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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 Croatian delegation

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

Croatian answers to the questions form Note from the Swedish presidency on future work on the revision of the Breakfast Directives (Doc. 6014/2023 INIT)

Croatia wishes to thank the Swedish presidency for preparing the questions for the discussion on the revision of the Breakfast Directives. We hereby want to support the proposed amendments, but we have some concerns regarding the proposed schedule of Council WPs, as well the calendar of the adoption which is very ambitious.

We send our preliminary comments and we need to stress out that we are still analyzing the proposals and discussing at national level.

HONEY

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

- 1. Do you think that the proposed change will sufficiently reduce that risk? You are welcome to motivate your answer.**
- 2. 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?**
- 3. 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?**

Croatia welcomes the proposed amendment and introducing mandatory labelling of countries of origin for honey blend. Although, we believe that there is a need for more transparency of information for packaging of less than 25 g. We are aware that according to Regulation (EU) 1169/2011 small packaging of food need to have only few information labelled, but we would like to point out that Honey directive is a vertical act, and that Regulation (EU) 1169/2011 shall apply without prejudice to labelling requirements provided for in specific Union provisions applicable to particular foods (Honey directive in this case).

Furthermore, although we are aware of challenges in verifying information on the percentage of each honey, we believe that clear information on the share of each honey in the blend, would give much more transparency for the consumers. Often, we encounter cases where honey from one country is dominant and domestic honey is blended in marginal quantities.

FRUIT JUICES

- 1. Do you agree to the inclusion of a category of fruit juice with reduced sugar?**
Yes, inclusion of such a category is in line with the desired shift to healthier diets and the goals of the WHO/Europe sugar and calorie reduction initiative. Since reduction of fruit juice intake as a source of sugar could be challenging for some populations (e.g. children), this offers a good alternative. As well, consumers are becoming more interested in such products and demand changes.

- 2. Do you agree that membrane filtration and yeast fermentation are to be authorised processes? (Is it sufficient to meet technical innovation)**

We are concerned that the process of yeast fermentation could in some cases alter the nutritional composition and sensory properties.

- 3. Will the requirement “all the other essential characteristics should remain unchanged” be an obstacle to placing these products on the market?**

No, if there are available processes which do not alter the essential characteristics.

As general comment, we have some concerns regarding the statement “no fruit juice contains added sugar”. Namely, we consider necessary to introduce this possibility for fruit juices but in order to provide the consumer with the exact information, other statements could be used, such as “no added sugars, contains naturally occurring sugars”. Additional reasoning is to enable fair competition for this category of products.

Also, we propose transitional period of 3 years in order to ensure an easy switch for industry.

JAM

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

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

Yes, as it will contribute to a reduction in sugar consumption and as such fulfills the goal to facilitate the switch to more healthier diets.

- 2. To what extent will these products improve health and sustainability.**

Maybe as a standalone measure it seems that there is no significant influence on health, but as a part of more comprehensive measures, we believe that increase of fruit content in jams will lead to more nutritional quality of these products, referring here, not only in sugar reduction, but also other compositional advantages of fruit.

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

We are still discussing this proposal because we have some concerns that this change could be confusing for consumers which are now accustomed to new current terms. Also, we need a clarification, does the provision “Member States may, however, authorize that the term ‘marmalade’ be used for the product named ‘jam’” mean that MS should choose one term marmalade or jam.

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

Yes, since more fruit will be needed which is more expensive than sugar and the production process cost will increase as well.

As general comment, we propose transitional period of 3 years in order to ensure an easy switch for industry.

Furthermore, we consider that there is a need to revise Annex I, point II. in order to enable that jams with lower levels of sugar (without sweeteners) can bear the name jam. Currently, soluble dry matter content of 60 % is possible only for products where sugars have been wholly or partially replaced by sweeteners.

“Products defined in part I. must have a soluble dry matter content of 60 % or more as determined by refractometer, except for those products with lower sugar content or product in respect of which sugars have been wholly or partially replaced by sweeteners.”

MILK

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

Yes, Croatia agrees with authorizing this treatment.
