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European Union

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**LIMITE**

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**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 Maltese delegation

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

**Malta's written comments on the questions on honey, jam and marmalade and milk products**

**In general, Malta agrees that the provisions concerned should be revised, in view of the innovation of production processes and also changing societal concerns and consumers' demands.**

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.

**The proposed amendment to eliminate the term 'blend' and include all countries of origin will improve harmonization and transparency and in turn reduce the risk of consumers being misled by the label.**

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 proposed changes are expected to bring about administrative burden for packers as they have to adapt their labels according to the new requirements. It is well known that the local producers tend to order a large number of labels so as to keep the cost of labelling as low as possible. Thus, it is important that any labels that were already printed "may continue to be marketed until the exhaustion of stocks". A possible impact on the price to consumers may be expected.**

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 percentage share of honey will provide additional transparency on the origin of the honey, and hence would further assist consumers. The determination of the exact percentage and controls for verifying such percentages may be challenging, and would also heavily increase the burden on the industry and related costs. Furthermore, it would be very difficult for the competent authorities to verify this information at production sites, let alone at retail stages whereby competent authorities mainly rely on analysis of the products.**

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.**
- b. Do you agree with the increase in the quantity of fruit required in extra jam? **Yes.**
- c. Do you agree with opening up for the term marmalade to be used also for jams? **Unsure.**
- d. Do you expect that the increased requirement for fruit content may have an impact on the price to the consumer? **Yes.**

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)?

**Given that it is already possible for liquid milk, it is considered that it can also be used for dried milk as well.**

Malta's written comments regarding Article 2 – Amendments to Directive  
2001/112/EC

The proposed amendment in Article (2) (1) (b) states that the product designations may be used in the “official language of the Union of the Member State where the product is placed on the market”.

Malta requests that the wording in this sub-paragraph is aligned with Article 15(2) of EU Regulation 1169/2011 on food information for consumers which states: “Within their own territory, the Member States in which a food is marketed may stipulate that the particulars shall be given in one or more languages from among the official languages of the Union”.