

## **It's not just a cup of Chai: Looking at the inhumane conditions of tea plantation workers in a Neo-liberal India**

---

### **INTRODUCTION**

It was a report published by Oxfam in 2019 revealing the depths of human suffering that workers on tea plantations must endure to bring the prized commodity to our market shelves (Banerji & Willoughby, 2019: 4). Tea has continued to be the second most consumed drink across the globe, behind water. In the year 2022 alone, global consumption of Tea stood at 6.7 billion kilograms, with estimates suggesting that consumption would reach 7.4 billion kilograms by the end of 2025 (Statista, 2023: 1). Tea industry has been at the centre of transformation as the countries like India, have continued to introduce measures signalling an economic liberalisation of an otherwise primarily controlled market, which for a long time was extensively state-centric. Neoliberalism has been hailed as our times' dominant and rather pervasive economic agenda. In the words of Venugopal, "It is seen as a rationality of class domination and exploitation, the manifestation of 'capital resurgent', an overarching dystopian zeitgeist of late-capitalist excesses, described as the most successful ideology in world history" (as quoted in Venugopal, 2014: 1). The structural break that came in with Neoliberalism would see countries like India trysting with it, whose origins are traced to 1991 under the former Congress leadership (Chandrasekhar, 2021: 1). In the words of Chandrasekhar, "Despite its adoption in the wake of a crisis, that shift was presented as a swift transition to superior policy regime wherein state intervention that distorts markets, suppresses private initiative, represses finance, and limits growth was to be abjured" (as quoted in Chandrasekhar, 2021: 1). The liberal policies allowed for an enhanced inflow of foreign capital, which has continued to define the economic landscape of India. With

liberalisation, there was a paradigm shift in the Indian tea industry, with changes in productivity and pricing based on international factors, as Tea became an important cash crop bringing in lucrative amounts of foreign exchanges (Dhekale et al., 2018: 27). The liberalisation measures have allowed leading names in the tea industry like Unilever, Van Rees, James Finlay, and Tata Tetley to decentralise their modes of sourcing Tea, as they continue to source products from private tea estates allowing them to wash their hands of the conditions that the workers on the tea plantations have been continued to be subjected to (Larsen, 2016: 2).

Women labourers in the tea plantations have consistently outnumbered the number of men owing to the low levels of mechanisation in the tea industry (Bhadra, 2004: 43). The subordination of women labourers, shaped by patriarchal oppression and gendered segregation, has continued to position women at the bottom of the plantation hierarchy, reimposing pre-existing gender archetypes (Laskar, 2020: 10). Despite echoes of a change in tea plantations with the coming of liberalisation, the plantations still seem to have transfixed themselves onto a past wherein the gendered division of labour continues to be typified by a pervasive relationship surrounding human exploitation centred on a complex system of hierarchy in power relations (Duara & Mallick, 2012: 177). The flourishing of the tea industry has been shaped by exploitative plantation practices with indentured labour working in conditions, which is scarcely better than slavery (Arora, 2022: 12). There has been a relentless squeeze by supermarkets and brands when it comes to generating greater profits in the tea markets (Banerji & Willoughby, 2019: 5). As the relentless push for profits continues, it has made the problems faced by the tea plantation workers even more acute, with many being forced to inhabit filthy conditions, with the workers being consistently alienated from the benefits of the commodity they have produced for generations (Banerji & Willoughby, 2019: 5). With workers being compelled to live in poverty-stricken conditions, inhabiting a

social life in shambles, wherein there has been a withdrawal of welfare measures that the tea plantation workers previously enjoyed (Raj, 2020: 84). In the words of Raj, “There was a puncturing of the isolated environment on the tea plantations owing to the precipitation of neoliberal reforms” (as quoted in Raj, 2020: 84). Entangled to the process of tea cultivation is the role of women, and the forging of their identity as a woman in the landscape of tea plantations. Looking at tea production in states like Assam in the Northeast of India, which in historical terms, has been one of the largest producers in the world, wherein companies own large tracts of land. However, with the neoliberal reforms in play, “there has been an upsurge in small tea growers and independent ‘brought-leaf factories’ (BLFs) that are changing the dynamics in the industrial landscape” (as quoted in Banerji & Willoughby, 2019: 9).

The pursuit of implementing neoliberal reforms to cope with the balance of payment crisis has created conditions wherein the marginality of the women labourers gets exploited in bringing the commodity to the market shelves (Das & Dhanaraju, 2019: 413). Kurian’s work though written in a Sri Lankan context, gives us an insight into the operation of the tea industry, with a specific focus on the women labourers on the tea plantations. In the words of Kurian, “The ‘wants’ of the female workers are suppressed by the ‘needs’ as perceived by the management, rather than the real wants of the woman herself. Issues of male dominance, less participation in trade union activities by women, and physical and sexual violence are some of the inherent factors that have continued to determine women’s conditions of employment and survival (as quoted in Das & Dhanaraju, 2019: 415). As there has been a further marginalisation of women on the tea plantations and a growing decentralisation in the plantation economy, large buyers like Tata and Unilever have been increasingly buying from BLFs. While the BLFs are subjected to the regulations of the Indian state, which include the Indian Factories Act, Minimum Wages Act, and Payment of Wages Act, while the companies

that source their Tea from these places are not subjected to any of the regulations allowing them to shoulder off responsibility.

The liberalisation measures of the 1990s saw the tea landscape of India and the globe being dominated by few companies. This consolidation of the tea industry at the top of the supply chain has allowed these companies to use the monopolistic market structure to their advantage by skimming off most of the value and profits generated in the supply chain.

Central to this cycle of generating earnings for the top players in the industry is the extensive labour that has been performed by the womenfolk on the tea plantations for generations. The employment of women in the tea plantations has been a vital part of the history of tea plantations; who had been sought after in a bid to ‘contain the male labour force’ and as a medium to ensure the ‘production of cheap labour’ (Global Network for the Right to Food and Nutrition, 2016: 18). The women tea plantation workers continue to be subjected to poor conditions. Despite hopes of better living conditions with the entry of big names into the tea industry, it has instead been a sorry story as they continue to occupy a position of marginality. The essay seeks to find an answer to how the liberalisation of the Indian economy, contrary to expectations, has not improved the conditions that the tea plantation workers inhabit, marginalising the women and dominant workforce even further on the tea plantations, despite hopes for a radical change.

The first section looks at the landscape of the tea industry and the global supply chain, which has traditionally remained an opaque lens. The second section elucidates the conditions of women labourers on the tea plantations and casts a contemporary lens while delving into the continued inhumane conditions they are forced to work under. Finally, the third section concludes the essay by reemphasising the research statement here and how the rise of an age of liberalisation has led to further marginalisation of plantation labourers, especially the women who form most of the workforce, warrants greater attention from different quarters.

## **CHANGING DYNAMICS IN THE TEA INDUSTRY AND THE LACK OF TRANSPARENCY IN THE GLOBAL SUPPLY CHAINS**

The age of globalisation has seen a massive spurt of retail and brand companies across the globe, which has also come with a deepening concern surrounding labour standards in global supply chains (LeBaron, 2018: 2). As per estimates, there are 13 million workers toiling on the tea plantations who have continued to suffer from endemic human rights abuses, while the tea companies that buy their products from the tea estates have evaded responsibility and continue to earn profits (Business & Human Rights Resource Centre, 2021: 2). Unlike other sectors in the economy which run on complicated supply chains, the tea industry comes with a certain degree of visibility, but leading brands and retailers have continued to shrug questions when it comes to revealing their sourcing processes (Business & Human Rights Resource Centre, 2021: 3). The words of LeBaron puts the situation succinctly, “The pretty pictures we see on shiny boxes of tea or adverts are incredibly different to reality – even on many ethically certified plantations” (as quoted in Huxtable, 2021: 1). Further, bringing LeBaron while elucidating the conditions of the workers on the plantations state, “Many tea workers lack basic necessities like water, toilets, housing, and sufficient food. Plantations can be very isolated, and while plantation owners should provide and maintain these services and goods, they often don’t. Tea workers are paid so little that they have no other way to secure these things themselves” (as quoted in Huxtable, 2021: 2). A two-year study titled ‘Global Business of Forced Labour’ investigated the business models centring around forced labour in tea and cocoa supply chains. The report pointed out the prevalence of endemicity in both industries when it comes to the exploitation of labour (Postles, 2018: 1).

The report brought light to how widespread labour abuses in the tea supply chains feeds the UK market wherein low prices and lack of regulations when it comes to sourcing has carved out high profits for retail and brand firms, but at the same time it has continued to marginalise

the workers on the plantations even more (Postles, 2018: 3). Adding to that, employers' profit from such practices as it allows them to reduce the cost of business and overheads by systematically underpaying the workers on the plantations (Postles, 2018: 3). One of the conclusions stated in the report points out; "In the tea industry little difference was found in labour standards, including wage levels, between certified and non-certified tea plantations, with certified plantations faring worse than non-certified plantations against some indicators of labour abuse and unfair treatment" (as quoted in Postles, 2018: 4). This is a blow to the dreams of liberalisation, which saw an enhanced inflow of foreign capital, as countries like India sought to accelerate growth while dealing with a balance of payment crisis (Chandrasekhar, 2021: 2). Amidst the changes in policy, it was already assumed that there would be improvements in the well-being of Indians who have been mired in poverty and has been socially depraved (Chandrasekhar, 2021: 3). However, contrary to the promises made by the government, the policy change has led to a small number of winners, but a majority of them have fallen at the other deep end of the economic spectrum (Das, 2015: 717). In the words of Das, "Neoliberalism has produced a massive amount of economic inequality, insecurity, unemployment and under-employment, casualisation, informalisation, greater labour exploitation, and lax or non-existent implementation of protective factory acts" (as quoted in Das, 2015: 718). The liberalisation brought with it reduced support for the plantation industry, and the most impacted by this were the tea estates, which had continued to rely on government subsidies for sustaining themselves and earning profits (Das, 2015: 718).

India is one of the most significant players when it comes to exporting Tea; the tea industry in India saw a boom post-independence during the first three decades, which can roughly be traced to between 1950 and 1980 (Raj, 2022: 1). However, there was a collapse of the tea prices in the early 1990s, catapulting the Indian tea industry into a significant crisis. In the

words of Raj, “the crisis was due to neoliberal structural transformations in the international tea trade” (as quoted in Raj, 2022: 1). This transition from a traditionally state-regulated economy to one of a free market was consistent with the larger changes which were taking place in the sphere of International Political economy. By the 1990s, few players continued to control the industry and play an interventionist role when it came to determining the price of Tea in the global market (Raj, 2022: 3). Coupled with the lack of regulations and an increased monopolisation by a few in the tea industry has led to a constant alienation of the plantation workers from the profits that are being made in the global market. The top four companies account for more than 60% of the total sales; include Twinning & Co., Bettys & Taylors, Tetley, and Unilever group (Business & Human Rights Resource Centre, 2021: 6). The industry, despite recent changes in mechanisation, has mainly remained depended on manual labour. In its current form, the industry is deeply embedded and rooted in centuries of colonial profiteering and violence, whose effects continue to be felt. The Global Business of Forced Labour report also states, “Tea companies not only outsource production, but they also outsource human rights due diligence, using certification bodies to monitor compliance with basic human rights on the plantations – even while certification bodies themselves insist that certification is not a substitute for human rights due diligence” (as quoted in Business & Human Rights Resource Centre, 2021: 6). Tea plucking is a backbreaking intensive job with workers being stretched to their absolute maximum physical limits. Despite the arduous work and the number of hours they put in trying to meet their daily quotas for plucking teas, they still earn meagre wages which at points are below subsistence levels (Huxtable, 2021: 3). In the words of LeBaron, “It’s not uncommon for workers to pick 80 kg of leaves a day – that’s the weight of 25,600 teabags –for them to make around 140 rupees, amounting to 1.50 pounds” (as quoted in Huxtable, 2021: 3). Trapped in the cycle of unfair conditions, they are mainly left at the mercy of tea plantation owners who continue to push them to inhabit

increasingly inhumane conditions. Despite independent certification provided by Fairtrade, Rainforest Alliance, Ethical Trade Partnership, and Trustea, the findings by LeBaron in the report ‘The Global Business of Forced Labour’ points out that “Overall, we found that certification had little to no impact on labour standards within the tea industry. Some of the worst cases of exploitation documented within our research occurred on ethically certified plantations” (as quoted in LeBaron, 2018: 3).

#### **ENDURING INHUMANE CONDITIONS ON THE TEA PLANTATIONS**

Tea companies have not only continued to outsource production but have also continued to outsource due diligence using independent certification bodies to hide the conditions that many of these plantation workers continue to work in (Business & Human Rights Resource Centre, 2021: 6). Even, while the certification bodies themselves have continued to insist that the certification issued by them shouldn’t be used as a measure of human rights diligence.

Wages in the tea sector have continued to remain below living wage levels and have not kept up with the rising inflation. In the state of Assam, the average wage for a tea plantation worker comes to be around just 20% of the living wage, which is required to meet basic needs (Business & Human Rights Resource Centre, 2021: 8). Gender discrimination when it comes to paying wages, with women workers being even further marginalised here with them constituting the majority of workforce performing the backbreaking task of plucking in the tea plantations. Adding to that, they are supposed to meet largely unrealistic daily targets for churning out greater profits for the tea estates and, in turn, for the companies who purchase Tea from them. The daily quotas render wages to be variable, which has a disproportionate impact on the women workers, leaving them increasingly insecure and vulnerable to adverse effects (Business & Human Rights Resource Centre, 2021: 9). Most workers working on the plantations are not even aware of how their wages are being calculated, and in most cases, they are not provided with paychecks. As one of the workers being interviewed for the Oxfam

report stated, “Because of illiteracy, the (pay)slips become insignificant for the workers. We nevertheless keep it for future purposes” (as quoted in Banerji & Willoughby, 2019: 17).

With a relentless squeeze for profits led by supermarket chains and brands to capture a more significant chunk of consumer market, it has made hardships for the workers on the tea plantations even more likely, with the women labourers facing a disproportionate burden (Banerji & Willoughby, 2019: 5). The Oxfam report points out, “The tea plantation system – reinforced by social norms – traps women in the lowest paid jobs with the fewest benefits and amenities, working long hours plucking tea, on top of the unpaid care work they do at home” (as quoted in Banerji & Willoughby, 2019: 15). Manual mode of labour continues to be the dominant form in most of the tea plantations, wherein plucking Tea, pruning, spraying tea bushes, and usage of outdated equipments continuing to be hazardous occupations for the workers on the plantations (Banerji & Willoughby, 2019: 21). Adding to the hazardous nature of the work and inadequate safety provisions, workers on the plantations are also consistently exposed to water-borne diseases like diarrhoea and typhoid. The Oxfam report brings forward some eye-opening revelations, “Over half of the women workers interviewed reported having suffered from dehydration and fever. Even more disturbingly, many of the workers who gave reported congenital disabilities and other illnesses they believed were caused by pesticides. Additional hazards of working among the tea bushes include spiders, scorpions, and snakes” (as quoted in Banerji & Willoughby, 2019: 21).

The women workers on the tea plantation are faced with a case of double marginalisation, wherein they are left isolated owing to their status as descendants of migrant labours and, secondly, as women in a traditionally patriarchal society. The Oxfam report states, “The concentration of women in the low-paid jobs, their low levels of literacy, education and union representation, and their extensive level of dependence on employers are strong markers of gender discrimination” (as quoted in Banerji & Willoughby, 2019: 26). Devoid of a sense of

agency and placed away from the traditional centres of power on the plantations, their voices are rarely heard in the existing discourse, with men on the tea plantations making most of the decisions on their behalf. One of the managers of a tea estate stated, “The factory is not for females. Factory involves heavy work with machines. In an environment surrounded by machines, female labours do not have the confidence” (as quoted in Baruah, 2018: 209). There continues to be an undue amount of pressure on women labourers on the tea plantations, particularly when running a family. At the same time, the male counterparts, Rasily argues, “are engaged in service-based occupations or do not work at all, this pattern of dominance and subservience continues to operate on tea plantations....The symbolism of the planter-manager-sahib remains in play, a colonial remnant of the past wherein the managers are considered gods and the workers bow down to the masters” (as quoted in Duara & Mallik, 2012: 177).

The liberalisation of the economy in the 1990s with the entry of foreign players in the Indian economy led to a tendency to hire a large number of casual labours, coupled with an increasing marginalisation of women’s work (Bhadra, 2004: 46). With growth rates rising post-liberalisation in the 1990s ushered in the question of how gender influences this phenomenon. Karan Kapadia argues that liberalisation has led to an “erosion of women’s rights and social status... and a deterioration in women’s position in contemporary India” (as quoted in Jackson & Rao, 2009: 63). The tea industry has thus witnessed a growing capitalisation of production, pushing women to gender-marked roles which have been specified for them (Khuswah, 2022: 2). Most of the women plantation workers are pushed further to the margins, as despite liberalisation the feudal structures in the tea plantations continue to be in play (Khuswah, 2022: 3). Combined with disturbingly low wages, generations of women plantation workers have been placed in a systematic cycle of perpetual poverty with little recourse to social mobility. However, the neoliberal reforms also brought

with it a crisis for the Indian tea industry, puncturing the relatively isolated nature of the tea plantations forcing many of the production centres to cease production, pushing erstwhile independent players out of the markets (Raj, 2015: 1). This had an enormous impact on the lives of the plantation labourers, pushing them into a seasonal employment cycle, forcing many of them to live either in poverty ridden conditions or seek work elsewhere (Raj, 2015: 3). The conditions of the women labourers on the tea plantations came to public eye with the BBC and Radio Four investigation, prompting leading brands to make promises to maintain ethical labour standards on the tea plantations from where they source their Tea (Rowlatt & Deith, 2015: 1). Plantation owners in India are obliged by law for ensuring that workers have access to proper sanitation facilities, despite the safeguards in place tea workers continue to live in homes which come with leaking roofs, and have terrible sanitation (Rowlatt, 2016: 1). Lax regulations, and the monopolisation of market by few players has led to an increased sense of vulnerability especially for the women plantation workers, as they continue to work under hazardous conditions. While neo-liberal reforms might seem to be a cause of celebration in some sectors, they have given a sense of legitimacy to the opacity of supply chains and enduring inhumane conditions for the workers who continue to work on the tea plantations.

## **CONCLUSION**

The depths of human suffering that tea plantation labourers have continued to endure have been left out of the larger economic discourse of complicated supply chains in the global tea industry. Here, the essay attempted to examine how liberal economic policies in India have allowed companies to marginalise further women tea plantation workers, who form the majority of the workforce, even further. There has been a constant devaluation of the work done by women on the tea plantation, with gender archetypes and existing patriarchal notions perpetuating age-old power structures. With the continual subordination of women tea

plantation workers, they have been positioned at the bottom of the plantation hierarchy. Investigations like the one done by BBC and Radio 4 allow us to look at how even in contemporary times, workers continue to be left malnourished and exposed to vulnerable conditions. Despite echoes of a change in the tea industry, it seems like tea plantations have continued to be transfixated onto a colonial past, wherein hierarchies are constituted by a pervasive cycle of human exploitation. They are faced with double marginalisation, as they are placed with the burden of even running the domestic space in their homes. The words of Karan Kapadia summarise the conditions of women in an Indian liberal economy, “liberalisation has led to an erosion of women’s rights and social status... and a deterioration in women’s position in contemporary India” (as quoted in Jackson & Rao, 2009: 63). Thus, it remains critical to trace the origins of Tea that we as consumers buy from the market shelves, and hold the players involved in the tea trade responsible for the continued subjugation of the workers on the tea plantations.

## REFERENCES

Banerji, Sabita, and Willoughby, Robin. (2019) ‘*Addressing the Human Cost of Assam Tea: An agenda for change to respect, protect and fulfil human rights on Assam tea plantations*’. Oxford: Oxfam.

Statista. (2022) ‘Volume of tea consumption worldwide from 2012 to 2025’, *Statista*, 22 June, available online at: <https://www.statista.com/statistics/940102/global-tea-consumption/#:~:text=Global%20tea%20consumption%202012%2D2025&text=This%20statistic%20shows%20the%20annual,7.4%20billion%20kilograms%20by%202025.&text=Tea%20is%20the%20second%20most,in%20the%20world%2C%20after%20water>, accessed 12 August 2023.

Venugopal, Rajesh. (2014) ‘Neoliberalism as Concept’, *Economy and Society*, 44 (2): 1-21.

Chandrasekhar, C.P. (2021) ‘Indian neoliberalism: A toxic gift from global finance’, *Frontline*, 6 September, available online at: <https://frontline.thehindu.com/cover-story/indian-neoliberalism-economic-reforms-at-30-a-toxic-gift-from-global-finance/article36290562.ece> , accessed 12 August 2023.

Dhekale, B.S., Sahu, P.K.. Mishra, P., and K,P., Vishwajith. (2018) ‘Trade liberalization and its impact on tea production of India’, *RASHI*, 3 (2): 26-33.

Larsen, Marianne. (2016) ‘Sustaining Upgrading in Agricultural Value Chains? State-Led Value Chain Interventions and Emerging Bifurcation of the South Indian Smallholder Tea Sector’, *Sustainability*, 8 (11): 1-19.

Bhadra, Mita. (2004) ‘Gender Dimensions of Tea Plantation Workers in West Bengal’, *Indian Anthropologist*, 34 (2): 43-68.

Laskar, Sabina. (2020) ‘*Role of Family and Trade Unions in Affecting Women Workers Fair Representation inside Trade Unions of Assam Tea Plantations*’, Masters thesis, International Institute of Social Studies, Hague.

Duara, Mridusmita., and Mallick, Sambit. (2012) ‘Tea Industry in Assam (India): Issues of Migration and Gender Discrimination’, *International Conference on History and Society Development*, Bangkok, 24 November.

Arora, Nayantara. (2022) ‘Chai as a Colonial Creation: The British Empire’s Cultivation of Tea as a Popular Taste and Habit Among South Asians’, *Oregon Undergraduate Research Journal*, 21 (1): 9-22.

Raj, Jayaseelan. (2022) *Plantation Crisis: Ruptures of Dalit life in the tea belt*, London: UCL Press.

Das, Gautam., and Dhanaraju, Vulli. (2019) ‘Issue of Marginality and Tea Garden Women in Assam, India’, *The research journal of social sciences*, 10 (6): 413-24.

Global Network for the Right to food and nutrition. (2016) ‘*A life without dignity- the price of your cup of tea*’. Heidelberg: Global Network for the Right to Food and Nutrition.

LeBaron, Genevieve. (2018) ‘*The Global Business of Forced Labour*’. Sheffield: University of Sheffield.

Business & Human Rights Resource Centre. (2021) ‘*Trouble brewing: The need for transparency in tea supply chains*’. London: Business & Human Rights Resource Centre.

Huxtable, Amy. (2021) ‘A cuppa reality: The truth behind your brew’, *University of Sheffield*, 23 April, available online at: <https://www.sheffield.ac.uk/research/forced-labour> , accessed 12 August 2023.

Postles, Hannah. (2018) ‘Labour exploitation is endemic in global tea and cocoa industries, international study finds’, *PhysOrg*, 31 May, available online at: <https://phys.org/news/2018-05-labour-exploitation-endemic-global-tea.html> , accessed 12 August 2023.

Das, Raju. (2015) ‘Critical Observations on Neo-liberalism and India’s New Economic Policy’, *Journal of Contemporary Asia*, 45 (4): 715-726.

Raj, Jayaseelan. (2022) *Plantation Crisis: Ruptures of Dalit life in the tea belt*, London: UCL Press.

Baruah, Juri. (2018) ‘The Public Versus Private Space: The Feminization of Work in Tea Plantation’, *ANTYAJAA: Indian Journal of Women and Social Change*, 3 (2): 207-217.

Jackson, Cecile., and Rao, Nitya. (2009) ‘Gender Inequality and Agrarian Change in Liberalizing India’ in Shahra, Razavi. (ed.) *The Gendered Impacts of Liberalization: Towards “Embedded Liberalism”*, New York: Routledge, pp. 63-90.

Kushwah, Rajeev Anand. (2022) ‘Women in the Tea Industry: Gender Roles, Unequal Pay, And Feudal Structures Disadvantage Female Labourers’, *Feminism in India*, 27 July, available online at: <https://feminisminindia.com/2022/07/27/women-in-the-tea-industry-gender-roles-unequal-pay-female-labourers/> , accessed 12 August 2023.

Raj, Jayaseelan. (2015) ‘The hidden injuries of caste: south indian tea workers and economic crisis’, *LSE*, 8 July, available online at: <https://blogs.lse.ac.uk/southasia/2015/07/08/the-hidden-injuries-of-caste-south-indian-tea-workers-and-economic-crisis/> , accessed 12 August 2023.

Rowlatt, Justin., and Deith, Jane. (2015) ‘The bitter story behind the UK’s national drink’, *BBC*, 8 September, available online at: <https://www.bbc.co.uk/news/world-asia-india-34173532>, accessed 12 August 2023.

Rowlatt, Justin. (2016) 'Indian tea workers' conditions remains very poor', *BBC*, 12 November, available online at: <https://www.bbc.co.uk/news/world-asia-india-37936349> , accessed 12 August 2023.