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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 Czech delegation

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

Czech answers in preparation for the meeting on 26 May to the 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

We thank the Presidency for its efforts and the questions submitted for clarification and would like to submit the following answers

Honey

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

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

- We believe that the proposed change may help to reduce the risk of misleading consumers when labelling honey blends with the country of origin. By requiring the percentage of each type of honey in the blend, consumers will be better informed about the composition of the product and its origin. This could lead to greater transparency and consumer confidence in honey labelling.

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 change could cause some administrative burden for honey blenders and honey packers as they will have to modify their labels. However, in terms of the impact on the price for consumers, we anticipate that this effect could be minimal. The changes in labelling and analysis costs should be relatively small compared to the overall costs of honey production and distribution.

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 Czech Republic does not support the introduction of honey percentages in honey blends, as we assume that it would be very difficult for the control authorities to check the representation of the different percentages in the blend. Although laboratory methods already exist for analysing the composition of honey and checking its quality and authenticity, we consider it impossible to quantitatively verify the individual honeys and their percentages. Effective supervision would require sufficient resources and training for the inspection bodies to be able to carry out such analyses and verify compliance with the requirements of the directive. We therefore believe that this would be more of an administrative check, which would only place an additional burden on the control authorities.

Fruit juices

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

- We are not against, however there might occur some negative side effects such as reduction of organoleptic properties of fruit juices.
- Every customer can reduce the intake of sugar by many ways, in this context for example by adding water into the fruit juice (himself at home). This seems to be the easiest (and cheapest) way how to reduce the sugar content in fruit juices without any additional treatment.

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

- We suppose that this kind of treatment may lead to the reduction of organoleptic properties of fruit juices (i.e. by fermentation can arise a small amount of alcohol). There is also a high risk, that the producers will stop producing and sell “classic” fruit juices (or at least the offer of such products will be lower).
- We would like to ask the Commission to clarify the two above-mentioned processes in more detail and provide some scientific data.

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

- This statement might be incomprehensible for average customer.

Jam and marmalades

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

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

- We are not against, however there might occur some negative side effects such as: The changing recipes will change the current technological processes – generally, there is risk of using more additives to the products (i.e., preservatives, thickeners, colors) and there also might be increasing energy demand for production (longer time for “cooking”). Finally, there might be some change of organoleptic properties. The discussion with producers (small and large one) seems to be necessary.

To what extent will these products improve health and sustainability?

- In the general context of human life and diet, these benefits will be very low and questionable. As already mentioned, there also might be increasing energy demand for production.

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

- Yes. In the Czech Republic marmalades used to synonym for jams for a long time and most average consumers do not know the difference between these products.

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

- Probably yes due to higher price of fruit than sugar, also labelling change will cost some additional money. As already mentioned, there also might be increasing energy demand for production.

Milk products

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

- Yes, we welcome this change and agree with the proposal for produce lactose free dehydrated milk.

General comment: As some other MS already mentioned, CZ would prefer to use regulations instead of directives as it is simpler way for application of the new rules.