



***Webinar on “Tea Export to the EU Market and the EUCS3D”  
under the study “Understanding the Impact of the EU Sustainability Standards on Indian Agri-  
Products Exports”***

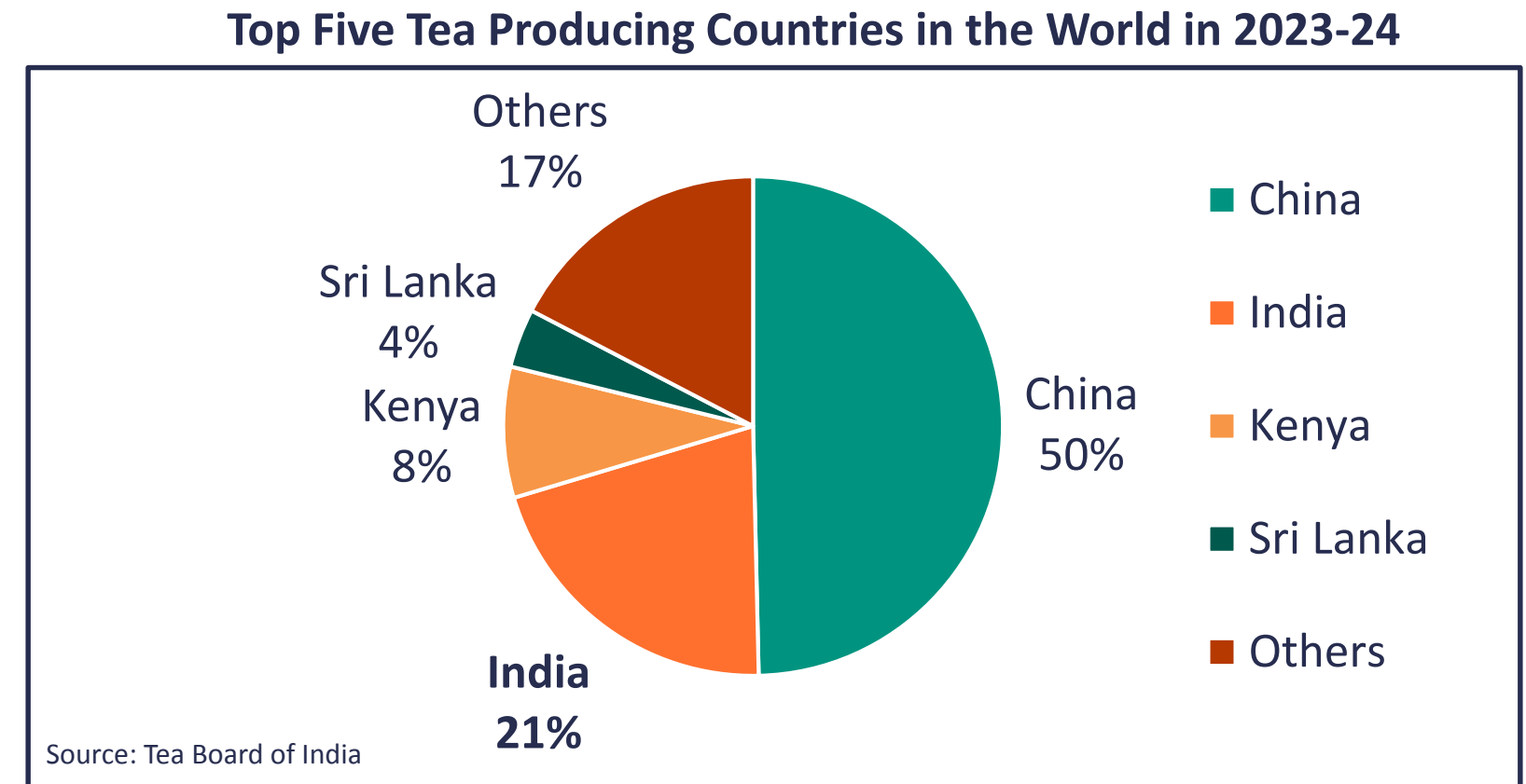


***By:  
Dr. Arpita Mukherjee  
Ms. Latika Khatwani  
Ms. Trishali Khanna***

***On June 23, 2025  
New Delhi***

# India: A Large Tea Producer and Exporter

- Globally, over 6.7 million metric tonnes of tea was produced in 2022, with Asia accounting for nearly 75 per cent of the output.
- India is the second-largest tea producer in the world (after China, 49.64%), contributing 21% of global production.
- In 2023–24, India produced 1,382.03 million kg of tea, an increase of 14.35% from 2012.
- The Indian tea industry is a major source of employment, employing 1.16 million workers.
- India was the 3<sup>rd</sup> largest tea exporter in the world in 2024. Between FY 2010–11 and FY 2023–24, India’s Tea exports to the world increased, from USD 623.29 million to USD 826.07 million, with CAGR of 2.19%.



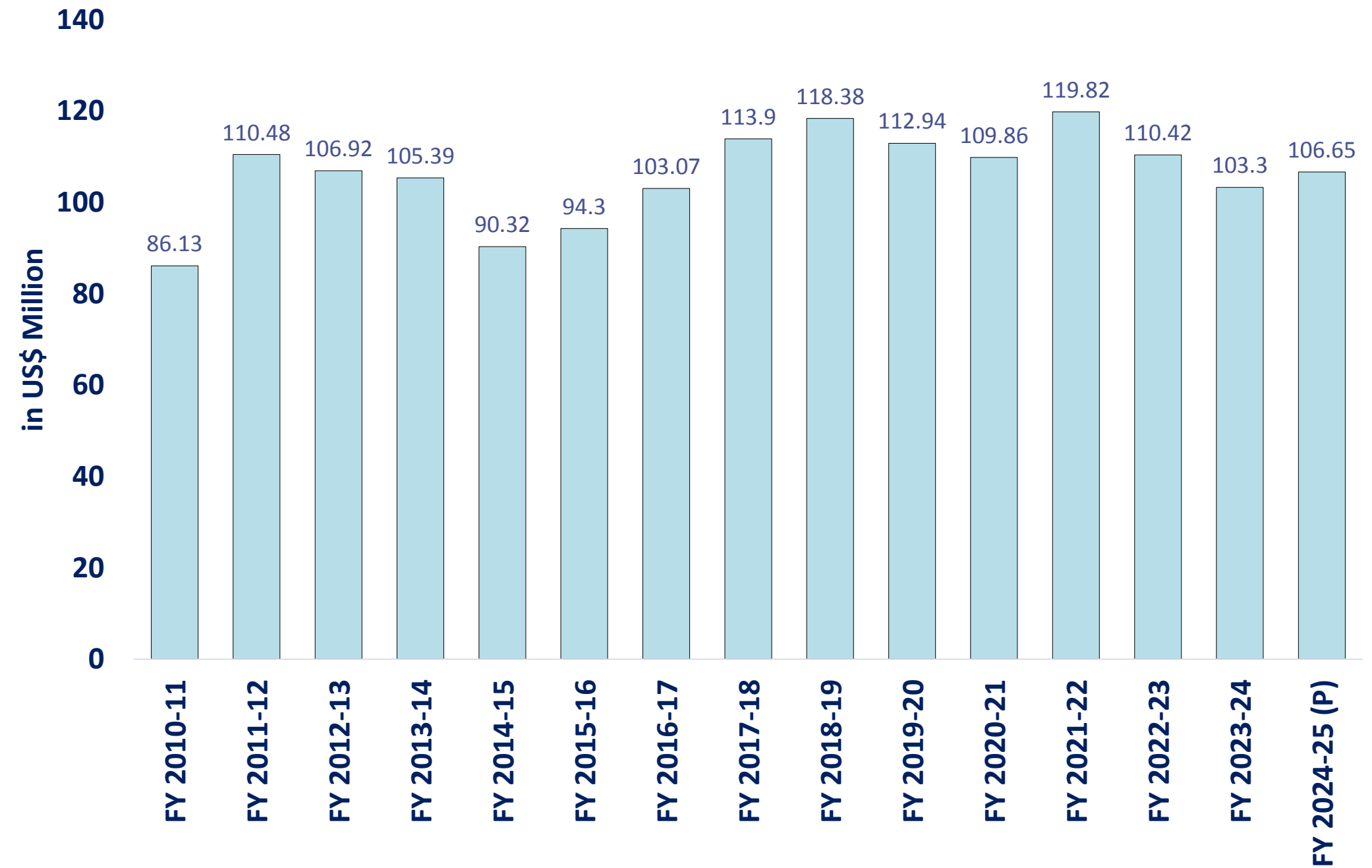
**Table 1: GI-tagged Indian Tea**

State	GI-Tagged Tea Variety	One District One Product	
		District	Tea Variety
West Bengal	Darjeeling Tea (Word and Logo)	Darjeeling	Darjeeling Tea
Himachal Pradesh	Kangra Tea	Kangra	Kangra Tea
Assam	Assam Orthodox	Udalguri	Orthodox Tea (black) and Green Tea
Tamil Nadu	Nilgiri Orthodox Tea	Nilgiris	Tea
Uttarakhand	Uttarakhand Berinag Tea	-	-
Arunachal Pradesh	Arunachal Pradesh Singpho Pahala (Singpho Tea)	-	-

# The European Union (EU): A Key Tea Export Market

- The EU is India's **second-largest tea export market**, importing Indian tea worth USD 103.30 million (contributing to 12.50% of India's total tea exports) in 2023–24.
- Exports of tea to the EU increased, from USD 86.13 million to USD 103.3 million, with a CAGR of 1.40%;
- In FY 2023–24, India's top tea export destinations other than the EU were the UAE (USD 131.19 million; 15.88%), Iraq (USD 88.54 million; 10.00%), the USA (USD 77.62 million; 9.40%), and Russia (USD 77.17 million; 9.34%).

Tea Exports from India to the EU



Note: (P) denotes provisional estimates.

Source: Ministry of Commerce & Industry, Government of India

# Rejection of Indian Tea Exports: The EU’s Rapid Alert System for Food and Feed (RASFF) Window

Table 2: Indian Tea Export Rejections as per the RASSF Window [2020 - 2025 (Jan-May)]

Rejection Criteria	Hazard	Maximum Residue Level (MRL) in the EU	Levels Detected In Indian Exports	Year	Notifying Country	Notification Classification	Risk Decision
<b>MOSH (Mixture of saturated hydrocarbons), MOAH (Mixture of aromatic hydrocarbons), Pyrrolizidine alkaloids and Atropin/Scopolamin in tea</b>	Mineral Oil Migration (MOSH, MOAH)	≤ 0.5 mg/kg – ppm (parts per million)	13 mg/kg – ppm	2024	Netherlands	Alert Notification	Serious
	Pyrrolizidine Alkaloids	≤ 200 µg/kg ppb (parts per billion)	-				
	Atropine	≤ 25 µg/kg – ppb	-				
<b>Chlorpyrifos in tea</b>	Chlorpyrifos	0.01 mg/kg - ppm	0.062 mg/kg - ppm	2024	Netherlands	Alert Notification	Serious
<b>Chlorpyrifos and Chlorpyrifos-methyl in Rooibos pineapple tea</b>	Chlorpyrifos	0.01 mg/kg – ppm	0.058 mg/kg – ppm	2024	Netherlands	Alert Notification	Serious
	Chlorpyrifos-Methyl	0.01 mg/kg – ppm	0.017 mg/kg – ppm				
<b>Pyrrolizidine alkaloids in black tea from India via Canada</b>	Pyrrolizidine Alkaloids	150 µg/kg – ppb	347 µg/kg – ppb	2024	Belgium	Information Notification for Attention	Potentially Serious
<b>Fenobucarb in black leaf tea</b>	Fenobucarb	0.01 mg/kg – ppm	0.064 ± 0.0321 mg/kg – ppm	2024	Poland	Information Notification for Attention	Potentially Serious
<b>Pesticide residue - tolfenpyrad in black tea</b>	Tolfenpyrad	0.01 mg/kg – ppm	0.063 ± 0.032 mg/kg – ppm	2023	Poland	Border Rejection Notification	Potentially Serious
<b>2-chloroethanol in organic tea</b>	Ethylene Oxide	0.01 mg/kg – ppm	0.26 mg/kg – ppm	2022	Netherlands	Border Rejection Notification	Serious

Source: RASSF Window

- Out of the 7 notifications, 4 were classified as “serious” and 3 were “potentially serious”.
- Chlorpyrifos, a pesticide, that is the most frequently cited, is banned in the EU and subject to a default Maximum Residue Limit (MRL) of 0.01 mg/kg. In India, the Food Safety and Standards Authority of India (FSSAI) permits its use in tea with a MRL of 2 mg/kg (**200 times higher than EU’s limit**).
- Chlorpyrifos-methyl, an insecticide, was detected at 0.017 mg/kg, **exceeding the MRL of 0.01 mg/kg set by both India and the EU.**

# Meeting the Labour and Environmental Standards: The EU Corporate Sustainability Due Diligence Directive (2024/1760) – EUCS3D

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- On June 13, 2024, the European Commission came up with the Directive (2024/1760) on corporate sustainability due diligence, which focuses on **labour and environment standards, across the product supply chain**. The Directive requires companies to take appropriate steps to set up and carry out due diligence measures, with respect to their operations, those of their subsidiaries, as well as those of their direct and indirect business partners throughout their chains of activities.

## Objective of the Study

To understand the impact of the EU sustainability standards on Indian agri-exports, and to make recommendations on how India can secure its export position and become a larger player in the EU companies value chain.

## Objective of the Webinar

To understand the potential of the EU market, the export requirements, issues that exporters are facing and support that they need in terms of financial support for investment, capacity building, technology, support in identifying and mitigating labour and environment standards related risks.

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**Over to Ms. R V Anuradha & Ms. Meghna Sengupta, Clarus Law Associates  
Presentation on Broad Framework of EU Due Diligence Directive**

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**Over to Mr. Vir Mehta, Manager, Decent Work, Solidaridad Network  
Presentation on Identifying and Mitigating the Risks**

# Key Questions for Discussions

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## 1. Information Gaps

- a) What process do you follow while exporting to the EU? Do your buyers/importers regularly update on the EU Directives and regulations including updates on banned chemicals, certifications required, etc.? If not, from where do you receive this information?
- b) Are you aware of EUCS3D and its requirements? Have EU buyers discussed about labour and environmental standards with you?
- c) Are there any legal or regulatory gaps that may make it difficult to comply with the requirements of EUCS3D, for farmer/manufacturer/exporters/other supply chain partners?
- d) Despite of having food safety regulations, why are our exports getting rejected?
- e) Are you aware of the hazardous chemicals that are banned in the EU and the limits set in India? As mentioned, Chlorpyrifos-methyl was detected at 0.017 mg/kg, exceeding the MRL of 0.01 mg/kg set by both India and the EU.

## 2. Use of Technology in Existing Supply Chain to Monitor the Quality, Process, etc

- a) Do you have the technology to monitor traceability to the farm level? If yes, what are the technology that you are using? What are associated costs and challenges associated with setting up and managing these systems?
- b) Are you doing geo-tagging of your land?

## 3. Adhering to the EU Member States Requirements

- a) Are you exporting tea to Germany? If yes, what documentation and records are you maintaining to comply with Germany's Supply Chain Due Diligence Act (2021)?
- b) Are there any challenges faced during the audit process? If an auditor is engaged from the EU member states, what are the cost components?
- c) Have EU companies so far asked any due diligence certificates from you? What were the costs associated with it?

# Key Questions for Discussions

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## 4. Environmental Related:

- a) What are the top 5 environmental risks that you are facing (such as, greenhouse gas emissions, deforestation, quality of chemicals and pesticides, etc.)?
- b) What measures have you taken to mitigate these risks?
- c) Do you have the systems in place to monitor and report greenhouse gas emissions across your operations? Have you undertaken any measures to reduce these emissions (such as investments in cleaner technologies, renewable energy, sustainable packaging, etc.)?
- d) Have you been part of any environmental audits or certifications? If so, were you satisfied with the process?
- e) Did obtaining an environmental certification help you get a better price or improve market access for your products in the EU?
- f) Are your EU buyers supporting you in meeting these requirements through investment, knowledge sharing, training, or capacity building?
- g) Have you estimated the cost or investment needed to meet the environmental standards under the EUCS3D? (This question is specifically directed to the Tea Board and Tea Associations).

## 5. Labour Related:

- a) Do you follow the ILO decent work principles such as minimum wage, no, child labour, regulated working hours, etc? Do you maintain proper records to support this during audits or reviews?
- b) What kind of benefits do you give to your agriculture labourers in tea gardens and workers in your manufacturing units?
- c) Do your EU clients ask for any documentation or records to show compliance with decent work standards?
- d) Is there any trade union in your organisation?
- e) Do you have any policies for ensuring gender balance in your workforce? Did you create any facilities or infrastructure to support women employees and workers?

## 6. Investment Related:

- a) Despite Foreign Direct Investment (FDI) being permitted under the automatic route in plantations like tea and coffee, why is India not attracting higher FDI inflows in the sector?
- b) Are you currently receiving any FDI? In your view, do we need more FDI in the Indian tea sector? If yes, What can be done to attract more of it?

# What Support Do You Need?

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- a) What support do you need from the Indian Government in terms of (a) investment required, (b) training, and (c) capacity building to effectively comply with the EU requirements?
- b) What kind of support do you need from industry bodies/export promotion bodies to help you and your supply chain partners in increasing your exports to the EU and comply with the EU Directives.

**THANK YOU**

For any queries, please contact:

Dr. Arpita Mukherjee: [arpita@icrier.res.in](mailto:arpita@icrier.res.in)

Ms. Latika Khatwani: [lkhatwani@icrier.res.in](mailto:lkhatwani@icrier.res.in)

Ms. Trishali Khanna: [tkhanna@icrier.res.in](mailto:tkhanna@icrier.res.in)