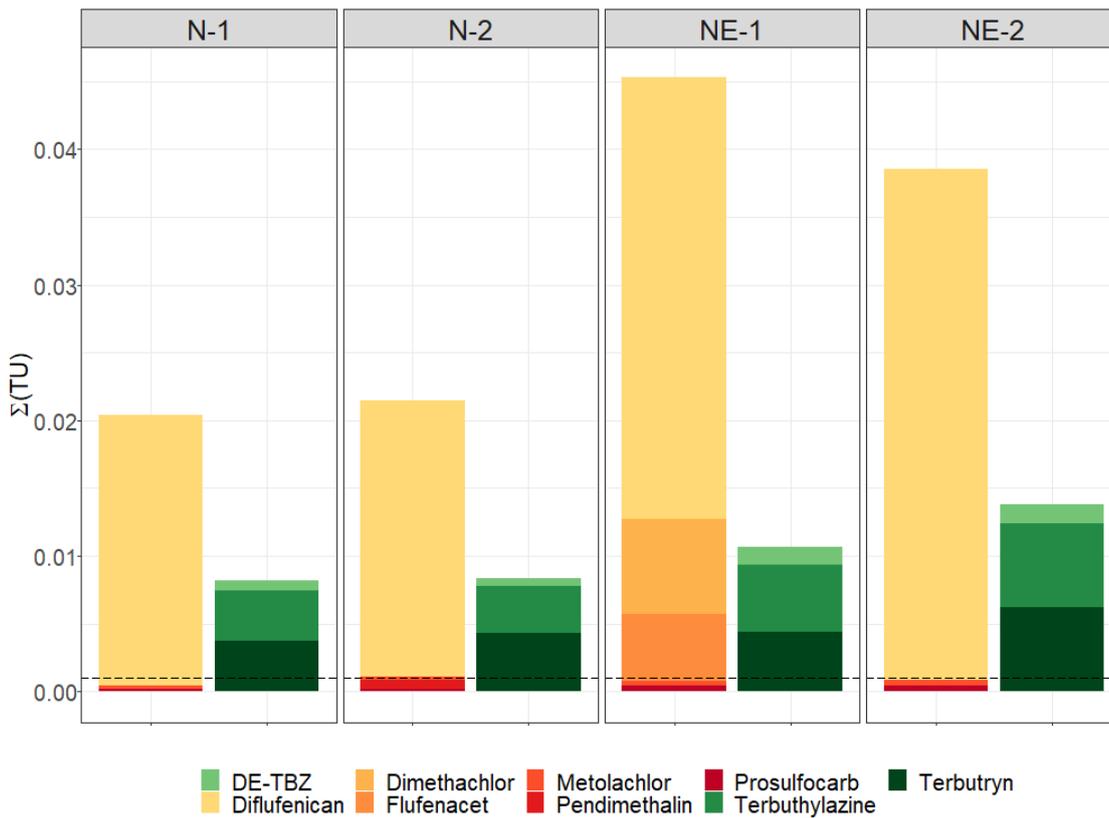
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3.3.2 Local distribution of toxic units

450 Concentrations of detected compounds with similar modes of action related to their
451 standard EC50 can be summarized to denote combined effects as they imply comparable
452 acute effects (TU approach). For the assessment of chronic mixture toxicity, the same AF
453 apply for summarized toxic units as for single substances (Backhaus & Faust 2012, EC
454 2018).

455 TBZ and metabolites inhibit photosynthesis. All other target compounds detected suppress
456 developmental stages. The summarized TU for inhibition of developmental stages are in
457 the range of 0.02 to 0.045. This was mainly due to diflufenican (from 75 to 97% over all
458 exposure sites, when based on EC50 from PPDB, Figure 4). With the EC50 of 0.25 µg/L,
459 TU around 0.02 to 0.03 were calculated for mean c_w per site. Dimethachlor and flufenacet
460 contributed to the inhibition of developmental stages at NE-1 with a TU around 0.005 each.
461 In addition, flucenacet was detected in the north bay with a TU near 0.001, i.e. still
462 potentially relevant. Flufenacet was also applied at the field near the north bay the autumn
463 before and is regularly used on fields above the NE-sites.

464 The potential for inhibition of photosynthesis was lower. The summarized TU of TBZ and
465 its active metabolites were above 0.01 at NE-1 and 2 and below at N-1 and NE-2 mainly
466 due to terbuthylazine and its metabolite terbutryn. Both contributed about equally to the
467 summarized TU (fig.4)



468

469 *Figure 4: Summarized toxic units (cf. equation 4) with EC50 from PPDB for herbicides*
 470 *suppressing plant development (red/yellow columns) and herbicides inhibiting*
 471 *photosynthesis (green columns).*

472 Different data bases may yield different lowest EC50 (green algae, 72h, growth). For
 473 instance, for diflufenican, 0.071 µg/L are denoted by the HSE risk report (2021) and
 474 0.6 µg/L by ECHA (2019). The PPDB value lies in the middle of this range of the species
 475 sensitivity distribution. The sensitivity distribution of macrophyte diaspores may come
 476 close, especially for charophyte diaspores, judged by common properties (belonging to
 477 green algae and diaspore sizes). EC50 of macrophyte diaspores and their positions
 478 relative to the sensitivity distribution of standard test organisms are unknown, the mean
 479 value of PPDB can be considered as a best guess for congruence. Assuming, that the
 480 uncertainty of the real EC50 spans a range similar to the data base values, TU for
 481 diflufenican may range from 0.01 to 0.1, implying a high to even acute risk for adverse

482 effects. The high error margin of diflufenican (due to the approximation of the K_{sw}) widens
483 the uncertainty range further, indicating a likelihood for a still higher or lower risk.

484 So far, it has to be concluded from the TU approach: i) the detected herbicides are almost
485 all relevant on base of TU around 0.001 or AF 1000 as threshold, ii) locally applied
486 herbicides pose with AF between 50 and 25 a high risk for inhibition of plant development,
487 diflufenican being the main driver, and iii) terbuthylazine, that is not locally applied, and its
488 metabolite terbutryn, pose with AF around 100 a lower risk for photosynthesis inhibition.

489 The failure of the plant development observed in the field validates the high risk verified by
490 the chemical risk assessment for herbicides with the fitting mode of action. But a
491 contribution of other potential factors to the manifested biological effect cannot be
492 excluded. An effect of photosynthesis inhibition in absence of green plants can be
493 excluded. But switching from use of energy reserves in diaspores to photosynthesis is
494 most likely a most vulnerable stage in the life cycle of SUM. In this stage, sensitivities for
495 photosynthesis inhibition should be higher than known for grown-up SUM. For
496 angiosperms, EC50 near 10 to some 100 $\mu\text{g/l}$ are reported (Lewis & Thursby 2018). In
497 addition, uptake from sediments has been reported, for instance of terbutryn which is
498 rather toxic (Turgut 2005). The concrete effect, that TBZ and terbutryn might provoke at
499 the sediment surface, is thus unclear, but not neglectable with an AF around 100.

500 The recommendation of the high AF (EC 2018) pays tribute to the fact, that conclusions
501 from acute chemical data to chronic toxicity and derived extrapolations used in risk
502 verification are *per se* highly uncertain (Fent 2003, Van den Brink et al. 2008, Fairbrother
503 et al. 2016, ECHA 2012). The recommendation (EC 2018) also integrates the experience
504 that risk validations by monitoring data tend to indicate effects at lower concentrations than
505 anticipated by prognostic extrapolations (Malaj et al 2014, Liess et al. 2019, Schäfer et al.
506 2019). The AF 1000 can thus be considered a feasible compromise. For concrete

507 situations, the guideline (EC 2018) concedes the possibility of unusual risks for
508 environmental effects, but requires a specification in such cases, especially when
509 protection goals are at stake. Liess & Gröning (2024) demonstrated that "unusual risks" of
510 ultra-low concentrations have in fact to be envisaged. For mayflies exposed to pulses of
511 pyrethroid insecticides with a concentration of 1 ng/l, they found "that even at
512 concentrations four orders of magnitude below the acute LC50, there was a pesticide-
513 related mortality of 15 %."

514 In the given case, circumstantial evidences point in fact to additional risks missed by the
515 TU approach. First of all, compounds with $\log K_{ow} > 3$ (concerning most of the detected
516 herbicides) generally tend to accumulate in sediments to a degree requiring more lines of
517 evidence for deriving toxicity standards (sediment toxicity tests, aquatic toxicity tests in
518 conjunction with equilibrium partitioning, bioassays with extracts from exposed passive
519 samplers and field/mesocosm studies) (EC 2018, Chapman & Hollert 2006, Escher et al.
520 2021). The widely used pendimethalin was found at all four sites, barely reaching a TU of
521 0.001. But, its relatively large hydrophobicity ($\log K_{ow} = 5.4$) implies a low partitioning to
522 lake water in spite of a high presence and a very steep equilibrium gradient at the
523 sediment interface. This poses a very high risk for time-cumulative toxicity at the sediment
524 surface, due to increased binding of toxic molecules to enzymatic receptors (Escher et al.
525 2004, Liess & Gröning 2024, Sanchez-Bayo & Tennekes 2020), which is out of focus of
526 the toxic units concept. With the very steep gradients in the diffusive boundary layer and
527 diaspores with a size in the range of 0.5 mm lying in it, exposure concentrations may also
528 systematically exceed concentrations around passive samplers floating near sediment
529 surfaces. Discharge peaks of more mobile compounds might have been missed during the
530 sampling in spring, because they peak rather shortly after application in autumn
531 (Willkommen et al. 2019). However, short-term peaks can cause long lasting effects (Liess

532 & Beketov 2011). Especially wintergreen Chara meadows may be affected by such winter
533 peaks.

534 Multiple effects beyond summarized TU are also out of focus of the chemical risk
535 verification. Some herbicides potentially adding to the TU might have been missed for
536 example by the measurements, though the target list was already adapted to main
537 herbicides known to be applied locally. Combined effects of dissimilar acting chemicals are
538 moreover known to be greatly underestimated by the TU approach (Shahid et al. 2019,
539 Liess et al 2020). And there is an observation hinting to a potential combined effect,
540 namely an abnormal occurrence of white instead red to black oogonia in late summer. The
541 phenomenon could be due to photosynthetic inhibition leading to reduction of starch
542 buildup in diaspores, thus decreasing their vitality and chance to develop in the next
543 spring. Generally, organisms tend to reduce reproduction efforts under stress (Fent 2003).
544 This tentative interpretation is of course speculative, but depicted to illustrate, that it cannot
545 be excluded that a given TU sum might be more relevant in reality than anticipated, this or
546 another unforeseen way. Indirect effects of xenobiotics besides herbicides are also not
547 covered by TU, but important for regulations within the community associated with SUM
548 (Jeppesen et al. 1998). For instance, bioturbation by chironomids is crucial especially for
549 charophytes lacking aerenchyma (Wetzel 1975) and glyphosate, found in Suhrer See
550 sediments (Machate et al. 2021), affects gut microbiomes of insects causing
551 immunodeficiency (Motta et al. 2018). In addition, community effects alone like
552 concurrence, in the case given between charophytes and angiosperm SUM, may increase
553 sensitivities of more sensitive species by a factor of 10 (Liess et al. 2013).

554 Up to this point, the result consolidates the hypothesis, that subsurface transfers of
555 herbicides from subcatchments affect SUM. The conclusion is already backed by the risk
556 verification on grounds of TU, and further supported by additional risks in the given

557 situation. Especially nonpolar herbicides applied for winter grain cultivation and the long-
558 term exposure on lake sediments endorse an up-rating of risks. Extended passive
559 sampling could contribute to clarification, best in connection with sediment toxicity testing
560 by bio-analytical tools and extracts of exposed passive samplers (Escher et al. 2021).

561 Transparency with respect to uncertainties is key where the severity of manifested effects
562 requires clarity about potential influences, especially with respect to the necessarily
563 subjective component of every assessment (ECHA 2012). Following the guideline, a
564 qualitative assessment is compiled in Table 2. The overview assembles sources of
565 uncertainty, estimated tendencies towards an under- or overestimation and possibilities to
566 reduce respective uncertainties. The uncertainty inferred by extrapolations to chronic
567 toxicity and by properties of benthic boundary layers is assessed to infer a possible
568 underestimation of risks spanning two orders of magnitude. The uncertainty for unknown
569 elements like sensitivities of diaspores is estimated to be very high in either direction.

570 Overall, the risk assessment on base of TU is more likely under- than overestimated,
571 which at least confirms the likely contribution of detected herbicides to the SUM losses at
572 the exposure sites in spring 2022.

573 Table 2: Qualitative assessment of uncertainties in passive sampling and toxicity
 574 evaluation. Impact on toxicity interpretation and possibilities of reducing uncertainty. A
 575 tendency to a higher or lower risk, inferred by an influence is denoted by plus and minus
 576 signs, respectively. The number of signs denote the estimated order of magnitude. After
 577 ECHA (2012, tab. R.19-1, 19-3)

source of uncertainty		direction & magnitude	reduction of uncertainty
general	specific		
K_{sw} calibration	available: batch experiment sd 10% to 20%		
K_{sw} interpolation	from calibration line fit, range: -50% to +200%	+/-	Calibration
	gradient in diffusive boundary layer	++	exact positioning
detection	different seasons and SUM stages	+ + / - -	extended sampling,
	undetected compounds,	+	suspect /nontarget screenings
source allocation	local application vs. deposition	+/-	information from farmers
hydrology	timing and spatial extent of contaminated LDG plumes, preferential pathways	++/--	extended sampling, hydrolog. modeling
acute effects	EC50 green algae, 72h sensitivity of diaspores	+/- ++/--	data base testing!
chronic effects	time-cumulative, combination, trans-generational and community effects	++	mesocosms, higher tiers, validation

sediment toxicity	accumulation of relevant herbicides ($\log K_{ow}>3$), long lasting exposure	++	bioassays with passive sampler extracts
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578

579 The uncertainty of the assessment could be reduced in a next step by subsequent
580 experimental approaches. Passive sampling could further play a pivotal role, especially
581 after implementation of the experience gained with the novel and challenging exposure in
582 diffusive boundary layers. An extended sampling over seasons and in other than worst
583 case situations would be revealing, best with target lists adapted to information on
584 pesticide application and with biotests with passive sampler extracts (Escher et al. 2021), if
585 possible. A nontarget screening for agricultural xenobiotics would be rewarding to disclose
586 potential unexpected and indirect effects.

587 The so far open question of potential additional or even other main causes, that may
588 contribute to the observed SUM responses, has to be answered independently. This task
589 requires an extended validation, that is a recurrence to a holistic retrospective
590 assessment.

591 **3.4 Integration of the passive sampler result into the ecological context –**
592 **consistency and implications for nature protection**

593 To cure fatalities like losses of endangered charophytes in a nature protection area, one
594 needs to know the cause. Multiple lines of evidence led to the postulate of a causal
595 relationship with subsurface transfers from agricultural areas to lake sediments, that is to
596 the biotope where SUM develop. Passive sampling confirmed the presence of herbicides
597 on sediment surfaces. The prognostic chemical assessment verified a possible inhibition of
598 SUM development by applied herbicides and an unexpected, albeit lower and unclear risk
599 by deposited herbicides. The in fact missed SUM development validates the verified risk to

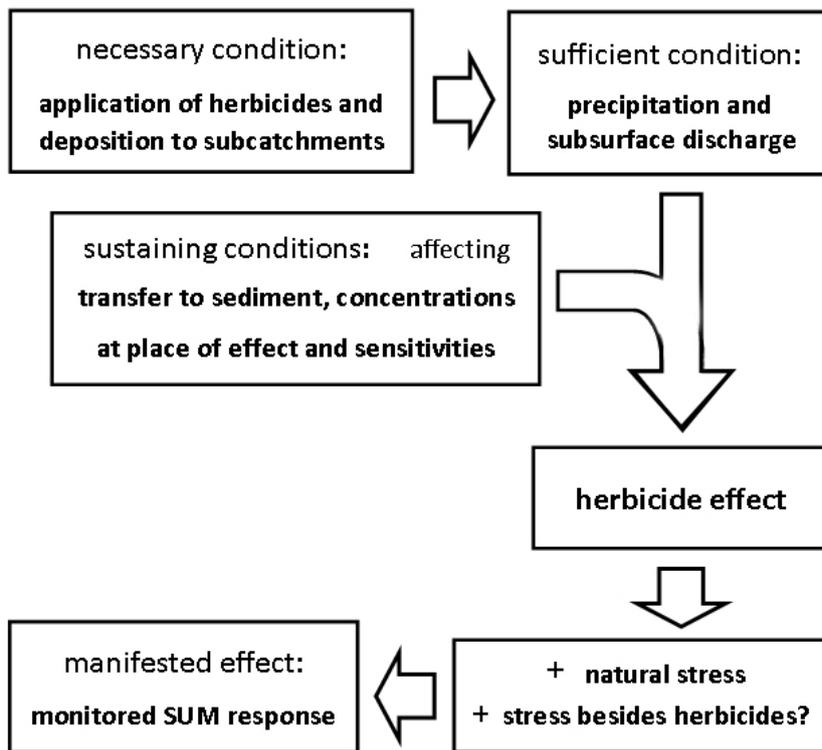
600 a certain extent. It can be concluded, that inhibition of developmental stages by herbicides
601 contributes to the observed effect, but not to what extent.

602 **3.4.1 Causal field and stress addition: Implementation of passive sampling results**

603 Causal attribution allows to identify the probability of the contribution of a main stressor to
604 a manifested effect and is the method of choice for complex systems. The base of the
605 probability consideration is a conceptual flow chart assembling observations and
606 interpretation by expert knowledge in a logical manner, including semi-quantitative,
607 qualitative and uncertain information (Hamilton et al. 2015, SM 3.2). Monitored SUM
608 stages can be interpreted as stress responses in a causal field that represents the current
609 state of knowledge (fig. 5) and is based on ecological stressor concepts (Liess et al. 2016,
610 Odum 1985, Perujo et al. 2021).

611 The passive sampler results strengthened pivotal postulates and added the new aspect of
612 a potential relevance of herbicide deposition. The results obtained in a worst case situation
613 allow generalisations that can be integrated to local stress profiles in other situations and
614 checked for plausibility with monitoring data (see below). Counterchecks with the whole
615 lake experience enable an extended risk validation and outline of research and mitigation
616 priorities.

617 First, it is to infer from the passive sampler results, that herbicides can be transported from
618 subcatchments to sediments all around the lake. Second, application of herbicides in any
619 subcatchment can be considered bearing a risk high enough to contribute to SUM losses
620 in phases of high discharge. The question, to what extent, should thereby kept in mind.
621 Likewise, a low risk for unspecified deposition effects can be assumed for sites without
622 agricultural subcatchments in phases of high subsurface discharge. Third, phases with no
623 discharge should imply no herbicide stress, even at sites with agricultural subcatchments.



624

625 *Figure 5: Conceptual flow chart and causal field for observed SUM responses. The terms*
 626 *"necessary, sufficient and sustaining conditions" highlight the use of formal logic. The*
 627 *concept of sustaining conditions, introduced to address causation in situations where*
 628 *cause and effect are distant in place and time (Minnerop & Otto 2020), is a key for causal*
 629 *attribution in complex local situations.*

630 **3.4.2 Plausibility of causation: matching site-specific stress profiles** 631 **with known SUM responses in a whole lake context**

632 SUM respond to all components of stress in a given situation. Most elements of man-made
 633 stress known to affect SUM in other lakes (fishery, boating, eutrophication, urban runoff,
 634 shore modifications) can be excluded for the virtually pristine lake Suhrer See. In 1991,
 635 Frenzel still found charophytes all around the lake except for one site with an exceptional
 636 steep underwater slope (30%, fig. SM-8) with *Potamogeton perfoliatus* only (Frenzel

637 1992). For the wide flats in the North, a few, later vanished *Chara tomentosa*, a typical
638 species of wintergreen *Chara* meadows, were mentioned. The natural stress level is thus
639 graded depending on locally prevailing underwater slopes and is correspondingly inserted
640 into the stress profiles in table 3. If natural and herbicide stress are the main relevant
641 stress components in a given situation, their sum should be comparable to the level of
642 ecological stress indicated by SUM responses.

643 The summers 1997 and 2017 were both extremely wet (cf. table SM-2). The SUM
644 responses (table 3, upper part) show a historical overall increase in man-made stress and
645 the summation of natural stress and herbicide stress is plausible as reason at all locations.
646 An unknown stress cannot be excluded, but there is no cogent necessity for one.

647 Table 3: *Local stress profiles and plausibility with respect to manifested, gradual stress*
648 *responses of SUM (A wintergreen Chara meadows, B summer only Chara, C angiosperm*
649 *SUM, D devastation). Herbicide stress was inserted as being high or low at sites with or*
650 *without agricultural subcatchments, respectively, and at times of high subsurface*
651 *discharge (following the prognostic assessment on base of the passive sampling results).*

Historical increase of stress levels				
Comparison of local SUM responses in two extremely wet summers.				
sites	1991 ^a	assessed stress profiles		2017 ^b
	SUM	natural stress	herbicide stress	SUM
north bay	A	very low	low	A
NE-2	B	low	high	D
else	B	low to mean	no agricult.: low agricult.: high	C D
site with steep slope	C	high	high	D
Effects of deposited herbicides^c				
Comparison of SUM responses in summer 2019 (dry) and summer 2021 (wet)				
sites	2019 dry	assessed stress profiles		2021 wet
	SUM	natural stress	herbicide stress	SUM
3 northern transects	B	very low to low	low	B to C
3 southern transects	B to C	low to mean	low	C
^a after Frenzel (1992) ^b data from Krambeck 2022 ^c after lanaplan (WFD reports)				

652 The lower part of table 3 reveals the effect of deposited herbicides, since none of the six
653 transects monitored are influenced by discharge from agricultural subcatchments. The
654 data were adopted from lanaplan (WFD reports) and translated into stress response
655 stages (for original coverage grades see table SM-3). There is a tendency to switch to a
656 state C under the influence of an additional low stress. In general, charophytes are widely
657 replaced in southern parts of the lake by a small-leaved *Potamogeton* (fig. SM-9) and tend
658 to disappear in wet summers at sites where they are still found in dry summers.

659 So far it can be concluded, that, if there should be some missed potential stressor besides
660 herbicides it has to be bound to discharge as well (Hill's criterion No. 1b, cf. SM 3.1).
661 Acidification might be thinkable because it could modify the mobility of compounds in
662 weakly buffered soils and entail toxic effects. Given the contemporary atmospheric
663 deposition of ammonia from livestock rearing (Bittersohl et al. 2014), acidification should
664 be kept in mind as a potential sustaining factor influencing risks by subsurface discharge.

665 However, the north bay experience (SM 1.2) is a strong independent line of evidence for
666 herbicides being a main stressor, because SUM responded in a remarkably prompt and
667 logical manner to changes in herbicide application (SM 1.2): A chemical removal of fallow
668 vegetation on a nearby field (fig. SM-2) in autumn 2019 was followed by an extraordinary
669 decay of the before wintergreen *Chara* meadow in the whole bay (fig. SM-3 and -4). In
670 autumn 2020, an interculture was sowed instead of herbicide application. SUM partly
671 recovered in 2021, but with an appearance of *Potamogeton crispus*, a disturbance
672 indicator never noted before, in the inner part of the bay. That was especially alarming,
673 because a residual stand of *Chara subspinosa*, a rare species and indicator of very good
674 conditions, prospered up to 2019 at the same site (fig. SM-5 and -6). After application of
675 flufenacet, diflufenican and chlortoluron on the critical field in autumn 2021, the inner and
676 western parts of the bay stayed bare up to July 2022. The spatial patterns of SUM
677 responses in the north bay hint to an arrangement of different subsurface discharges from
678 the surroundings (fig. SM-5). The indicative value of SUM for groundwater entrances to
679 lakes has long been recognized (Rosenberry et al. 2000).

680 One type of disturbance observed in front of the north and northwest bay cannot be
681 subsumed in the causal field valid for the other monitored SUM losses. Sometimes, zones
682 of one to forty meter diameter with sulphur fog appear in summer within vital *Chara*
683 meadows, followed by decay and bare ground, recolonized later and firstly by

684 angiosperms like *Ceratophyllum submersum*. The phenomenon is not understood. It might
685 be related to a disturbance of biogeochemical sulphur cycles and of bioturbation normally
686 oxygenating sediments (Jørgensen et al. 2019, Hupfer et al. 2019). The observed decay
687 might be due to excess hydrogen sulphide being toxic, especially for charophytes lacking
688 aerenchyma. The occurrence of dead zones in transition to deeper water suggests a
689 connection with entrances of groundwater. A causal relation to acidification might be
690 possible via mobilisation of aluminium sulphate in soils and transport to receiving waters
691 (Bittersohl et al. 2016).

692 The northeast shore experience (SM 1.3) reveals small scale variations, comparably lower
693 influence of surface discharge and a failure of a mitigation measure. The passive sampling
694 result of similar TU at NE-1 and NE-2 is revealing in two respects. First, the different
695 proximity to two short drain creeks is irrelevant (cf. fig. SM-7). Second, the SUM response
696 indicates higher stress at NE-1 (permanent D) than at NE-1 (C-D in dependence of
697 precipitation). The explication is a steady narrowing of the littoral from NE-2 towards NE-1
698 and a resulting higher natural stress at NE-1. Frenzel found a corresponding decrease of
699 *Chara* sp. in 1991, from a mass occurrence at NE-2 to a mere presence at NE-1.

700 The contemporary SUM response to the creek inlet in between NE-1 and NE-2 is
701 remarkable. A dense stand of angiosperms is found there in normal summers that almost
702 mirrors the creek delta and with a sharp transition especially to the permanently bare
703 ground towards NE-1. In front of the creek delta, devastation occurs at very high discharge
704 only. The creek in fact delivers herbicides. For instance, diflufenican concentrations
705 ranged from 13 to 23 ng/l in autumn 2020 (Höinghaus 2022). The dilution to lake water
706 seems to confine effects to the immediate vicinity of the inflow. The turbulent inflow should
707 also destroy otherwise high and stable partitioning gradients in diffusive boundary layers.
708 A clay lens at the creek inlet might have blocked some subsurface discharge in addition.

709 The creek on the other side of NE-1 drains a depression within an area taken out of
710 production since 2019. The mitigation measure worked insofar as mainly uncritical
711 metabolites were still found in the outlet in autumn 2020 (Höinghaus 2022). But it failed
712 with respect to the intention to cure the permanent loss of SUM. The equally high and
713 relevant herbicide concentrations at NE-1 and NE-2 confirmed the after all self-evident
714 explanation, that herbicide contaminated discharge from the surrounding subcatchment of
715 around 30 ha must have passed underneath the 3 ha buffer zone installed.

716 **3.4.3 Resulting options for biodiversity protection and evaluation by means of** 717 **ecotoxicological indication**

718 The example shows, that the protection of SUM against subsurface contamination requires
719 longer-ranging measures than existing and familiar for protection of aquatic biota against
720 surface runoff. Mitigation of atmospheric deposition is even further out of reach. But the so
721 far assembled knowledge yields some starting points and priorities for concrete measures
722 and pragmatic next steps. First, mitigation should not start at the worst but at the still best
723 site, that is the north bay in this case. To reduce the stress in the north bay to a level on
724 which a chance for a recurrence of rare charophytes is in sight, should be feasible. Not to
725 apply the main risk driver diflufenican on the critical field could already suffice and would
726 be worth a try. Responses of the SUM to what will be cultivated next should be anyway
727 monitored, best in connection with information on applied herbicides. Experience with real
728 environmental effects of herbicide application are of general interest and should be gained
729 under different precipitation regimes if possible. The actual drone supported monitoring
730 (current project on honorary base) should thus merge into a long-term routine.

731 To see and recognize, what is going right or wrong on the long run, is a most important
732 precondition for further understanding and mitigation. But, current WFD routines are
733 focused on eutrophication risks (Poikane et al.2020), and the German routine for SUM

734 (Schaumburg 2014) is also not designed to cope with SUM losses in clear lakes.
735 Nevertheless, the data collection pays attention to charophytes, that is to the most
736 sensitive group, and thereby allows ecotoxicologically meaningful interpretations (for
737 instance in context with the north- south gradient, cf. table SM-3). In detail, the assembled
738 data are of high interest, but would need a little upscaling for ecotoxicological indication.

739 **4 Conclusion**

740 Herbicides are present on lake sediments in ecotoxicological relevant concentrations. All
741 lines of evidence point to an origin by application and deposition in subcatchments,
742 followed by subsurface discharge and eventual accumulation in sediments, especially of
743 nonpolar herbicides.

744 The result challenges current paradigms and concepts of risk assessment and
745 environmental protection: i) Ecotoxicological effects cannot be excluded in lakes due to
746 dilution to non-detectability (LLUR 2018). ii) WFD indices for eutrophication and risk
747 assessment routines fail (Brown et al. 2016, Poikane et al 2020, Schaumburg et al. 2014,
748 Weisner et al 2022). iii) Assumptions underlying approval routines for the detected risk
749 drivers diflufenican and terbuthylazine (immobility in soils and no accumulation, cf. chapt.
750 3.2) are falsified. iv) Distances of fields 100m from shore and the ineffectiveness of taking
751 a partial area out of production further render current buffer zone concepts inefficient.
752 Subsidy elements like buffer stripes hence fall too short for mitigation, like in many other
753 nature conservation areas where xenobiotics are omnipresent too (Wolfram et al. 2023).

754 For the time being, it remains to pragmatically concentrate efforts on sites with the best
755 chances for a comeback of endangered species and to collect further experience with
756 SUM responses to ecotoxicological stress. An extended application of passive sampling in
757 other seasons and instances of lower stress responses of SUM could reduce

758 uncertainties, best in combination with biotests with passive sampler extracts (Escher et al.
759 2021). Moreover, investigations of sediment processes and hydrological influences could
760 further consolidate the causal field.

761 The holistic consideration of plausibility and probability of causation (see SM 3) turned out
762 to be a workable approach to risk validation and to pragmatic recommendations for the
763 protection of endangered species. The example shows: Biodiversity protection has to
764 begin *ex post*, i.e., with recognition of biological indications for man-made stress, followed
765 by an interplay between i) probabilistic causal attribution, that enables to pose the right
766 questions, ii) answering the arising key questions by traditional mechanistic methods and
767 iii) trying and evaluating measures on the base of the available state of knowledge.

768

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777

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