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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 Estonian delegation

Delegations will find attached the Estonian delegation's comments in response to the request from the Presidency sent on 17 October, and the replies to the questions from the Presidency sent on 18 October, including replies to the questions posed by the Presidency in document 14004/23.

Comments from the Estonian delegation

Estonia agrees with the proposed text regarding the labelling of **honey** blends, according to which the countries of origin shall be indicated in descending order of their share in weight together with the percentage that each one represents. As a compromise, Estonia supports the wording presented in the proposal regarding certain flexibility on the indication of honey blends with more than four different countries of origin. The given right for MSs to establish certain labelling rules has not been analysed and discussed at the working party, therefore we are not aware of its effect on the Single Market. Therefore, we prefer harmonized EU-wide rules.

However, we would like a clarification whether for example in case of six different countries of origin of honey blend, must all six countries still be indicated (and percentages only for four of those six countries) or only four countries with percentages must be indicated?

Estonia agrees that an exception to indicate the origin of honey should be established only based on FIC regulation and that for honey packs of 30 g or less a two-digit ISO codes are allowed to use for indicating the countries of origin.

Estonia is in favour of developing the analysis methods necessary to detect honey fraud and considers that the 4-year deadline given for this purpose is essential and should be formulated in the text of the draft.

As regards **fruit juices** and **jams**, Estonia agrees with the amendments and proposed text.
