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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 Latvian delegation

Delegations will find attached the Latvian 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 from Latvia

Latvia is glad for opportunity to share answers on Belgian Presidency questions in view of the upcoming discussion of the above-mentioned proposal at the meeting in the Special Committee on Agriculture on 8 January 2024.

1. HONEY

Questions:

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)?

Latvia supports the implementation of traceability, which requires, in the case of imported honey, to trace the supply chain from honey harvesting to the packaging of honey mixtures. This would be greatly appreciated as it would ensure that imported honey does not lose its true origin.

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)?

Currently, Latvia does not have a final opinion on the changes in the definition of honey proposed by the Parliament, as it is still necessary to determine how such changes will affect Latvian honey producers.

2. FRUIT JUICE

Questions:

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)?

Latvia **cautiously evaluates** the mentioned proposal. Due to the changes in the proposal, there are expected to increase the price of the products, as the financial and administrative burden on producers will increase by changing the labeling every time the suppliers of raw materials are changed.

In Latvia's assessment, the current regulation of the juice industry and the proposal for amendments prepared by the Council are optimal, therefore **Latvia does not support** the proposal to indicate the country of origin of fruit in the labeling of fruit juices without an impact assessment on the industry.

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)?

Latvia **doesn't mind to** the framework of the 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)?

Latvia believes **that it is essential** for the new category of fruit juice ("reduced-sugar fruit juice") **to set criteria** that would better define their essential physical, chemical, organoleptic, and nutritional characteristics. We do believe that **it is important in the directive to determine both the exact definition of the product and the methods permitted in the production of the product.**

3. JAM

Question:

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)?

Latvia **does not support** such a proposal, as it believes that the proposal will create an unnecessary burden for producers. Since the market for fruit and sugar raw materials is variable both in terms of availability, price, and quality of raw materials, which in turn are determined by unpredictable economic, political, and climatic changes, the producer must be able to quickly adapt to said changes promptly, including making changes to the labeling to update the fruit indications of the countries of origin of the jams. If such a proposal is accepted, it will cause additional costs, changing labels will become time-consuming, will cause an increase in the amount of waste, therefore, in Latvia's opinion, it would be necessary to initially carry out an assessment of the impact of the said proposal on the industry.

4. OTHER

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