

Update on MRL Harmonization Situation for Hops

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A. EU Updates

We continue to closely monitor MRL changes in the European Union. The following MRLs have been established in the past few months:

- Pymetrozine (Fulfill/Plenum): EU MRL (0.1 ppm) in effect as of September 2, 2021. US MRL (6 ppm)
- Cyflufenamid (Torino): EU MRL (5 ppm) in effect as of November 3, 2021. US MRL (5 ppm)
- Oxathiapiprolin (Orondis): EU MRL (8 ppm) in effect as of November 3, 2021. US MRL (5 ppm)
- Fluopicolide (Presidio): EU MRL (0.15 ppm) in effect as of November 6, 2021. US MRL (15 ppm)
- Imidacloprid (Provado, Admire, Confidor): EU MRL (at 15 ppm) will be in effect on May 16, 2022. Until that date, current 10 ppm MRL applies. US MRL (6 ppm); while the EU MRL was reviewed and established at 15 ppm, Bayer expects the MRL to be lowered to LOQ in 2022 as this substance is no longer approved for use in the EU.

The **EU Commodity Expert Group on Hops** (CEG) met in October in the Hallertau region of Germany. Our contractors from Bryant Christie attended. EU hop growers continue to face many challenges with further restrictions of crop protection products available for use in the EU. The next CEG meeting is scheduled for February 24-25, 2022 in Brussels.

By occasion of the CEG meeting, BCI also met with the Steering Committee that coordinates the International Hop MRL Efforts for the US Hop Industry Plant Protection Committee (USHIPPC), German Hop Industry Association (DHWV) and the German Hop Grower Association (VDH). The Steering Committee continues to advance international hop MRL issues in markets such as Korea, China, Japan, and the EU. The Steering Committee carried out a thorough review and provided updates on the MRL priorities action items. The current Executive Director of the German Hop Grower Association (VDH), Otmar Weingarten, will retire in early 2022 and BCI met with the new Director Erich Lehmair. The next Steering Committee meeting is likely to take place at the next American Hop Convention in Tampa, Florida in January 2022.

B. Korean MRL Positive List System

The full implementation of the Korean MRL Positive List System will take place on January 1, 2022. That means that all temporary MRLs will expire and the default tolerance of 0.01 ppm will apply in the absence of a permanent MRL. The U.S. hop industry has been actively engaged seeking to establish as many permanent hop MRLs as possible. Through a Washington State Block Grant the industry has been able to support import tolerance applications for priority substances where the registrant decided not to pursue an import MRL.

As of October 28th, there are **51** MRLs that either have permanent hop MRLs or the default tolerance is enough to address trade. In addition, there are **2** proposed MRLs, and **5** import tolerance applications that are currently under review. USHIPPC expects additional hop MRLs to be established ahead of the full system implementation.

C. China

On September 3 the Chinese government established a MRL of 0.01 ppm for acequinocyl/Kanemite on the Beverages category that includes hops. The current harmonized MRL in the US, EU, Japan, Great Britain, Australia, Taiwan, and Korea is 15 ppm, with Canada established at 6 ppm. There is no Codex MRL. This high priority issue has been a focus of our efforts during the past two months.

The Chinese import tolerance application process, which would allow us to simply apply for an import MRL, remains uncompleted without a timeline for setting up such a system. We are at least a year away, likely more. China will sometimes take Codex MRLs as their own, but Codex system is backed up and delayed, so seeking a Codex MRL is at least a four or five-year endeavor. Then we would need to have China adopt that MRL, which would take another year or two. This is a path that is open, but there is a time issue.

During recent meetings in Germany, the Steering Committee discussed this issue at length. Bryant Christie has developed a draft strategy that is currently being finalized that involves gathering data and soliciting support from allies in China to try to see a temporary MRL. Additional details will be provided as efforts proceed.