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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 Netherlands delegation

Delegations will find in the Annex the comments from the Netherlands delegation on the above-mentioned proposal.

Comments from the Netherlands delegation

Thank you for giving us the opportunity to send in questions for clarification regarding the proposed breakfast directives.

We would like to ask the following:

- How has DG Santé been involved in the proposed breakfast directives?
- How do the proposals regarding origin labelling relate to the expected changes (on origin labelling) within the FIC (1169/2011)?
- Why has been chosen for a Directive instead of a Regulation?
- The proposed adaptations for legislation on fruit & vegetables have been included in the impact assessment report (EOC 8624/23 add 4) as Annex 9. We foresee additional workload and costs for producers which will have possible negative consequences (affordability, clear understandable and readable label) for consumers. The possibility to react on these proposals is limited to comitology, can the Commission react on this?

- What is the expected impact of the proposed changes in Council Directive 2001/110/EC of 20 December 2001 relating to honey on the enforcement of this directive? In table 10, page 116 these costs are estimated as approximately 0. How does this fit with the proposal to mention all the origin countries, also non EU on the label of a blend honey? What risks are seen regarding deception and fraud in this aspect?
- With regard to the Council Directive 2001/112/EC of 20 December 2001 relating to fruit juices and certain similar products intended for human consumption, 2 types of processes are mentioned to reduce sugar content. Is it possible to reckon with possible new innovative processes that could be also used for this aim in the future?
- With regard to Council Directive 2001/113/EC of 20 December 2001 relating to fruit jams, jellies and marmalades and sweetened chestnut purée intended for human consumption: how does the Commission value the rise in environmental costs (prolonged pasteurising time for a jam with lower water content) against the benefit for health (more fruit, less (added) sugars)?