



Council of the
European Union

Brussels, 9 June 2023
(OR. en)

**Interinstitutional File:
2023/0105(COD)**

9697/23
ADD 5 REV 1

LIMITE

**AGRI 271
AGRIORG 62
AGRILEG 86
FOOD 43
CODEC 939
IA 119**

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 Lithuanian delegation

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

Comments from the Lithuanian delegation**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 new proposal to indicate the country of origin of each honey in honey blends is a step towards increasing consumer awareness. We propose to consider the possibility of mandatory indication of all individual countries of origin, including a percentage. Labelling the country of origin of honey blends provides consumers with clear information on the origin of the honey blend. It is important for every consumer to be able to make informed choices. Knowing the country or countries of origin of a honey blend allows consumers to choose the product that best meets their expectations. Mandatory indication of all individual countries of origin builds trust between consumers and producers.

b. Will the proposed change have any negative consequences on the administrative burden for producers and/ or packers?

The proposed new origin labelling for honey blends is likely to impose a certain administrative burden on producers. Producers are likely to have to dedicate more resources to ensuring a traceability system (especially those producers who produce honey blends from honey from several or more different countries). The new requirement for countries of origin or country of origin labelling on the packaging of honey blends may also create additional costs to produce new labels, but it is important to note that the proposal to amend the Directives includes transitional provisions that products placed on the market may be marketed until stocks run out, which should help to accommodate the changes.

c. To what extent could this have an impact on the price to consumers?

If producers and/or packers have to go through additional procedures (documentation, new traceability systems) in order to comply with the new labelling requirements, this may affect the price of the honey blend for consumers. Producers will also need to update their labels to include all the different countries of origin of the honey blend. This may lead to additional costs and affect the final price. It is important to note that forecasting price changes can be difficult as it depends on several factors, including the scale of producers' activities, market competition and demand.

d. 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 of the Member States can verify the accuracy of the information provided on labels during document checks.

Fruit juices

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

We agree to the inclusion of a category of fruit juice with reduced sugar.

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

We agree that membrane filtration and yeast fermentation are to be authorised processes.

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

The requirement that “all other essential characteristics should remain unchanged” may not necessarily be an obstacle to introducing these products to the market. If proposed changes, such as membrane filtration or fermentation with yeast, do not fundamentally alter the essential properties of the product, then the requirement should be met.

Jam and marmalades

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 and extra jam?

We agree with the increase fruit content required in jams and extra jams. Increasing the fruit content can improve the taste and quality of jams and extra jams by giving a more intense and authentic fruit flavour. Higher fruit content may increase the nutritional value of the product, but the use of higher fruit content may increase the production costs for producers of jams and extra jams. This may lead to higher retail prices for these products, which may affect consumer affordability.

b. To what extent will these products improve health and sustainability?

On health aspects:

Increasing the fruit content of jams and extra jams can help consumers get more nutrients and contribute to a healthier diet. Increasing the fruit content reduces the need for added sugar. This can be beneficial for those individuals who wish to limit their sugar intake. Increasing the amount of fruit in jams and extra jams allows people to consume a wider variety of fruit, contributing to a more varied and nutritious diet.

On sustainability aspects:

Increasing the fruit content can increase the demand for fruit, which can support local and sustainable agricultural production. Using more fruit in jams and extra jams can reduce food waste. Using more fruit in jams allows the use of surplus or fruits that do not conform to marketable appearance that might otherwise become food waste.

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

They can be used as synonyms, but it is important to ensure that consumers are not misled.

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

The increased requirement for fruit content in jams and extra jams is likely to have an impact on the price to the consumer. The use of higher fruit content in jams and extra jams will increase the demand for fruit. If the purchase price of fruit increases due to increased demand, this may lead to higher raw material costs for producers. This in turn may contribute to an increase in the price of the final product. The actual price impact will depend on a variety of factors, including availability and price of fruit, economies of scale in production, marketing strategies and overall market dynamics.

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)?

We agree with authorising a treatment to produce lactose free dehydrated milk.

Lithuania's Position for Working party on Breakfast Directives 12th June 2023

The Lithuanian delegation thanks the Commission for the amending proposal of the “Breakfast directives”. We provide comments below.

Honey

LT is in favor of **option D** “indicate % of all countries”. It is crucial that transparency is established in the honey market. The consumer must clearly and unambiguously see from which countries they are purchasing honey. It is important to address issues related to honey adulteration, problems associated with traceability in the honey supply chain, enhance control measures, develop laboratory testing methods for honey, and harmonize such testing methods. In our opinion, there is no need to apply labeling exemptions for packages up to 25 g.

Fruit juices

LT would prefer the claim “no fruit juices contain added sugars”.

Jam and marmalades

When it comes to the fruit content in both jam categories, we believe it is beneficial to accept the proposal of 450 grams of fruit per kilo for regular jam and 550 grams of fruit per kilo for extra jam (**option D**). This approach would not only improve primary production but also align with the strategy for promoting healthier food options and reducing food waste. A higher quantity of fruit is likely to increase the price for the end consumer.

We also have a question regarding products in which the fruit content is lower than specified in the directive. Such products cannot be called “jams”. How should they be named instead?

Milk

No comments. LT supports the proposal.
