



Frequently Asked Questions | GREENPEACE STUDY OF INDIAN TEA BRANDS

1. What is the issue all about?

Recently Greenpeace, an international organisation, sampled and tested a variety of Indian tea products to evaluate the level of residues of Plant Protection Formulations in teas.

2. So is it true? Are there residues of PPFs in Indian tea?

We care deeply about the quality of the tea grown in the country from the standpoint of safe domestic consumption, trade and export, and sustainable production. Plant Protection Formulations form a necessary part of ensuring a viable tea industry, like for any other agricultural crop. This study confirms that these brands comply with all the legal norms and are therefore safe to drink.

3. I have been drinking tea for many years and I am concerned with the latest media reports. Is it safe to drink?

Indian tea that is grown as per the guidelines issued by the government is safe to consume. The use of Plant Protection Formulations in the tea growing process is stringently regulated in India.

The tea plantations in India operate under several statutes and laws passed by the Government of India – notably the Food Safety & Standards Act 2006 (FSSA), which is a comprehensive legislation regulating the food industry in India.

The Central Insecticide Board & Registration Committee (CIBRC) has also identified 37 Plant Protection Formulations permitted for use in tea plantations. The Food Safety & Standards Authority of India (FSSAI) is engaged in defining Maximum Residue Levels (MRLs) for these products. The lists are regularly reviewed to incorporate latest science and to ensure that the least hazardous materials are used.

Tea Board of India has been working closely with the tea industry to deliver even higher standards and are engaged in several joint initiatives to continuously augment the standards regulating Indian teas.

4. How do Indian standards for tea match up to international standards?

The formulation of Indian standards is deeply influenced by technological developments in standards across the globe. We are consistently striving to develop standards and practices that will be used as industry benchmarks across the globe. The incorporation of standards maintained by international regulatory bodies, like the World Health Organisation and the Rotterdam and Stockholm Conventions, into the Plant Protection Code released earlier this year evidences this commitment.

The standards in India are some of the most stringent in the world. It is not appropriate to compare standards across regions, as the basis for setting MRLs is complex and involves extent of use, safety data, and consumption habits. Consumer safety is always at the top of consideration, and the MRLs are set at several times below safety limits.



However, it is important to recognise the Indian context when it comes to the requirements of farmers. We had thus developed the *trustea* programme to tailor global sustainability principles to Indian conditions. The *trustea* programme has been developed in partnership with international certification bodies, like the Rainforest Alliance, and incorporates elements from these programmes, such as management system, soil conservation, water management, fertiliser, PPFs, occupational health & safety, biodiversity, working conditions and labour rights, and waste management.

5. How safe is Indian tea for international consumers?

Indian tea is subject to some of the most stringent standards globally. All export tea will be subject to the requirements of those markets to which it is exported. Indian tea that is grown as per the guidelines issued by the government is safe to consume.

6. What measures do you currently have in place for safe teas?

The Central Insecticide Board & Registration Committee has identified 37 PPFs that are permissible for use in Indian tea growth. This list had been determined through extensive ongoing scientific study by the UPASI and Tea Research Association, each of which also lists recommended Plant Protection Formulations (PPF) for use on their websites. The Plant Protection Code lays out a list of products permissible for use, as well as the integrated management norms which allow for Good Agricultural Practice (GAP) and minimal use.

We have initiated several measures to regulate PPF residue in Indian teas through the establishment of Maximum Residue Limits (MRLs) for Plant Protection Formulations. The MRLs are set by a process of inter-governmental scientific consultation and exposure permitted PPF through the total local diet. Their composition considers local agricultural and ecological factors, as well as consumption behaviour.

The Food Safety and Standards Authority of India (FSSAI) has prescribed MRLs for 7 Plant Protection Formulation (PPF). Tea Research Institutes have recommended limits for 17 more PPFs which are awaiting notification by FSSAI. The FSSAI technical subcommittee is reviewing these recommendations and will adopt them in a notification following approval.

Additionally, the tea research institutes have been advised to monitor the PPFs use in tea plantations and generate residue and bio-efficacy data that has been submitted to both national and international regulatory bodies, such as Codex, JMPR, FAO IGG, on a continuous basis.

The Tea Board also periodically organises several awareness workshops in collaboration with the tea research institutes to disseminate scientific information about the safe use of PPFs. The Tea Board also circulates guidelines on a regular basis.

The safety of Indian consumers is paramount, and as such continuous review of our safety measures and standards is ongoing.



7. DDT is banned for use in Agriculture. Why is it found in tea?

DDT is banned for use in Agriculture since 1989. DDT is also not among the CIB & RC approved list of PPFs for use in Tea. Tea Plantations across India have long stopped use of DDT as a crop protection formulation.

Traces of DDT are likely to have been found owing to the extensive length of time that DDT takes to degrade in the soil, therefore lasting longer in the environment to which it is introduced. Also DDT is still widely in use by public health bodies as a measure of control for vector borne diseases such as malaria which may lead to some degree of runoff into adjoining areas.

It is relevant to point out that because of its long persistence mere detection of traces of DDT cannot be construed as improper direct use in tea plants and does not breach FFSAI rules. Given this position regulatory jurisdictions such as EU - following stringent norms – do have MRL for DDT (at 0.2 mg/kg) owing to its persistence.

8. Isn't the 'cocktail of PPFs' found in Indian teas harmful?

There can be presence of more than one PPF due to application of more than one applied to multiplicity of pest infestation or different teas are sourced for blending which could have been subjected to different spraying regimes.

To imply, by the sensational use of wording, that a mix of PPFs implies that there is a synergetic effect of the residues of multiple PPFs. This is contrary to the established science. The level at which a PPF could be harmful is determined on a specific basis with respect to each PPF and it is important to understand that as long as each residue level is within limits on a consistent basis, the product is safe for consumers. Extensive scientific evaluations about the bio-efficacy and safety of the end crop have informed the guidelines and strict regulations for use for each of the prescribed PPFs that have been developed by the Indian government. These guidelines and regulations have been formulated to safeguard consumers. Indian tea that is grown as per these guidelines is safe to consume.

At the same time the internally accepted norms like ADI (Acceptable Daily Intake) needs to be considered. For all instances of PPF residue traces, these are well below ADI (80 to 200 times below ADI). In sensationalising their study, they are misleading and causing undue concerns to the consumers.

9. Why has monocrotophos been found when it is not supposed to be used in tea?

Monocrotophos is amongst the 20 most commonly used PPFs in Indian agriculture, and is permitted for use in combatting sucking insects that affect cotton, paddy, maize, various types of grams, peas, sugarcanes, cater, mustard, citrus, mango, coconut, coffee, and cardamom crops. Its popularity amongst agricultural producers and deep immersion into the Indian agricultural industry might very account for its presence in Indian teas.

The Food Safety and Standards Authority of India (FSSAI) has set maximum residue levels (MRLs) of approved PPFs for different crops including tea in order to protect consumers. Whilst Monocrotophos does not have an MRL in India, the amounts found are significantly below the levels allowed in Japan.



The industry has developed the Plant Protection Code to encourage more effective use of PPFs. This code does not advise the use of Monocrotophos and suggests suitable alternatives.

It is to be noted that even after usage of a PPF is stopped, it is possible to detect minor residues for some time thereafter as they may persist in the environment. The presence of residues is not to be equated with actual usage.

10. What are your current policies on the matter of better more sustainable agricultural practices?

The Tea Board places utmost significance on the industry's journey towards sustainable agricultural practices. The Tea Board has already initiated several efforts in this regard, working with tea research institutes, private industry, and international certification bodies to develop programmes that are founded on the sustainable use of Plant Protection Formulations in the Indian tea growth, harvesting, and packaging processes.

The trustea sustainability programme that we introduced, with industry, in June 2013 is a multi-stakeholder initiative to establish sustainable practices in, and to strengthen the ecosystem for, tea cultivation in India based on ground realities with globally-accepted sustainability principles. The trustea programme incorporates elements of management systems and continuous improvement for tea-producing farms and plantations, product traceability, soil conservation and management, water management, fertilisers, crop protection products, food safety, worker welfare and labour conditions, biodiversity and environment management, and waste and pollution management. We're also developing a strategy for engaging smallholders to ensure long term success of trustea.

In the year since its launch, the trustea Sustainability Programme has initiated gap assessments and verification audits on small, medium and large estates. The programme is already working with over 60 small & large tea producers towards trustea verification. trustea has already verified 4 estates – 2 in Assam & 2 in South India – with an annual capacity of approximately 4.3 million kilograms. In the next three years, the programme envisions certifying 500 million kilograms of tea as sustainably grown while verifying over 600 factories, covering 500,000 workers and 40,000 small holders, making 300,000 hectares sustainable, and placing 1200 trustea trainers on the ground.

The Tea Board introduced the Plant Protection Code earlier this year to bring in a regime of sustainable plant protection practices. The code is a best practice guide to tea production. Its objective is to ensure the sustainability of tea production while continuing to improve the quality of tea for consumers. Along with a list of, "do's and don'ts," in tea pest management, the Code also outlines: guidelines for safe disposal of PPF containers; transportation, storage and application of PPFs; safe intervals for PPF use during the tea cultivation and harvest cycle; water quality, worker safety and equipment maintenance for PPF spraying; and, end product testing

We are also exercising efforts to harmonise Indian sustainability and production standards with international standards. These initiatives are part of an ongoing effort by the Tea Board and the industry to make the tea industry more sustainable.



11. What is the Tea Board's stance on organic farming?

One of the key objectives of Tea Board is to identify and implement best practices in the Indian tea industry to bring the best quality and ecologically sustainable tea to consumers. The Tea Board is working with the tea industry in promoting R&D and capacity building towards making organic farming a sustainable agricultural practice in tea and will actively support all initiatives in this direction.

That said, it is extremely important to note that given the monoculture nature of the crop, tea is extremely susceptible to pests and diseases. As such, PPFs are necessary to an extent in ensuring the viability of tea farming and the livelihoods of those who depend on it. It should be noted that PPFs are not an inexpensive agricultural input and farmers would not choose to use if they were not required. An integrated pest management effort is necessary and will be effective only with the combined and balanced use of solutions from across the organic and inorganic spectrum.

However, we are committed to only the most minimal and essential use of PPFs. We are constantly reviewing synthetic solutions utilised in the tea industry, and are developing guidelines and prescriptions to regulate their use.

We have also invited Greenpeace to demonstrate where there can be effective use of non-synthetic PPFs. Tea Board of India is open to collaborating with all stakeholders to help make tea production in India more sustainable in the long run. It was in this vein that Tea Board organized a seminar for Greenpeace to interact with the small tea growers in the tea sector on 7th June, 2014.

12. Are there different standards for home and abroad?

Several countries and regions maintain unique standards. The European Union, China, Japan and USA maintain their own standards. The Indian standards are some of the most stringent globally.

13. Why should the public continue to trust Indian-grown tea?

India has some of the most stringent regulations in the world to ensure the safety and protection of consumers. Teas complying with these standards are safe to consume.

Tea Board of India has been working closely with the tea industry to deliver even higher standards and is engaged in several joint initiatives to continuously augment the standards regulating Indian teas. This is an ongoing commitment of all concerned and we welcome the contributions of all stakeholders in achieving this goal.