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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 Slovak delegation

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

**Slovak comments on the proposal regarding to the Breakfast Directives for the discussions
on 26 May 2023**

Honey:

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

Slovakia welcomes the change regarding to the origin labelling of honey blends. However, the Commission stated that the percentage / share of honey is not controllable and causes the administrative burden for producers and / or packers, therefore we consider that it necessary to add the way of indication of countries origin to the proposal, e.g. in ascending or descending order of weight to avoid to misleading to the consumers. It may be stated as the country of origin Slovakia on the label, but in fact the proportion of Slovak honey in the honey blend may be very low, e.g. 5%.

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

We have experience that honey and mixed honey imported from third countries is cheaper and has a negative effect on our market, on our FBO(s) and of course on our consumers. It is possible that a change of labels will affect the price of the final product, but as we mentioned above, we welcome such a change.

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?

We consider it is verifiable through delivery notes / documents by Member State's control authorities, however the Commission stated that the percentage / share of honey is not controllable and causes the administrative burden for producers and / or packers.

Fruit juice:

a) Do you agree to the inclusion of a category of fruit juice with reduced sugar?

Preliminary we don't have any comments regarding to the new category of fruit juice with reduced sugar, however we welcome the answer to the Germany comment relating to EFSA opinion - consumption the fruit juice is link in with increased risk of type 2 diabetes and gout.

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

Preliminary we don't have any comments regarding to the membrane filtration and yeast fermentation, however during yeast fermentation can rise a risk of formation of ethanol or glycerol. Moreover, there are also several types of membrane filtration, perhaps it would be appropriate to add this to the draft directive.

Jam and marmalade:

a) Do you agree with the increase in the quantity of fruit required in jam?

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

Our FBO(s) do not support increase in the quantity of fruit required in jam because of increase of in the price of the final product. Increasing the fruit content may result in the addition of pectins (depending on the type of fruit) and may result in a longer technological process (evaporation of water), which may result in an increase in energy consumption.

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

Yes, we strongly support to discussion on this topic.

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

Yes, we do. The increased proportion of fruit content can also be reflected in the increased content of sugar as an ingredient, which is not one of the cheapest raw materials.

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, it is necessary to take into account the demands of consumers.

Slovak Position for Working Party on Breakfast Directives

on 12 June 2023

Jam and marmalade

At the national level our FBO(s) are not in favour of the Commission's proposal. However, we can support increase of fruit in jam and extra jam for order to achieve a reduction in sugar content and also that consumers can decide to buy healthier products. Due to a reasonable compromise Slovakia opted for **option B** of the Chair's Flash, i.e. increase to 400 g in fruit jam and 500 g fruit in extra jam.