



Hop Growers Union
of the Czech Republic

January 24, 2024

Mr. Klaus Berend

EU Commission

Directorate-General for Health & Food Safety (SANTE)

Director for Food Safety, Sustainability, and Innovation

Subject: Adoption of a Draft Regulation as regards to maximum residue levels (MRL) for bifentazate in or on hops

Dear Mr. Berend:

Thank you for the follow up letter on the adoption of the draft regulation concerning the bifentazate MRL on hops (SANTE/E4/SS/ai(2024)404836) of 17 January 2024.

It is with great disappointment and concern that the undersigned organizations read this communication of the European Commission's intention to adopt the Regulation towards the end of January 2024. While we appreciate the delay granted beyond standard procedure, the implementation of the draft Regulation in January will cause significant harm to the hop and brewing industries. The hop industry expects over 100 million Euros in losses and the impact for Europe's brewers will be significant as well, at a time when innovation, including through the use of diverse hop varieties, is driving growth in the beer market, particularly for small and medium-size brewers who still face many challenges in post-Covid recovery. Once the Regulation is published, hop sales of current stocks from 2022 and earlier will effectively cease. The six-month transition period will be irrelevant as beer will not be able to be placed on the market using hops that have been treated with bifentazate.

The current application underway to change the conditions of approval of bifentazate under Article 7 of Regulation No (EC) 1107/2009 is advancing through the review process, which is likely to take an additional two years. Even if expedited, the costs to the hop and brewing industries during this period will be enormous. Loss of product quality and cold storage costs of current stocks make it impossible to keep them for future commercialization, resulting in a total loss for the hop and brewing industries. The latter would also no longer be able to market beers produced with their existing hop stocks, but which are not yet put on the market, meaning the destruction of these beers and any remaining hop batches.

Therefore, the International Hop Growers' Convention, the German Hop Industry Association, the Hop Growers of America, The Brewers of Europe and the Hop Growers Union of the Czech Rep. respectfully but emphatically urge the European Commission to reconsider its intention to adopt the draft Regulation at the end of January 2024. A continued postponement in the adoption and/or publication of the draft Regulation will provide the opportunity for additional hop stocks to be used, the beers to be sold and reduce the impact on the hops and brewing industries.

We appreciate your willingness to examine this request, considering the unnecessary food loss and economic impact of disposing of current stocks. We urge you to please strongly consider the economic impact your decision will have. We remain available should you wish to further discuss this subject.

Sincerely,

International Hop Growers' Convention
German Hop Industry Association
Hop Growers of America
The Brewers of Europe
Hop Growers Union of the Czech Rep.