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NOTE

From:	General Secretariat of the Council
To:	Delegations
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Subject:	Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Council Directives 2001/110/EC relating to honey, 2001/112/EC relating to fruit juices and certain similar products intended for human consumption, 2001/113/EC relating to fruit jams, jellies and marmalades and sweetened chestnut purée intended for human consumption, and 2001/114/EC relating to certain partly or wholly dehydrated preserved milk for human consumption - Comments from the Slovenian delegation

Delegations will find attached the written comments from the Slovenian delegation on the Presidency's suggested amendments, as set out in 10222/2/23 REV 2.

Comments from the Slovenian delegation on Presidency revised text (10222/1/23 REV 2 dated 27 June 2023) on:

1. Honey Directive 2001/110/EC

Regarding the proposal to amend Council Directive 2001/110/EC relating to honey in the proposed ways listed below (Option 0 – 3),

Slovenia cannot support any of the proposed options, as we believe that the only option, which will provide sufficient information to consumers and will contribute to further improvement of traceability of honey, is the one listing all the countries of origin in descending order with the percentages indicated.

Please, find further explanations below.

[Option 0] [Only descending order, no additional text]

Slovenia finds this option as a not ambitious enough as it will not bring sufficient information for consumers. Furthermore, we believe it will be misleading for consumers. The honey blend might be composed 95% of honey from non-EU, and only 5% of honey from EU countries. In this case, if the labelling only listed Argentina and Slovenia as counties of origin, people might automatically assume the ratio between the shares of honeys in such honey blend is 50-50%.

In addition, Slovenia believes that in order to label countries in a descending order it will still require control bodies to identify the percentages of shares for each honey in the honey blend. Therefore, we believe that adding % for each country of origin will not create additional burden compared to option 0.

[Option 1] For the origin with the largest share, the percentage % shall be indicated. In case two or more origins have the same largest share, that share shall be indicated for all of them. A tolerance of [3%] shall be allowed.

Similar to IE, we also believe this option will not provide complete and sufficient information for the consumers; on the contrary, we see this option as highly misleading for them.

Labelling only the largest share will not be sufficient, especially in blends that contain more than 3 honeys in 1 blend. Again, Slovenia believes that in order to label country of origin with the largest share it will still require control bodies to identify the percentages of shares for each honey in the honey blend. Therefore, we believe that adding % for each country of origin will be absolutely no additional burden compared to option 1.

[Option 2] For origins with a share of over [30%], the percentage % shall be indicated. If the origin with the largest share is lower than [30%], its percentage shall be indicated. A tolerance of [3%] shall be allowed.

Similar to previous options, we believe that this option is will be misleading for consumers, as only up to 3 different honeys in the honey blend can be indicated on the label.

[Option 3] If the share of one particular origin exceeds [50%], this shall be indicated by supplementing the mention of that country by “more than [50%]”.

Similar to previous options, we believe that this option is will be misleading for consumers, as only up to 2 different honeys in the honey blend can be indicated on the label.

In relation to the proposed options above, Slovenia would like to discuss the experience gathered in those MS where an obligatory labelling of all countries of production is already established. Slovenia believes it is vital to take into account these experience and results as they show that such labelling is insufficient.

Additional comment:

Slovenia would like to stress the need to broaden the discussion on the revision of the honey directive. Improving the labeling provisions for honey blends represents only one element among many others, which need to be addressed to comprehensively tackle the problems the honey sector is facing.

The latest Commission's Report from the Hives indicates that 46% of imported honey was not compliant with the honey directive and thus with EU standards. In order to fight these adulterations and ensure that EU consumers can make informed purchases traceability of honey has to be improved.

Furthermore, it is very important to discuss quality criteria related to methods of production, like heat treatment, maturation and filtration and vacuum evaporation.

Additionally, area that should also be further discussed is the development of analytical methods for the detection of honey adulteration and quality characteristics.

2. Fruit Juice Directive 2001/112/EC

Original option 0 from Commission 'no fruit juices contain added sugars' may appear

Option 1 (alternative): "fruit juices contain only sugars that occur naturally in the fruit"

On the proposal from the Presidency on article 3, paragraph c, Slovenia finds Option 1 more appropriate. Option 1 gives a clearer information to the consumers and it decreases the possibility of misinterpreting the statement.

3. Marmalade and jams Directive 2001/112/EC

Slovenia can support changes proposed in REV 2 document.

Slovenia agrees with voluntary use of terms "jam" and "marmalade" as synonyms.

Regarding the Annex II and the quantity of pulp and/or puree used for the manufacture of 1000g of finished product for "jams" Slovenia can support:

- 450g as a general rule
- 350g for redcurrants, rowanberries, sea-buckthorns, blackcurrants, rosehips and quinces
- 150g for ginger
- 230g for cashew apples
- 80g for passion fruit

In addition, for "extra jams":

- 550g as a general rule
- 450g for redcurrants, rowanberries, sea-buckthorns, blackcurrants, rosehips and quinces
- 250g for ginger
- 290g for cashew apples

4. Milk Directive 2001/114/EC

Slovenia can accept all the proposals made from the Commission.
