

27 July 2022

Application of EU health and environmental standards to agricultural and agri-food products

Dear Sir or Madam:

The International Hop Growers Convention (IHGC) is the association of hop growing countries, hop marketers, hop processing companies, and research organizations of the world. For over two decades, the IHGC Committee on Regulatory Harmonization has been working to promote harmonization of trade standards, including pesticide Maximum Residue Levels (MRLs), between hop producing countries and their export customers.

The European Union and the United States, together, grow over 90% of the world's hops and provide high quality products for consumers worldwide. Each growing region has a unique environment that allows specific varieties to flourish. Distinctive regional characteristics and over 100 unique varieties produced worldwide allow international trade to occur based on consumer preferences, not by regulatory restrictions.

The US and EU hop industries have invested heavily in the improvement of production practices that are more sustainable. For example, hop producers invest in precision drip irrigation systems, dramatically reducing the amount of water lost to evapotranspiration by mapping out the terrain of hop yards according to soil type and slope in order to deliver the precise amount of water needed to maximize production. Producers implement best management practices to maximize the carbon sequestration potential of their operations. Leaf and bine biomass is mulched and returned to the fields as a valuable soil amendment. Producers plant an array of cover crops to maintain high levels of organic matter. Hop producers around the world are leaders in these systems and continue to explore ways to improve environmental stewardship and expand sustainability.

For these reasons, the application of EU health and environmental standards to imported hops, especially regarding pesticide MRLs, undermines the advancement of hop growing practices and ignores specific needs of hop growing regions around the world.

Plant protection products are an integral part of a hop grower's toolbox needed to deal with many of the challenges of producing hops, including climate change, increased pest pressure, and managing pesticide resistance in this long-season perennial crop. The judicious use of plant protection products when pest/disease thresholds and weather/plant growth conditions indicate impending biologic and economic damage ensures a high quality, efficient crop is produced with minimal impact on the environment. Wisely using these tools is sustainable because a high yield and quality means less resources are needed to produce the hops demanded by the world's brewing industry. This saves water, land, fuel, and other inputs needed to grow the crop the world enjoys.

The application of EU environmental standards to foreign growers violates the basic understanding of production processes and scientific integrity. The result of such effort may have contrary consequences to the EU's core sustainability and environmental objectives, where lower yields will result in less sustainable practices in order to comply with the imposed EU environmental standards.

In the last four years, the European Union has eliminated the approval of ten active substances that were available for use by EU and world hop growers. While some of these active substances were not widely used or there were available alternatives, some remain key to integrated pest management programs (IPM) that have been developed over years of intensive research.

Hop growers continue to be diligent in their search for reduced-risk pesticides and other tools to achieve more sustainable practices. Unfortunately, the time necessary to develop these tools and limited long-term efficacy are challenges that take time and much research to address, and growers need tools today to manage their crops effectively.

Pesticide MRLs are trade standards and should not be used as a blunt policy tool that will hurt farmers in both EU and non-EU markets who are facing unique pest pressures.

The International Hop Growers Convention is committed to growing a sustainable crop. Our growers in Europe and around the world are stewards of our land. They value the unique environment of each production region that provides the world with rich varieties, contributing to a dynamic industry committed to providing healthy and quality products to its consumers.

For this reason, the IHGC calls for EU environmental policies to be used judiciously when considering imported product and such policies not be imposed when pesticide import tolerances are sought by parties outside the EU.

Moreover, the IHGC calls for transparency and adequate transition periods within Europe to allow European hop growers to adjust to pending pesticide policy changes, while also allowing for emergency uses as needed when no available alternatives are available.

The world's hop industry will continue expand its efforts in producing a sustainable crop as the EU considers these requests.

Please do not hesitate to contact us if you have any questions.

Yours sincerely,

Leslie Roy
President of the International Hop Growers Convention