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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 Cyprus delegation

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

Comments from the Cyprus delegation

Annex:

Questions which Member States are invited to answer in preparation for the meeting on 26 May

Honey:

The proposal on honey is aimed at reducing the risk for consumers being misled by the labelling of honey blends with origin.

a. Do you think that the proposed change will sufficiently reduce that risk? You are welcome to motivate your answer.

Yes. Harmonised rules in the EU are necessary because the markets of many Member States include both honey that is subject to national law requiring the indication of each country of harvest and honey that is subject only to the requirements of the EU Honey Directive (i.e. indication “EU Honey”, “EU and non-EU Honey”, etc).

We also share the opinion that honey has quality related to specific areas and therefore more specific origin labelling will empower the consumer to make more informed choices.

b. Will the proposed change have any negative consequences on the administrative burden for producers and/ or packers? To what extent could this have an impact on the price to consumers?

Honey packers in Cyprus are already required to indicate each country of harvest, in line with national law. When this requirement becomes part of EU law, then the packers in Cyprus shall no longer be able to complain that they are not treated equally with honey packers in other EU member states.

In Cyprus honey packers are allowed to print the countries of harvest of the honey with laser printing directly on the honey jar (which is either plastic or glass or metal) or the lid. In this way they can easily adjust the laser coding equipment according to the harvest countries of each batch. This is the same method used by many food businesses for date marking.

c. Some Member States have, in the Council, expressed a wish to see a requirement for labelling with a percentage/ share of the honey. If you propose this, can you see that Member State’s control authorities will be able to verify this information?

The State General Laboratory of Cyprus will not be able to verify the percentage with a laboratory analysis. Administrative checks will be used to verify the use of each honey batch of specific country origin in each blend, but will not always suffice for confirming the accuracy of the percentage/share. We are not in favour of constituting the information of percentage/share compulsory on the labelling. We would also like to note that for the average Cypriot consumer the favourite honey is Cypriot honey, and therefore he/she prefers honey that is 100% Cypriot. If a honey is a blend of Cypriot honey with honey of any other country, that honey will immediately be much less favourable even if the % for each country of harvest is not given on the label.

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?

Yes.

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

Yes.

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?

Yes, because this will probably have a positive effect on boosting primary production and possibly also on the reduction of food waste at the production level. However, careful consideration should be given on how other factors may be affected, such as use of pectin and additives.

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

We agree but we could also accept 500g of fruit per 1kg jam if at the same time the increase for normal jam is to 400g instead of 450g.

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

Yes. This is particularly desirable for Cyprus, because the translation in the primary official language of Cyprus (Greek) of the term jam is generally unknown among Cypriot consumers and causes confusion.

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

It might lead to a very small increase on the price.

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).

Yes. However, it is at the same desirable that the EC enacts prerequisites and limits for the use of the terms “lactose free” and “lactose light”.