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**NOTE**

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| 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<br>- Comments from the Czech delegation |

Delegations will find attached the Czech 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.

**Answers of the Czech Republic to the questions regarding the Breakfast  
Directives (doc. 16745/23)**

**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)?*

**Answer:** In our opinion, the honey traceability system will be highly administratively demanding for both producers and supervisory authorities. The Czech Republic cannot support the introduction of such system. We understand the intention of the exemption for small beekeepers with up to 150 bee colonies, but it is necessary to take into account that this exemption will also cover honey processors who do not have colonies and only mix honey from different beekeepers and resell it.

*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)?*

**Answer:** The Czech Republic can support the introduction of a definition for honey and on the prohibition of ultrafiltration and other methods and on the introduction of a new type of honey.

**Fruit Juices:**

*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)?*

**Answer:** The Czech Republic currently does not see any need to indicate the origin of fruit in fruit juices on the label. According to our opinion, it would significantly increase the administrative burdens for producers and supervisory authorities. Moreover, it is not currently possible to verify this information in a laboratory.

*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)?*

**Answer:** The Czech Republic 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)?*

**Answer:** The Czech Republic expresses a positive attitude to the introduction of new categories of juices with reduced sugar content and also to the introduction of new criteria for the physical, chemical, organoleptic and nutritional properties of juices (if differ from the regular fruit juices (fruit juices from concentrate)). The physical, chemical, organoleptic and nutritional properties of new categories of juices should be adopted at the same time as the whole directive (as mentioned bellow – 4.1).

**Jams:**

***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)?***

**Answer:** The Czech Republic currently does not see any need to indicate the origin of fruit and sugar in jams on the label. According to our opinion, it would significantly increase the administrative burdens for producers and supervisory authorities. Moreover, it is not currently possible to verify this information in a laboratory.

**Other:**

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

**Answer:** The Czech Republic is fundamentally opposed to any possible shortening of the transposition period. Since these are directives, it is necessary to amend the national legislation (four decrees), which is a very time-consuming matter.

As mentioned above (2.3) it is also not suitable to change the directives after their final adoption as suggested in some amending acts because it would be necessary to amend the national legislation again. For example, it is the case of AM 37 and 38 (Report of the Committee on the Environment, Public Health and Food Safety, doc. A9-0385/2023 from 04.12.2023).