



Council of the European Union
General Secretariat

**Interinstitutional files:
2018/0218(COD)**

Brussels, 05 November 2019

WK 10483/2019 ADD 11

LIMITE

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WORKING PAPER

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Delegations
N° prev. doc.:	7451/1/19 REV 1 + COR 1
N° Cion doc.:	9556/18 + REV 1 (en, de, fr) + COR 1
Subject:	Regulation on common market organisation (CMO) of agricultural products - Swedish comments

Further to the meeting of the Working Party on Agricultural Products on 25 October 2019, delegations will find attached the comments from the Swedish delegation.



5 November 2019

Ministry of Enterprise and Innovation

Swedish comments regarding the CMO regarding wine labelling; mandatory list of ingredients, which may be provided in electronic form, and nutrition labelling which may be limited to the energy value only.

Sweden would like to thank the Finnish presidency for the opportunity to send in written comments.

Sweden would like to submit the following comments.

As stated previously, Sweden opposes the setting out of specific provisions on nutrition declaration and list of ingredients only for wine. This issue should be settled horizontally in the framework of the process based in Regulation (EU) No 1169/2011.

Regarding nutrition labelling, Sweden would prefer that, *if* this is regulated in Article 119 of (EC) no 1308/2013;

- the labelling should be done according to (EC) no 1169/2011, kcal per 100 g. We do not want any references to calories per serving. Serving size for wine is not regulated and the size of a serving differ a lot between Member States. The calories should be measured according to factual content and not average values.

Regarding the list of ingredients, Sweden would prefer that, *if* this can be provided in electronic form in Article 119 of (EC) no 1308/2013;

- the mention of **allergens** as provided for in Article 21 in (EC) no 1169/2011 and Article 41 in (EC) no 2019/34 shall continue to be

mentioned on the label. The possibility to solely include the allergens in the list of ingredients should not apply, for lists of ingredients that are provided electronically.

- the list of ingredients should not be provided as a form of standard ingredients that normally can be found in wine.

Due concerns to questions regarding conditions on presentation are reflected in Article 119 of (EC) no 1308/2013, namely regarding;

- Safeguarding the link between the specific product and the electronically provided list of ingredients and safeguarding the link in time.
- Safeguarding that people looking for the electronically provided link on the internet are not registered.
- Safeguarding that the list of ingredients is provided directly and without additional information aimed for marketing.
- Safeguarding measures for control.

The delegated powers given to the Commission should specify the conditions regarding the delegation in more detail.