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General Secretariat

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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<br>- Cyprus comments |

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



REPUBLIC OF CYPRUS  
MINISTRY OF AGRICULTURE,  
RURAL DEVELOPMENT  
AND ENVIRONMENT



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1<sup>st</sup> November 2019

To the General Secretariat  
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Dear General Secretariat

**Subject: Working Party on Agricultural Products-25/10/19-Cyprus Comments on Amending Regulation (CMO) 7451/1/19 REV 1 + COR 1**

Following the comprehensive work undertaken during the above mentioned working party meeting, Cyprus wishes to continue its contribution with further written comments on wine labelling (article 119 and 122) and checks and penalties, on the subject under discussion (Article 90a).

Concerning articles 119 and 122, Cyprus stresses the importance of the EU law provisions in the horizontal Regulation (EU) no. 1169/2011 [particularly articles 1(4), 16(4), 9(1), 31, 32 and annexes XIV and XV), which apply without prejudice to other Union provisions, to the required nutrient declaration and a mandatory list of ingredients.

Therefore, Cyprus believes that the current wording suggested in the CMO Amending Regulation, providing for the energy value (on label) and a list of ingredients (off label) to be mandatory, is fully compatible with Regulation (EU) 1169/2011. Taking into account the aforesaid, Cyprus believes that no specific provisions are needed concerning the energy value declaration in article 119.

However, Cyprus puts forward the need of a Commission delegate and implementing acts according article 122, in order to supplement comprehensively and properly the subject of

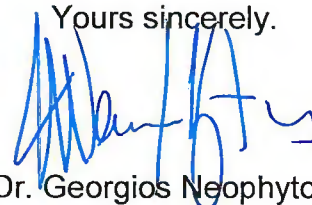
listing the wine ingredients with valuable information to the consumers, while avoiding intended information for sales and marketing purposes.

Moreover, the Commission supplementary acts should take into consideration-by means of a provisional exemption-the particular state of play and the additional financial burden on micro-sized wine enterprises of Cyprus, and eventually of other Member States with similar organizational characteristics.

Lastly, concerning the provisions proposed in article 19(a), Cyprus believes necessary to take such measures in order to ensure that products which are not labelled in conformity with this Amending Regulation are not placed on the market.

For the time being, Cyprus is not against the proposed re-labelling suggestions of minor non-conformed labeled products without withdrawing them from the market, but this idea needs further reflection and careful rewording in the forthcoming period of examination.

Yours sincerely.



(Dr. Georgios Neophytou)  
for Director

cc.: -Permanent Secretary  
Ministry of Agriculture, Rural Development and Environment

-Permanent Representative of Cyprus  
To the European Union