

TEA & HERBAL INFUSIONS EUROPE

Formerly: European Tea Committee (ETC) and European Herbal Infusions Association (EHIA)



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Political Statement on the Sustainable Use Regulation (SUR) for Plant Protection Products

The European tea and herbal infusions sector welcomes the objective of the Farm to Fork strategy to make the European food system fair, healthy and environmentally friendly. Tea, herbal and fruit infusions will continue to be an integral component of a sustainable food system.

Food business operators rely on reliable harvest yields for tea and for the crops that are used for herbal and fruit infusions. Stable yields are indispensable if industry is to ensure that consumers are provided with products of a consistent high quality.

Appropriate rules for the application of plant protection products that are to be developed in context of the Sustainable Use Regulation are the precondition for stable harvest yields.

Security of supply at reasonable prices is key. A disproportionate limitation of crop protection will unduly limit the sourcing of compliant raw materials and will have a considerable impact on costs for primary production, industry and consumers.

The objective of the Farm to Fork strategy is to reduce the overall use and risk of chemical plant protection products by 50% by 2030. This objective must not be erroneously interpreted as a way of lowering maximum residue levels for plant protection products to the same extent.

What is at stake?

As part of its Farm to Fork strategy, the European Commission has announced two pesticide reduction targets to be attained by 2030. The objectives are to reduce the use and risk of chemical pesticides and to cut by half the use of more hazardous pesticides in the EU.

The central instrument to achieve these reduction targets is the revision of the Sustainable Use Directive (SUD) for plant protection products 2009/128/EC and the transposition of that directive into an EU Sustainable Use Regulation (SUR) for plant protection products.

The current SUR draft foresees legally binding reduction targets for pesticide application at EU level, with Member States being able to determine national reduction targets within defined parameters. The proposal also introduces a new concept of “sensitive areas”, where all use of plant protection products is prohibited.

Our view: SUR impact on tea

Tea is derived solely and exclusively from the shoots of varieties of the species *Camellia sinensis* (L) O. Kuntze and a commodity that is not commercially grown in the EU. Tea is mainly imported from subtropical countries, with China, India, Sri Lanka and Kenya being the most important tea growing countries. These countries establish rules for a safe application of plant protection products at national level.

The local authorisation of plant protection products ensures that effective crop protection is possible where growth conditions and pest pressure pose challenges that are different from those in the EU. The quality of tea raw material is predominantly influenced by the local conditions in the countries of cultivation.



The pesticide reduction concept of the Farm to Fork strategy will likely lead to a decrease in the number of authorised plant protection products due to a generally lower demand in the EU. Eventually, this will also impact EU maximum residue levels.

This trend is a risk for the tea sector which depends on a functioning global trade. The EU legal framework might no longer align with the needs of international trade because the requirements for plant protection of the EU trading partners will be different from the SUR strategy

In addition, several substances are regulated as plant protection products but the “residues” are not present due to an active use of these substances. They stem from multiple sources, such as a ubiquitous occurrence in the environment or atmosphere, processing conditions, cross contamination or natural occurrence in weeds that are co-harvested during picking. Thus, they are not real residues and the reduction of the active use of plant protection products will have no impact on these levels. Therefore, an automatic decrease of maximum residue levels is not possible in such cases.

THIE calls on the EU legislator and national enforcement authorities to better address these scenarios and to distinguish residues from active application of pesticides from those that occur via contamination. The effort to reduce pesticide application in agriculture shall not result in a more stringent evaluation of contamination scenarios where the influence of food business operators to achieve reductions is limited.

Our view: SUR impact on herbal and fruit infusions

Raw materials for herbal and fruit infusions are minor speciality crops that are also partly cultivated in the EU. For these crops the plant protection tool box is in many cases very limited because the crop-specific authorisation process is unprofitable for agrichemical businesses.

The implementation of the envisaged pesticide reduction framework and a corresponding further decrease of authorised substances will impact the economic cultivation of these speciality crops that make an important contribution to biodiversity. To ensure that raw materials for herbal and fruit infusions continue to be cultivated in the EU, adequate plant protection solutions are needed. Hardly any authorisations for the active use of plant protection products are in place for plants used as herbal and fruit infusions raw materials. The according maximum residue levels are significantly lower than those for major crops like wheat or maize. An automatic reduction of these levels its by 50% would make cultivation of herbal and fruit infusions raw materials in the EU even less possible.

A decrease in pesticide application will have the consequence that more agricultural land is needed for the cultivation of the major crops. As the available agricultural land is limited, there is a risk that an increase of the cultivation area for major crops will be to the detriment of minor crops like herbal and fruit infusions raw materials.

Furthermore, any limitation of the available plant protection tool box for weed management in herb cultivation will enhance weed infestation and potentially counteract food safety considerations. An accidental co-harvesting of weeds can impact food safety when weeds naturally contain critical components like pyrrolizidine alkaloids for which food safety limits apply.

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The economic importance of the Tea & Herbal Infusions sector

Over the past centuries tea and herbal infusions have been among the most popular beverages in the world, with tea being the world's most widely consumed beverage after water.

Europe is an important consumer market for tea, and the tea bush is grown in over 80 countries around the world. Tea production is a main source of income and export revenues for some of the poorest countries. According to the United Nations, tea production and processing represent a source of livelihood for millions of families, including those some of the poorest living in least developed countries. The UN also state, tea export earnings help to finance food import bills, supporting the economies of major tea-producing countries.

Europe is the world's Nr. 1 market for herbal and fruit infusions. The sector is dominated by small and medium sized companies, which drive job creation in Europe. The cultivation and wildcrafting of small-scale speciality crops promotes biodiversity and provides a large number of small-scale growers and wild collectors with additional income possibilities. By securing and promoting small-scale farming and wild gathering, the supply of herbal infusions positively affects the livelihoods of thousands of suppliers around the globe.

The market value for tea and herbal and fruit infusions in Europe is about 5 bio. EUR and thousands of jobs are either connected by the tea and herbal and fruit infusions industry directly or via affiliated services such as laboratories, packaging, logistic and transport. Therefore, tea and herbal and fruit infusions make a significant contribution to the economy of Europe.

About THIE

THIE is the European Association representing the interests of producers, traders and packers of tea and herbal and fruit infusions; as well as extracts thereof.

- Tea is derived solely and exclusively from the shoots of varieties of the species *Camellia sinensis* (L.) O. Kuntze and produced by acceptable manufacturing processes. Tea is intended for brewing using freshly boiling water for consumption as a beverage. Tea is an agricultural product that is grown, harvested and primary-processed at origin. Although black and green tea are the most commonly known, other types of tea can be produced as a result of different processing methods.
- Herbal and fruit infusions (HFI) materials are plants or parts of plants that do not originate from the tea plant (*Camellia sinensis* (L.) O. Kuntze) and are intended for food use by brewing with freshly boiling water. They also include blends that may contain tea as a minor component.

Information on the approximately 300 plants (and parts of plants) commonly used in herbal and fruit infusions can be found in the THIE Inventory list of herbals considered as food. Raw materials used for the production of herbal and fruit infusions are agricultural products which are sourced globally and are grown in developed and developing countries. They are cultivated by small growers or even wild gathered.