



EUROPÄISCHE KOMMISSION
GENERALDIREKTION LANDWIRTSCHAFT UND LÄNDLICHE ENTWICKLUNG

Direktion F – Kontaktarbeit, Forschung und geografische Angaben
Der Direktor

Brüssel
AGRI.F.3/

Subject: Controls and link to the product specification in the single document

Sehr geehrter Herr Dr [REDACTED],

Thank you for your message of 23 January 2025 (our ref. *Ares(2025)2298644*) on the link to the product specification in the single document.

As regards wine, checks to verify compliance with the product specification for designations of origin and geographical indications are done in accordance with Article 116a of Regulation (EU) No 1308/2013, complemented by Implementing Regulation (EU) 2019/34, notably its Articles 15 and 19. These checks always refer to the product specification, not the single document.

Therefore, the Austrian competent authorities performing the verification of compliance pursuant to Article 116a can indeed rely on labelling conditions contained in the product specification of ‘Wachau’ to impose that a producer complies with these conditions. As regards your question on sanctions, in application of Article 19(6) Regulation (EU) 2019/34, any product failing to meet the conditions set out in paragraphs 1 to 5 may be placed on the market, but without the relevant designation of origin or geographical indication, provided that the other legal requirements are satisfied.

On the other hand, for wine, in line with Article 95(1) of Regulation (EU) No 1308/2013, *“The single document shall include the following: [...] (k) where applicable, the specific rules concerning packaging and labelling as well as any other essential relevant requirements.”*

The single document published in the Official Journal (OJ) is a legally binding summary of the key elements of the PDO/PGI detailed in the product specification, including the above-mentioned elements, and it should also be self-standing. The single document serves as a reference in the Union and is the basis for verification of the use of GIs in the market pursuant to Article 42 of Regulation (EU) 2024/1143. Consequently, if the single document does not include any reference to labelling conditions, verification by competent authorities after the product has been placed on the market may not take such conditions into consideration, even though they appear in the product specification and there is a link at the end of the single document to the product specification which enables direct access to it.

You explain that the latest product specification of ‘Wachau’ contains the obligation that the name of the PDO ‘Wachau’ must be used on the label in combination with the traditional

[REDACTED]
Federal Ministry of Agriculture, Forestry, Regions and Water Management
Directorate-General II - Agriculture and Rural Development
Stubenring 12
1010 Vienna, Austria
Email: [REDACTED]@bml.gv.at

expression „DAC“ or „Districtus Austriae Controllatus“, but this labelling condition is not reproduced in the single document.

Should you wish to ensure that the labelling condition is taken into account by competent authorities verifying use after the product has been placed on the market, you could request a corrigendum of the single document for 'Wachau'. It is not a standard amendment modifying the single document, since as you explain the labelling condition is already in the product specification and therefore the change would not be an amendment of the product specification.

The present opinion is provided based on the facts as set out in your email message of 23 January 2025 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.

Mit freundlichen Grüßen,



Diego CANGA FANO