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WORKING PAPER

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CONTRIBUTION

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| From: | General Secretariat of the Council |
| To: | Delegations |
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| Subject: | Regulation on common market organisation (CMO) of agricultural products - Slovenian comments |

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



Ljubljana, 1 November 2019

COMMENTS FROM SLOVENIAN AUTHORITIES
on Working Paper WK 11450/2019 INIT
and Articles 119, 122 and 90a of the proposal of the CMO »Amending Regulation«
(ST 9556/1/18 REV)

To the Council Secretariat: LIFE1A@consilium.europa.eu

Slovenia is sending the written contribution following the meeting of the Working Party on Agricultural Products at the Council of European Union on 25 October 2019.

We support the text of amended Article 119 (compulsory particulars on wine labelling), Article 122 (delegated powers for the Commission) and Article 90a (checks and penalties, re-labelling) that was presented at the meeting on 25 October 2019.

We agree that provisions on wine labelling are a part of CMO Regulation (1308/2013) rather than included in horizontal FIC Regulation (1169/2011).

We agree that the list of ingredients may be provided in electronic form as off-label information, however, necessary steps would have to be taken to ensure consumer anonymity to avoid potential targeted advertising which such a process could entail.

Despite of possible off-label list of ingredients we support the mandatory labelling of allergens (sulfites, milk and egg proteins) on the label (on the bottle).

We agree on the amended paragraph 1 of Article 122 about the delegated powers for the Commission regarding conditions for the presentation and use of the nutrition declaration and the list of ingredients. In the delegated act if prepared later on we would also like to obtain more precise information how the energy value (as a compulsory element of the nutrition declaration) shall be determined (e.g. whether calculated from alcohol content or also from residual sugar in wine etc.).

We support the *status quo* situation (as in 1306/2013) regarding the provisions in new Article 90a (checks and penalties).