

# TEA & HERBAL INFUSIONS EUROPE

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



Hamburg, 17th February, 2026 – [REDACTED]

European Commission  
DG Health and Food Safety  
Pesticides and biocides (SANTE.E.4)  
[REDACTED]  
Brussels  
Belgium

via email to: [REDACTED]

**SCoPAFF Meeting 5-6/2/2026**  
**PLAN/2025/1425: MRL for fenpropathrin in tea**

Dear [REDACTED]

With great concern we have seen the EFSA opinion *Targeted review of maximum residue levels (MRLs) for fenpropathrin* (<https://doi.org/10.2903/j.efsa.2023.8057>) which proposes a decrease of the MRL for fenpropathrin in tea (*Camellia sinensis*) from 2 mg/kg to 0.05\* mg/kg. EFSA concluded that the risk assessment could not be finalised due to a lack of robust toxicological reference values and a lack of supporting data.

Respective discussions of a legal proposal are ongoing in the SCoPAFF since 11/2024 according to the agendas and the summary reports of the meetings and were last discussed in SC PAFF 2/2026 on basis of PLAN/2025/1425 V1).

**We request the establishment of an MRL for fenpropathrin in tea at a level of at least 0.2 mg/kg, in order to enable tea growers to protect their tea bushes against the tea mosquito bug and to prevent serious disruptions to the EU tea supply chain.**

## **Global market conditions**

Due to the Codex MRL of 3 mg/kg for fenpropathrin in tea (*Camellia sinensis*) important tea growing countries established similar MRLs, esp. India (2 mg/kg), China (5 mg/kg). Major consuming countries like UK, USA, Canada and Australia apply a MRL of 2 mg/kg which is in line with the current EU MRL.



This situation clearly shows that the proposed decrease of the MRL in the EU would severely challenge the supply of tea to the EU. This applies to both, the consumer market for tea in the EU as well as the processing of tea for the export market.

### Residue situation

THIE monitoring data from 2022-2024 based on a LOQ of 0.01 mg/kg confirm this scenario:

THIE	2022-2024	2022-2024
<b>monitoring data</b>	<b>total</b>	<b>Assam (India) only</b>
Number of samples analysed	13833	2125
Number of positive samples	521	259
Percentage positive samples relating to samples analysed	3.8%	12.19%
Mean (relative to total samples) [mg/kg]	0.015	0.027
Number of samples >0.05* mg/kg	192	119
Percentage of samples >0.05* mg/kg	1.39%	5.6%
Number of samples >2 mg/kg	2	1
Percentage of samples >2 mg/kg	0.01%	0.05%

Although the absolute figures seem to allow a decrease of the MRL for tea to 0.05 mg/kg at a first glance it has to be taken into consideration that an increasing number of insecticides can no longer be used in tea cultivation due to the EU pesticide policy. Fenpropathrin is currently actively used in China which is the most important green tea supplier and in India which is the most important black tea supplier to the EU. The share of China was nearly 18% and India's share 16% in 2024.

The Indian tea growing region Assam is a key supplier of black tea to the EU. The Indian share of black tea imports to the EU amounts to about 20% with tea from Assam accounting for the major part of it.

Teas are characterised by the specifics of the respective tea growing region and cannot just be replaced by teas of other origins.

### Availability of effective insecticides

There is a general tendency to cut down the availability of insecticides in tea cultivation due to the EU pesticide policy. In particular, the loss of the neonicotinoids clothianidin, thiamethoxam and thiacloprid has hit the Indian tea growers extremely hard as these active substances are nowadays the most effective ones to fight the tea mosquito bug.

There are hardly any substances left to effectively protect tea bushes against the tea mosquito bug in compliance with EU pesticide legislation. This is proven by the list of active substances recommended by the Indian Tea Board:



Insecticides recommended for management of tea mosquito bug:

Insecticides	Dilution	
	HV	LV
Deltamethrin 2.8 EC/11 EC	1: 2000	1: 1000
Bifenthrin 8% SC	1: 1600	1: 800
<del>Thiamethoxam 25 WG</del>	1: 4000	1: 2000
<del>Betacyfluthrin 8.49% w/w + Imidacloprid 19.81% w/w OD</del>	1:1333	1:667
<del>Thiamethoxam 2.6% + Cyhalothrin 9.5%</del>	1: 2666	1: 1333
Emamectin Benzoate 3% + <del>Thiamethoxam 12% WG</del>	1:2000	1:1000

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Quinalphos 25 EC	1: 400	1: 200
Fenpropathrin 30 EC	1: 1600	1:800
Neem Extract (azadirachtin 5% W/W)	1: 1500	1: 750
Clothianidin 50 WDG	1:4500	1:2250
Thiacloprid 21.7%	1:1000	1:500

Source: Plant Protection Code of Indian Tea Board 11/2025 (<https://www.teaboard.gov.in/TEABOARDPAGE/ODY=> )

Substances marked in red in the table are already regulated at LOQ level in the EU. For emamectin there is an EU MRL of 0.09 mg/kg but it is only effective in combination with thiamethoxam which cannot be used anymore for tea for the European market. In addition, EFSA proposed to decrease the MRL for bifenthrin in tea from 30 mg/kg to 0.05\* mg/kg (<https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2023.7864>). Thus, only deltamethrin (MRL 5 mg/kg) and fenpropathrin are currently available to fight the tea mosquito bug. This is already not enough to avoid resistances. If fenpropathrin is also banned there is only deltamethrin left.

Thus, fenpropathrin is further needed in tea cultivation to effectively protect tea bushes in certain regions. Based on the THIE monitoring data and the STMR given in the JMPR evaluation 2014 a decrease of the MRL for fenpropathrin in tea seems possible but a level of 0.2 mg/kg is needed.

Should you have any further questions, please do not hesitate to contact us.

Kind regards

Tea and Herbal Infusions Europe – THIE

