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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 Bulgarian delegation

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

Comments from the Bulgarian delegation

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, the change should lead to reducing the risk for consumers being misled by the labelling of honey blends with origin. The consumers have the right to definitely be informed which is the origin and what is the quality of the honey that they consume. The Bulgarian Food Safety Agency maintains the position to indicate the quantity of honey in the relevant product in percentages.

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?

The accurate identification of the point of origin of honey would provide the necessary information to consumers without significantly increasing the administrative burden for producers and/or packers, and the change would not follow to affect the price for consumers.

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 control authorities such as the Bulgarian Food Safety Agency can verify compliance with the requirement for labelling with a percentage/share of honey with several countries of origin at producer and packaging plant level, based on the documentation/ records kept for each of the batches, in order to have informed consumer choice.

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, we agree.