



AIJN POSITION PAPER REGARDING ORIGIN LABELLING

February 2010

The European Fruit Juice Association (AIJN) has been representing the manufacturers of fruit and vegetable juices, nectars and other juice-based products in Europe since 1958.

We are writing to you regarding the issue of mandatory labeling of the country of origin of the ingredients for processed products, which is currently being discussed in several policy contexts (Proposal for the Regulation on provision of food information to consumers, Commission Communication on agricultural product quality policy, Marketing standards, etc.).

As the representative organization of fruit juice industries, our association strongly opposes any compulsory labeling of origin for processed products. Fruits are by their very nature products that undergo fluctuations, and their availability and supply depend on various aspects:

- **Climate** and extreme weather changes which effect the increase of crop failures
- **Quality** which is highly dependable on geographical area, season conditions, outbreak of diseases, etc.
- **Prices** due to international market speculation, information exchange, currency volatility, as well as rising costs of energy, steel and sea freight.

Therefore in order to maintain product consistency, supply sources and juice blends are frequently changed. This is why juices are sourced from a variety of countries all around the globe.

It would thus be extremely difficult to specify country of origin for fruit juices on a compulsory basis. Obliging companies to change their labels whenever their raw material supply sources change would result in costly re-labelling and some of these costs would have to be passed on to the consumer.

Furthermore, stating the origin of juices would not necessarily inform consumers of what they might wish to know. Listing the origin of fruits used in juices would not provide consumers with essential information in order to make their purchasing choices. Naming a country is not necessarily confirmation of any particular quality. All food products placed on the EU market are safe and comply with the applicable EU legislation, and linkage between the concepts of food safety with that of origin would be misleading for consumers. This labeling obligation would rather result in over-crowded labels which

would complicate the perception of the most relevant information for the consumer (i.e. product name, ingredients, durability date, nutritional content).

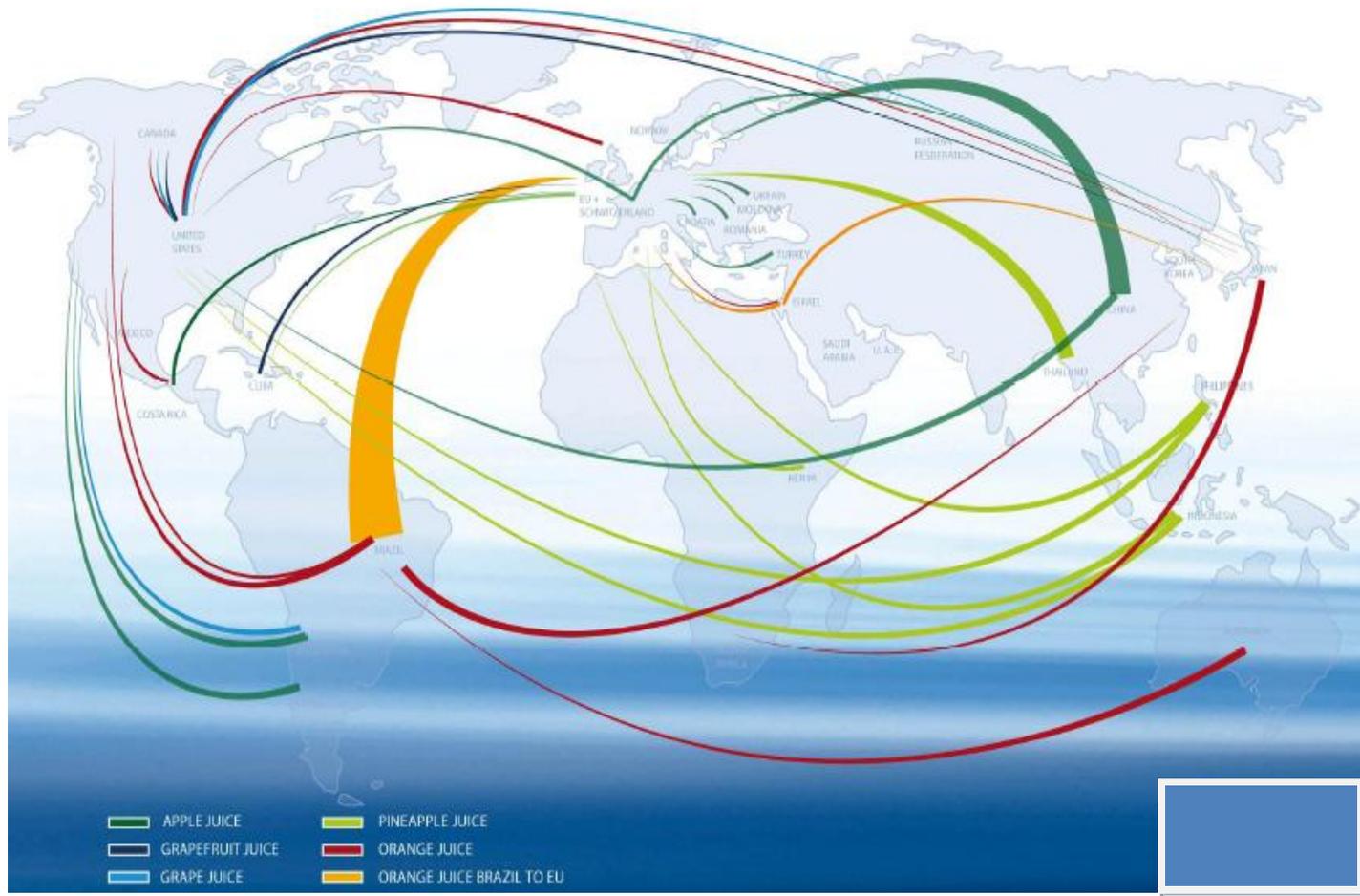
Mandatory origin labeling would therefore likely lead to disproportionate administrative costs and burden while not providing real consumer benefit. In our opinion, off-label information (e.g. through websites) would be a far more helpful way of providing information.

The European fruit juice industry believes that origin labeling requirements have to be decided on a product by product basis and should in no case be mandatory for all processed agricultural products across the board. We support thus the current provisions on origin labeling (as stipulated in the article 3.8 of the Directive 2000/13/EC) and strongly oppose introduction of any additional binding provisions.

In Annexes to this letter you will find an overview of the flow of raw materials for fruit juices, as well as examples of products typical for our sector and explanation of practical barriers to mandatory origin labeling of such products.

ANNEX I

Graphic view of global flow of raw materials for fruit juices



ANNEX II

Examples of raw material sourcing for fruit juices

1. Apple juice

- Average quantity of production in Germany of the past 5 years: 1 billion litres, thereof approx. 500 million litres locally produced
- Minimum quality requirements are regulated by law
- Acidity is an essential aspect in order to meet the taste expected by the consumers. Acid content of the apples varies depending on growing area (e. g. Italy low acid content, Poland high acid content) as well as on variety, weather conditions, point of harvest etc.
- Apple trees are subject to alternation, i.e. low crop - high crop - low crop etc.

Conclusion: Harvest fluctuations, differences in quality and availability require a blending of different apple juices in order to ensure constant consumer quality. The official statistics show that apple juice concentrate which is used for the production of apple juice originates from 15 EU member states and 13 other countries on different continents (figures 2008).

2. Multivitamin fruit juices

- Multivitamin juices come third in the per-capita-consumption of fruit juices after apple juice and orange juice. It is a combination of several different fruit juices.
- The following table shows different kinds of fruit usually used and freely combined in multivitamin juices, as well as their origin:

Fruit	Origin
Pineapple	Costa Rica, Thailand, Brazil, Philippines, Indonesia, Mexico, India
Apple	Germany, several EU countries, several other countries
Apricot	Spain, Italy, France, Israel, California, Greece

Banana	Brazil, India, Thailand, Philippines, Ecuador, Costa Rica
Pear	France, Italy, Belgium, Netherlands, Austria, Germany, Chile, Argentina, South Africa, USA, China
Guava	Mexico, Brazil, India, South Africa, Malaysia, Egypt
Litchi	South Africa, India, Thailand, Mexico, China, Israel
Nectarine	Italy, France, Spain, Greece, California, Chile, South Africa
Orange	Brazil, Florida, Spain, Israel, Greece, South Africa
Papaya	Mexico, Brazil, India, South Africa, Kenya
Peach	Italy, France, Spain, Greece, USA, South America, Australia, South Africa
Grape	Italy, Greece, Spain, South Africa, Chile, Argentina, France
Umbu	Brazil
Lemon	Mediterranean area, Argentina, Brazil, South Africa