



Council of the
European Union

Brussels, 25 May 2023
(OR. en)

Interinstitutional File:
2023/0105(COD)

9697/23
ADD 1 REV 1

LIMITE

AGRI 271
AGRIORG 62
AGRILEG 86
FOOD 43
CODEC 939
IA 119

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 in the Annex the comments from the Greek delegation on the above-mentioned proposal.

Comments from the Greek delegation

Please find below Greece's comments on the questions which Member States were invited by the Swedish Presidency to answer in preparation for the meeting on 26 May:

Fruit juices:

The proposal on fruit juices is aimed at creating a category for fruit juices where the sugar content has been reduced in response to such products already being on the market. The requirement for a reduction of at least 30 % of the sugar is in line with similar legislation. Membrane filtration and yeast fermentation are stated as authorised processes.

a. Do you agree to the inclusion of a category of fruit juice with reduced sugar?

We have no objection. Nevertheless, we must be cautious not to negatively equalize in consumers mind, the natural sugars contained in fresh products with the added sugars in other processed products and enhancing unfair competition with products like soft drinks.

b. Do you agree that membrane filtration and yeast fermentation are to be authorised processes?

We have no objection, providing that the juice industry is ready for that.

Jam and marmalade:

In the proposal on jam and marmalade the quantity of fruit required in jam and extra jam is increased.

a. Do you agree with the increase in the quantity of fruit required in jam?

We have no objection, since the proposed increase is already a reality in the market and it will support primary production.

b. Do you agree with the increase in the quantity of fruit required in extra jam?

We have no objection, since the proposed increase is already a reality in the market and it will support primary production.

c. Do you agree with opening up for the term marmalade to be used also for jams?

We must be cautious in changing long time established terms, since, in this case, consumers are likely to be confused.

d. Do you expect that the increased requirement for fruit content may have an impact on the price to the consumer?

It is not easy to reply on that, since proper market studies should be conducted. In general, since the proposed increase is already a reality in the market, the increase shouldn't have an impact on prices. Still, market operators always look for opportunities to increase prices and so we have to be cautious.

Milk products

a. Do you agree with authorising a treatment to produce lactose free dehydrated milk (similar to what is already possible for liquid milk)

We have no objection to that since it is already authorized for liquid milk.

Nevertheless, we find the comments/questions from BE and EE reasonable and we would much appreciate a response relatively and express an additional request for more clarification on the last sentence in point 3 (d) of Annex I (What is meant under the “limitation of modifications”?).

EL COMMENTS - HONEY

Views on the proposed amendment of Directive 2001/110/EC for honey

The establishment of the obligation to indicate on the label of the package, all the countries in which the honey was harvested, is an important tool in the direction of preventing the risk of misleading the consumer public, regarding the geographical origin of the product, in the case of mixtures of honeys originating from more than one country.

The provision can be improved for the benefit of the consumers and the beekeepers by establishing of the obligation to list all the countries in which the honey was harvested, thus preventing the risk of misleading consumers, regarding the geographical origin of the product, in the case of mixtures of honeys originating from more than one country

The proposed amendment may affect packaging costs. However, it seems that it can add value to the product and increase its demand from consumers. In the Greek market, excessively low prices of the product, lower than the production cost, are observed. This situation seems to occur, among other things, due to the lack of information of marking on the label, and gives the opportunity to honey packers - traders to sell honey of lower value (both in terms of production costs and in terms of nutritional quality), which comes from third countries, to flow into the Greek-European market, sometimes legally, sometimes illegally, compressing prices far below production costs, which causes distortions and conditions of unfair competition against Greek and European beekeepers and misleading consumers.

In Greece, the operation of a special digital service for monitoring the honey production, trading circuit has been launched, with the simultaneous establishment of the obligation to declare the necessary trading data by honey traders, on a relevant digital platform. Therefore, we believe that the competent authorities in our country will very soon be able to verify the information proposed to be written on the label.