



Council of the  
European Union

Brussels, 19 October 2023  
(OR. en)

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**Interinstitutional File:  
2023/0105(COD)**

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14362/2/23  
REV 2

**LIMITE**

**AGRI 626  
AGRIORG 124  
AGRILEG 242  
FOOD 77  
CODEC 1921  
IA 261**

**NOTE**

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From: General Secretariat of the Council

To: Delegations

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No. Cion doc.: 8624/23 + ADD 1- ADD 4

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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 Czech delegation

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Delegations will find attached the Czech 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.

**Comments from Czech republic in the case of the Breakfast directives****Honey**

- Czech republic agrees with the mandatory indication of the countries of origin for honey mixtures on the product label.
- However, we disagree with the additional requirements – indication of percentage of honey of all countries of origin in descending order, because **there is currently no possibility of direct verification by laboratory methods**. This will only bring additional administrative burden for both supervisory authorities and manufacturers.
- Administrative verification by the supervisory authorities is currently underway, however the effects on the quality of the honey are debatable.
- Therefore, **we cannot support** the proposal to indicate the percentage of all countries of origin where the honey has been harvested, in descending order by weight, together with the percentage that each of the country represents.

**Small honey packages**

- Czech republic agrees with the proposed way of labeling the countries of origin for small honey packages in the form of two-letter codes, in accordance with the latest version in force of the international standard ISO 3166-1.

**Analytical methods for detecting honey adulteration**

- Regarding the issue of honey adulteration, in our opinion, we see it as appropriate to include in the text a four-year period in which the Commission will use its mandate to develop analytical methods to detect adulterated honey.

**Fruit juices**

- From the options presented, which relate to the claim about the presence of sugar in fruit juices, Czech republic supports the variant of the claim „no fruit juices contain added sugars“. We consider this variant to be clearer and more comprehensive for the average consumer.
- Czech republic can express its consent to the Commission being empowered to create an implementing act for the regulation that would concern fruit juices with a reduced sugar content.

**Fruit jams/Extra Jams**

- Czech republic can also support the proposed compromise regarding the increase of fruit content in Extra jams.

**Milk**

- Regarding the milk directive, Czech republic agrees with the proposal and has no additional comments.

19.10.2023

**Comments from the Czech Republic regarding the new elements related to the provisions of fruit juices and new empowerments for the Commission:**

1) The possibility to include a new empowerment for the Commission in order to lay down rules regarding the new technologies to be used to reduce the content of sugar in fruit juices; and

2) The possibility to include a new empowerment for the Commission in order to lay down the methods of analysis, taking into account international standards and technical progress, to verify whether the products listed in Annex I, Part I, points 1(a), 1(b), 2, 6(a), 6(b) and 7 are compliant with the provisions of this Directive. In addition, until the adoption of such methods, Member States shall, whenever possible, use internationally recognised validated methods of analysis such as those approved by the Codex Alimentarius to verify compliance with the provisions of the Directive 2001/112/EC.

**We would like to express our consent with both points mentioned above.**

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