

**COMITÉ INTERNATIONAL DE LA CULTURE DU HOUBLON**  
INTERNATIONAL HOP GROWERS' CONVENTION - INTERNATIONALES HOPFENBAUBÜRO  
*www.ihgc.org*

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IHGC, Secretariat on 14. August, 2020

Dear Sir or Madam:

On behalf of the hop growers of the world, we are writing to express our collective concern over the European Union's current pesticide policy and its potential impact on our industry. These comments are submitted by the International Hop Growers' Convention (IHGC), which safeguards the common interests of hop growers and hop merchants worldwide. IHGC's primary areas of focus include scientific, marketing, and regulatory issues.

Hops are a key ingredient of beer and are grown throughout the world. Europe and the United States account for over 80 percent of world hop production, but hops are also grown in Canada, Australia, New Zealand, China, Japan, Ukraine, South Africa and Argentina.

Hop growers are stewards of the land and responsible farmers. We seek to sustainably and successfully grow our crop each year. Hops have perennial rhizomes that produce annual bines bearing the crop (hop cones are the flowers of the female hop plant). The bines are supported by a trellis system throughout the growing season and are cut down to facilitate the stripping of the cones during harvest.

During its growing season, hops are subject to numerous plant protection challenges from insects and fungal diseases to viruses and competition from weeds. Hop growers address these challenges through Integrated Pest Management (IPM) systems which involves monitoring and identifying potential plant health concerns early and using appropriate methods (chemical and non-chemical) to treat any issue as recommended by qualified pest control advisors. When pesticides are needed in a pest situation on hops, growers use the appropriately recommended product, follow regulations specified on the label of the pesticide, and use the least amount of product necessary to treat the issue properly.

For the last two decades, the world's hop industry has sought to continually improve its IPM measures. Some areas have developed early warning systems for likely pests and weather-based disease prediction models. Mechanical alternatives for weed control and basal defoliation are applied. The industry has also sought the development of new crop protection products, many of which are reduced-risk compounds. The hop industry also seeks to improve sustainability through the use of bio-pesticides where possible, breeding programs to develop resistant germplasm, the use of virus-free planting stock, and improved irrigation systems to grow a healthy crop.

Still, despite these positive and ongoing developments, appropriate use of approved pesticides plays a critical role in producing a healthy crop. For the last decade, the European Union has applied a precautionary approach to pesticide reviews, as opposed to a risk-based assessment used other countries around the world as described in the Sanitary and Phytosanitary Agreement of the World Trade Organization. The result has been the withdrawal of numerous crop protection materials for use in the EU, which has affected European hop growers.

Moreover, often the subsequent reduction from these withdrawals of the associated EU maximum residue levels (MRLs) to a default tolerance, makes the crop protection product unavailable for use on hops to be shipped to the EU.

These decisions are having important negative consequences. Growers in Europe have fewer options to address pest pressures, and as a result, yields are falling and pest resistance is developing to remaining available products which in turn renders the IPM system almost obsolete. Outside the EU, hop merchants are restricting product usage on hops even though they are domestically legal to apply. These merchants fear a pesticide residue violation of newly reduced European Union MRLs. Again, this means fewer crop protection products to address pest issues and increased resistance for the remaining products. The situation is getting worse each year with the EU's continued withdrawal of pesticides. With hop products remaining in channels of trade for many years, loss of a key MRL may result in a substantial volume of product produced prior to the change no longer being legal to ship to European brewers who are relying on this important ingredient.

Hops are a small but important agricultural commodity. Finding crop protection products that work and obtaining approval for use on our crop is difficult. Industry officials spend years working with pesticide registrants and governments to obtain approval of each crop protection product. When those products are no longer allowed to be used or their MRL is lowered, the hop industry is left with few alternative options.


As noted above, a further challenge for hops is that the crop and its processed products can be held in storage for several years before being marketed. This means a crop can be treated with a pesticide when it is completely legal in the EU, but when marketed, that product has been withdrawn making what was once a legal crop non-compliant. This is the "channels of trade" issue and desperately needs to be addressed to avoid trade disruptions. If a crop was treated with a crop protection product when it was legally approved, that crop should be allowed to be marketed whenever it is sold, even if the crop protection material and MRL has subsequently been withdrawn. A crop should not be legal when produced and then illegal when sold.

The International Hop Growers' Convention requests that the European Union return to a risk-based pesticide assessment similar to standards used by the rest of the world following the SPS Agreement. Such a policy allows for crops to be responsibly and sustainably grown, while continuing to protect consumer health.

If the European Union is determined to continue to apply a hazard-based approach to crop protection products, the IHGC seeks as long a transition time as possible to allow the hop industry to develop alternative methods for growing the crop. This will take time and research, and cannot be accomplished in a year or two.

Finally, IHGC asks the European Union to adopt channels of trade provisions that allows product produced with legal pesticides at the time to remain legal throughout its distribution and consumption regardless of changes to pesticide standards after production.

Thank you for your consideration of this request.



Leslie A. Roy  
IHGC President