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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 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.

EL COMMENTS

Honey

We are in favour of option D as regards the labelling of honey blends.

In Greece, the operation of the National Electronic Beekeeping Register (NEBR) and the procedures for the development, organization and operation of the relevant information database have been established.

The purpose of the register is to establish a single digital system of recording, inventory and identification of beekeepers, beekeeping farms and beekeeping capital and the complete and uniform recording of the state of beekeeping in the Country, with the aim of proper planning for the support and development of the sector.

The establishment of the NEBR provides the technical possibility, among other things, for the supervision of imports and the monitoring of the honey market, thus contributing to the protection and promotion of domestic beekeeping products, the safeguarding of producers and the consumer public, from phenomena forgery and/or misrepresentation. It also contributes positively to the establishment of mechanisms for the traceability of honey and other beekeeping products and to maintaining a balance of beekeeping products.

At the same time, aiming at the traceability of beekeeping products, the digital platform "e-honey" (honey balance) has been developed, which will be available to producers and packers - traders of honey through the Governmental Digital portal.

Through this platform, it is possible to implement the mandatory declaration and monitor the following data:

- registration of a manufacturing-commercial enterprise,
- declaration of production volume,
- manufacturer's sales statement,
- declaration of purchases of a manufacturing company or a commercial wholesale business,
- statement of sales of a manufacturing company or a commercial wholesale business.

Fruit juices

Regarding the optional sugar labelling of fruit juices, we believe that:

- a) natural sugars in fruit juices should not be associated in the consumer's mind with the added sugars in soft drinks. So a statement like "only natural sugars are included" would be in the right direction.
- b) The compatibility of this labelling with the provisions of regulation 1169/2011 must be examined.

JAM

Regarding the fruit content in the two jam categories, we consider it is good to adopt the proposal referred to 450 gr of fruit per kilo for jam and 550 gr of fruit per kilo for extra jam, because this would enhance the primary production and is in line with the strategy for healthier food and reducing food waste.

Milk

Regarding the authorization of a treatment to reduce lactose content in dehydrated milk, we would like to draw the attention of the Commission to the implementation of Reg. (EU) 1308/2013 and (EU) 1169/2011 uniformly throughout EU by the market and the national authorities. Drinking milk is already being circulated in the EU market as “lactose free” and even during the discussions of this working group, this term is being used widely. Since no definition for “lactose free” exists, as has been clarified by the Commission, it would be necessary to issue harmonized guidelines at EU level, in order for everyone to have a common understanding of the reduction of lactose in products and the related labelling .
