



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate F – Outreach, Research & Geographical Indications  
The Director

Brussels  
AGRI.F.3 [REDACTED]

**Subject: Your request for cancellation of the protected designation of origin (PDO) “Χαλλούμι” (Halloumi)/Hellim”**

Dear Madam,

I refer to your email of 30 December 2024 to Mr Selearis, of the Ministry of Agriculture of the Republic of Cyprus, requesting the cancellation of the protected designation of origin (PDO) “Χαλλούμι” (Halloumi)/Hellim”.

You have argued that you, as representative of the legal person ‘Normmejerier Ekonomisk Förening, Sweden’, are eligible to submit a request of cancellation directly to the authorities of a Member State different from the one where the legal person is resident or established on the basis of an interpretation of Article 25 of Regulation (EU) 2024/1143 we gave by letter of 23 July 2024, in which we had replied positively to the question whether a request for cancellation is to be addressed to the competent authorities of the Member State in which the product designated by the geographical indication to be cancelled originates.

There was indeed a misunderstanding. That letter of 23 July 2024 was sent on the assumption that the natural or legal person requesting the cancellation is resident or established in the Member State from which the product designated by the geographical indication to be cancelled originates. In fact, if the geographical indication for which a cancellation is sought designates a product that is produced in a Member State different from the one where the natural or legal person making the request is resident or established, the natural or legal person is obliged to submit its request to the authority of the Member State where this natural or legal person is resident or established.

This has already been clarified in our previous letter of 24 June 2024 (ARES(2024)4542983) in which we had wrote that ‘[n]atural or legal persons having a legitimate interest and established or resident in a Member State are not excluded but shall address the cancellation request to the authorities of that Member State. This is in accordance with Article 10 of the above-mentioned Regulation that, as indicated in Article 25(4), shall apply *mutatis mutandis* to the cancellation procedure.’

The cancellation procedure follows the structure of the registration procedure *mutatis mutandis* (Article 25(4) of Regulation (EU) 2024/1143).

[REDACTED]

CC: [REDACTED]

Therefore, it is divided into two stages: the national stage and the Union stage. At the national stage of the registration procedure, and of the cancellation procedure, the authorities of a Member State receive the applications, or the requests of cancellation, from producer groups for registrations, or from natural or legal persons having a legitimate interest concerning cancellations, established in the territory of that Member State. This reflects the principle of two stages of the procedure (national and Union) and of the division of tasks between the Commission and the Member States. The whole system of the EU geographical indications is based on that principle. Therefore, the same applies to the cancellation procedure.

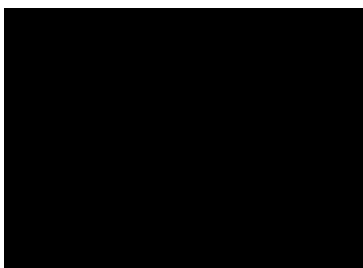
This interpretation is confirmed by the circumstance that Article 25(1) of Regulation (EU) 2024/1143, which identifies the scope of the requests of cancellation to be submitted to the Commission, refers to ‘any’ Member State and not only ‘the’ Member State in which the geographical area of the geographical indication to be cancelled is located. Therefore, Sweden, after carrying out the national stage of the cancellation procedure, may submit to the Commission a request of cancellation of the protected designation of origin (PDO) “Χαλλούμι’ (Halloumi)/Hellim”.

To summarise, a natural or legal person, having legitimate interest, resident or established in Sweden may not submit a request of cancellation of the protected designation of origin (PDO) “Χαλλούμι’ (Halloumi)/Hellim” directly to the Cyprus authorities but must submit it to the Swedish authorities. The Swedish authorities have the obligation to examine such a request on the basis of the requirements of Regulation (EU) 2024/1143 and its secondary legislation in view of possibly submitting such a request to the Commission.

In case the request fulfils the requirements for a request of cancellation under Articles 25(1) of Regulation (EU) 2024/1143 and 14(1) and (2) of Regulation (EU) 2025/26, the Swedish authorities shall publish it, thus opening the national opposition procedure. At the end of the national opposition procedure, they would decide whether to submit the request of cancellation to the Commission under Article 25(1) of Regulation (EU) 2024/1143.

The present opinion is provided based on the facts as set out in your email and expresses the view of the Commission services and does not commit the European Commission. In the event of a dispute involving European Union law, it is for the Court of Justice of the European Union to provide a definitive interpretation of the applicable European Union law.

Yours sincerely,



Diego CANGA FANO