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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 Hungarian delegation

Delegations will find attached the Hungarian 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.

Written Comments of Hungary16745/23Honey:

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)?

We agree with the introduction of the monitoring system for honey proposed by the European Parliament. At the same time, for its practical implementation, we would consider it important to create a unified EU monitoring system, as this would also help the Member States in carrying out inspections.

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)?

We agree with the exclusion of ultrafiltration, artificial evaporation and vacuum evaporation.

The Amendments 32 and 67 aim to introduce in Annex II. paragraph 4 a new 6a. point, so we recommend the retention of the amendment 67.

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)?

With regard to the EP proposal to introduce the designation of origin of fruit in fruit juices, in our opinion it is not typical for fruit juices to use fruit from third countries for the produced products and there is no product counterfeiting similar to honey. Therefore, we do not support the labelling of origin regulations proposed by the EP regarding fruit, the burden of its implementation goes beyond the supposed benefits. In addition, the source of purchase of fruits is constantly changing, so the constant change of labels can cause problems.

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)?

The amendment: "(7a) The label of fruit juice with a reduced sugar content or fruit juice with a reduced sugar content made from concentrate referred to in point 6 of Annex I cannot be indicated with natural fruits in the juice or items 1-4 of Annex I. claims regarding positive properties - such as favourable physiological effects, ingredients or nutritional value - that can be established during a comparison with the products listed in". It is not clear what the prohibited claim of "beneficial physiological effects, ingredients, or nutritional value" means. In our opinion reduced sugar content is an authorized nutrition claim, any other type of claim or authorized health claims that meet the requirements of Regulation (EC) No. 1924/2006 can be indicated on the product.

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)?

We do not support the amendment made by the EP.

Jam:

3 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)?

Regarding the EP proposal to introduce the designation of origin of the fruit and sugar used in jams, in our opinion it is not typical for jams to use fruit from third countries for the products produced, and there is no product counterfeiting similar to honey. Therefore, we do not support the labelling of origin regulations proposed by the EP regarding fruit and sugar content, the burden of its implementation goes beyond the supposed benefits. The indication of the origin of the sugar is not justified in any way, it does not influence the consumer's choice (by the origin of the sugar we mean the country where the sugar production process takes place, not the origin of the raw material). In addition, the sources of fruit and sugar are constantly changing, so the constant change of labels can cause problems.

Other:

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

We do not support amendment 23. At the same time, we draw attention to the fact that amendment 59 contradicts amendment 23, since amendment 59 refers to "the exact mixed" percentages. The indication of percentage limits is a bigger problem for producers than the display of exact ratios.

We do not support amendment 25, as a tolerance of 5% is already provided for each mixture component.
