



Council of the  
European Union

Brussels, 8 January 2024  
(OR. en)

---

---

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

---

---

**16745/23**  
**ADD 12**

**LIMITE**

**AGRI 822**  
**AGRIORG 152**  
**AGRILEG 349**  
**FOOD 99**  
**CODEC 2489**  
**IA 365**

**NOTE**

From:	General Secretariat of the Council
To:	Delegations
No. Cion doc.:	8624/23 + ADD 1- ADD 4
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 Slovenian 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.

**Comments from the Slovenian delegation on Presidency's questions for the SCA (document 16745/23)*****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)?***

SI supports the introduction of a traceability system that would trace back the entire supply chain of a given honey to beekeepers or harvesting operators. Such a system will contribute to increased transparency, as it will provide comprehensive information on the honey origin. Furthermore, it would provide the necessary information for controlling the provisions on the labelling of honey blends and will help counter fighting fraudulent practices. At the same time, a traceability system will contribute to establish a level playing field for EU beekeeping sector.

Nevertheless, for the implementation of this system we would need more information on the details and foresee an appropriate transitional period. This period should be longer than 18 months proposed by the EP.

***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, 32, 67)?***

Honey is by definition raw and untreated. Therefore, SI does not see the need to introduce an additional definition for »unheated honey«.

SI in principle supports banning of technological processes that alter the quality of honey. Therefore, SI is positively considering the proposed changes by the EP regarding the exclusion of ultrafiltration and vacuum evaporation.

In relation to filtration, SI would be in favour of including a clearer wording from the recital 3c in Annex II, para 3 of directive 2001/110/EC, defining the size of the filter mesh that can be used for filtration at the size of 100 micrometres in the respective articles.

***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)?***

SI at this stage cannot support the EP proposal to introduce origin labelling for fruit in fruit juices due to lack of an impact assessment including the assessment of consumer expectations.

Additionally the availability of fruit for juice production is highly dependent on the season and on the EU and world market supply and demand. SI also sees origin labelling on fruit juice packaging as a potential source of food and packaging waste.

***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)?***

SI understands the purpose of the EP's proposal. Nevertheless, the primary objective of introducing a new category of fruit juices with a reduced sugar content is linked to health aspect.

As long as it is not allowed to add artificial sweeteners or sugars to this product category as proposed by the EP, SI believes that such a restriction is not proportionate.

***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)?***

SI in principal supports the approach in the Councils mandate to empower the Commission to adopt implementing acts laying down rules on the essential physical, chemical, organoleptic and nutritional characteristics of an average type of juice. SI could also support a formulation of the provisions into a more binding form with a time limit, but not to subordinate the creation of this new category.

***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)?***

SI at this stage cannot support the EP proposal to introduce origin labelling of fruit and sugars in jams and marmalades due to lack of an impact assessment, including the assessment of consumer expectations. As with the fruit for fruit juice production, the industry for jams and marmalades is also highly dependent on the season and on EU and world market supply and demand

***4. OTHER: 4.1 Are there any other issues Member States wish to express concerning the content of the mandate of the European Parliament?***

A discussion would be needed regarding EP AM 61 relating to the EU reference laboratory.

---