



Government Offices of Sweden



**Ministry of Food, Agriculture
and Fisheries of Denmark**



Ministry of Agriculture and Forestry of Finland

20 December 2024

Dear Director-General, Burtscher,

First of all, we would like to thank you for the work you have put into the draft Delegated Act for a marketing standard for cider and perry (as discussed in the CMO Expert group meeting on the 5th of December 2024).

Unfortunately, a marketing standard for cider and perry, as currently proposed, could potentially limit innovation and decrease product development, and be detrimental to established products on the market of substantial value.

“Craft ciders” have high content of juice. Industrial ciders have a lower juice content. They belong to different market segments. Industrial ciders are not restricting the market of craft ciders. We see no reason why the two types of cider cannot continue to coexist. However, if a marketing standard is to be established, it should be sufficiently broad and inclusive, and differ between different quality segments in the product category. According to Nordic standards, cider is a beverage of fermented fruit juice made of apple and/or pear, where all alcohol is originated from its own fermentation, and with at least 15 percent by volume fruit juice. You are allowed to add approved additives, aromas, non-fermented fruit juice, water, and sugar.

A marketing standard, especially as proposed in the draft, would have significant economic implications, and affect European companies negatively. We see no need to introduce additional marketing standards. The proposed marketing standard for cider and perry will have a substantial negative economic impact.

Even though cider is still predominantly consumed in Europe, a large amount is also being exported to third countries. There is a clear ambition for the Nordic cider producers to continue to reach new markets outside the EU and the consumer demand is increasing. As an example, approximately 100 million litres of Swedish ciders, or 75 per cent of the Swedish production, is exported to other markets annually, accounting for more than one third of the EU's export of cider. The cider production is important for the Swedish economy, and more specifically for the Swedish beverage industry. 94 percent of the total volume in the Cider category sold by the stately owned monopoly in Sweden is Nordic Cider.

Danish exports of cider are rising. In 2020 the exported volume was 17 million litres and in 2023 it was 27 million litres. The industry's preliminary assessment is that exports amount to approximately DKK 500 million and that the proposal is expected to have significant economic consequences for the Danish economy.

Finland produces approximately 22 million litres of cider which is mainly consumed nationally.

To avoid serious negative consequences for Nordic producers, a marketing standard should be sufficiently broad and inclusive, and differ between different quality segments in the product category.

As it is challenging to regulate this highly diverse product category, where different countries have different approaches to what constitutes "cider", the objective of high-lighting quality aspects could also be achieved in other ways, e.g., through the Regulation on Geographical Indications or by Optional Reserved Terms. Such terms can direct consumers towards products of higher quality, while maintaining existing national legislation.

It's through innovation, new products, and communication that the beverage sector can grow – especially on export markets. Instead of contributing to growth, a marketing standard for cider, as it is proposed now, is more likely to have the opposite effect.

We want to be a constructive force in order to find a suitable way forward where a diverse production of cider across Europe can remain, while harmonising rules for traditional cider production. We hope that obstacles for cider production arisen by this proposal will be taken into account and

that the Commission will take the necessary action to avoid the negative economic impact that the proposal is expected to have for Sweden, Denmark and Finland.

We remain at your disposal for further discussions and will be happy to contribute with additional information that might be required.

Yours Sincerely,

Dan Ericsson, State Secretary, Ministry of Rural Affairs and Infrastructure,
Sweden

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Agriculture and Forestry, Finland

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