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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 Maltese delegation

Delegations will find attached the Maltese 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.

Malta's written comments on the questions on honey, fruit juice and jam

1. 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)?

Malta can support the introduction of a traceability system. An identifier code should give comprehensive information for regulatory authorities and consumers.

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)?

Malta is in favour of the proposed change to exclude procedures that enable fraud, and the introduction of the new type of honey 'unheated honey', however it has concerns on the exclusion of artificial evaporation from the definition of honey.

According to the Honey Directive (2001/110/EC), the moisture content of honey should not be more than 20%. Given that honey is hygroscopic and the relatively high humid conditions of Malta, the moisture content of Maltese honey tends to be high, particularly in carob honey harvested in autumn. Furthermore, the shortage of rainfall which is affecting the floral resources, such as nectar, is in return limiting bees from naturally dehydrating the honey as they do not manage to cap the honeycomb by the end of the season.

2. 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)?

Malta does not have an objection to the origin labelling for fruit in fruit juices.

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)?

Malta has no comments on 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)?

Malta has no comments on this proposal.

3. 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)?

Malta does not have an objection to the introduction of origin labelling for fruits in jams. While sugar is an important ingredient in jams, the inclusion of the origin of sugar as well would not be of any benefit to consumers as it does not impart the characteristic of the product but only the sweetness level.

4. Other

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

Whilst Malta supports any legislative changes that empower consumers to make informed choices, one needs to find a balance in the amount of changes that the industry is obliged to do since for small countries, with microenterprises being the norm, printing of new labels and disposing of old stocks may be an economical hurdle.