

TEA & HERBAL INFUSIONS EUROPE

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



Status: November 2022

Political Statement regarding pesticides legislation

THIE is the European Association representing the interests of producers, traders and packers of tea and herbal and fruit infusions.

The tea and herbal & fruit infusions industry relies on clear, predictable and manageable rules for tolerated maximum residue levels from the application of pesticides. Changes of the legal requirements must be implemented with adequate transitional periods so that industry and farmers can adapt to the new requirements. Stakeholders must be heard during the comitology procedure so that the impact of changes can be assessed and commented on.

What is at stake?

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

To reach these targets, the European Commission proposes changes of the legislative framework for plant protection products. This includes a revision of the sustainable use of pesticides directive, better integration of pest management and promotion of safer alternatives.

The announced policy objectives will indirectly impact the permitted maximum residue levels for pesticides.

Our view

Tea as well as herbal and fruit infusions must comply with all relevant aspects of food legislation in terms of composition, manufacture and control. To keep food safe, the European Union has established MRLs for more than 1300 pesticides, with a default 'trace-level' of 0.01mg/kg applied to nearly 690 of them.

Producers of tea and herbal & fruit infusions have implemented rigorous quality assurance systems to verify compliance with the legal requirements. All raw materials undergo a series of quality control measures prior to being marketed. Companies' own checks, official controls by authorities and testing by consumer organizations continuously show a high level of compliance with the requirements.

Legislative changes with existing MRL are a challenge for food business operators. Tea and herbal and fruit infusions have a long shelf life with a best before date of usually two years. Also, the time span between cultivation, purchase and use of raw materials in the production process can take several months.

Compared to this reality, MRL changes come into force too quickly and usually take effect shortly after they were adopted. Raw materials that have already been sourced might then no longer comply with the legal requirements and must be destroyed. This causes economic damage to food businesses and promotes food waste.

Changes of existing MRL and import tolerances are also a challenge for the entire supply chain and especially for the farmers that grow the raw materials. Where specific substances may no longer be used,



sufficient time is needed to evaluate viable alternatives to ensure an adequate crop protection and the definition of good agricultural practices that govern the application of alternative substances.

Changes in the current status quo may also have interaction with other food safety objectives. For example, the implementation of effective weed management is a prerequisite that the existing thresholds for pyrrolizidine alkaloids are met.

In view of these concerns, improved transparency must be established in the comitology procedure where MRL changes are decided. The meeting documents of the committee procedure must be published in a timelier manner. Stakeholders must be granted an adequate period of time to comment on intended MRL changes. The competent committee must outline the motivation and the reasoning for an MRL change.

The approval and change of MRL must take food safety considerations into account. Where further reductions of residues are in the foreground beyond food safety requirements, the supply situation must be adequately taken into account. Sufficient flexibility is needed for companies to be able to source compliant raw materials.

In some cases, residues cannot be explained by active use, but result from ubiquitous environmental pollution or cross contamination. These scenarios must be better addressed in the risk assessment and risk management procedure in order to ensure that compliant raw materials can be sourced.



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 promote 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.