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European Union

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NOTE

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 - Comments from the Greek delegation

Delegations will find attached the Greek 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.

Replies from the Greek delegation

Following PR's explanatory note No 16745/23 in view of the discussion in today's SCA, please find below **EL replies on questions 1.1 and 1.2 for honey:**

Question 1.1:

The establishment of a honey traceability system, which will require Member States to support the ability to monitor the entire "chain" of production and supply of honey, both at the level of production (Beekeepers) and at the level of marketing and trade, is a positive and important tool for the supervision of imports and for the monitoring of the honey market, thus contributing to the protection of European beekeeping products and the consumers . The establishment of honey traceability mechanisms and the monitoring of the "honey balance" of European producers and traders, in combination with the operation of digital recording and monitoring systems of beekeepers and beehives, such as those already operating in Greece, can help in this direction."

Question 1.2:

We consider that terms such as "ultrafiltration", "artificial evaporation" and "vacuum evaporation", should be removed from DIRECTIVE 2001/110 EC. Ultra-filtered honey cannot be included among the categories of honey mentioned in the DIRECTIVE, because in this way the process of removing the pollen grains, that are necessary for its identification is legitimized. Moreover, our opinion is that the evaporation of the moisture of the honey can and should take place, only inside the beehive in a natural way before the sealing of the beehive cells of the honeycombs, by the bees. A product produced with the use of artificial means such as those mentioned above, for the removal of moisture and dehydration, is not in accordance with the definition of honey as given in par. 1 of the ANNEX I of the DIRECTIVE 2001/110 EC. In addition, we consider that the term "unheated honey" can be mentioned as a characteristic of a special quality classification.