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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 Slovak delegation

Delegations will find attached the Slovak delegation's comments and replies in response to the request from the Presidency sent on 20 December 2023, and that can be found in document 16745/23.

Slovak comments on the proposal regarding to the Breakfast Directives**Honey**

1.1 What is the opinion of the Member States on the introduction of a traceability system that requires Member States to trace back the entire supply chain of a given honey to beekeepers or harvesting operators in the case of imported honey (AM 21, 56)?

Slovakia supports the strengthening of the honey traceability system as it contributes to better quality of honey and more transparency on the market. However, we have concerns about the feasibility of these requirements (administrative and financial burden for beekeepers and official control authorities).

1.2 What is the opinion of the Member States on the proposed change of the definition of honey, in particular to exclude ultrafiltration, artificial evaporation and vacuum evaporation as allowed techniques and to introduce a new type of honey, namely 'unheated honey' (AM 19, 20, 26, 27, 29, 30, 31)?

Slovakia can support the proposed change.

Fruit juice

2.1 What is the opinion of the Member States on the proposal to introduce origin labelling for fruit in fruit juices (main AM 33)?

Slovakia does not currently see the need to introduce mandatory labeling of origin. The requirement to indicate the specific country of origin of the fruit would lead to additional administrative costs for producers, because our fruit juice producers use fruit from different countries around the world, and the list of these countries can change depending on the season and prices. The introduction of a requirement to indicate specific countries would require producers to adjust the labelling of their packaging, which also represents a financial burden.

2.2 What is the opinion of Member States on the proposal to restrict claims for reduced sugar fruit juices and to prohibit any comparative claims for those products in comparison with the fruits they originate from or 'normal' fruit juices (AM 36)?

Slovakia agrees with this proposal.

2.3 What is the opinion, in principle, of the Member States on the proposal to subordinate the creation of the new categories of reduced sugar fruit juices to the adoption of criteria better defining the essential physical, chemical, organoleptic and nutritional characteristics of an average type of juice (AM 37, 38)?

Slovakia supports the proposal.

Jam

3.1. What is the opinion of the Member States on the proposal to introduce origin labelling for fruits and sugar in jams (AM 39)?

Slovakia does not currently see the need to introduce mandatory labeling of origin. If our jam producers were required to specify the particular country of origin for the fruits and sugar, they would face a challenges. Indicating precise country origins may lead to higher administrative expenses and burden for producers, potentially affecting the final product's cost.

Other

4.1 Are there any other issues Member States wish to express concerning the content of the mandate of the European Parliament?

No comments.
