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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 Estonian delegation

Delegations will find attached the Estonian 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.

Estonian answers to the questions regarding Breakfast Directive**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)?

Estonia considers that the current traceability system is sufficient, allowing the Competent authorities to check the origin of honey based on the documentation, i.e. the batches of honey must already be labelled.

What exactly is meant by the traceability system, i.e. is it a specific code for the honey batch and is there a virtual database? Does such a change also mean the opening of Regulation 178/2002?

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)?

Estonia considers that in regard eliminating honey fraud, the proposed changes of certain definitions seem a reasonable solution. Estonia finds that more time is needed to give a final position because this topic needs a technical discussion.

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)?

Regarding the proposal, size and scope of its impact have not been assessed at this time. Therefore, Estonia cannot support this proposal. Furthermore, the origin of fruit and fruit juices has not been discussed at the expert level before.

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)?

Estonia considers that the explanation in the Council proposal is sufficient, and that there is no need to add the text (7a) presented by the European Parliament. The Council’s proposal already states that the use of this label does not apply to reduced sugar juice categories. If necessary, the explanation proposed by the European Parliament can be added as a footnote in the draft.

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)?

Estonia can agree that Brix values should be established for these products, as this would facilitate controls.

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)?

Regarding the proposal, size and scope of its impact have not been assessed at this time. Therefore, Estonia cannot support this proposal.
