



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT
Directorate F – Outreach, Research & Geographical Indications
The Director

Brussels
AGRI.F.3/

Subject: Interpretation of Article 37(5) of Regulation (EU) 2024/1143: obligation to add the address to the indication of the producer

Dear Ms ,

Thank you for your e-mail of 21 May 2025 in which you ask a question of interpretation of Article 37(5) of Regulation (EU) 2024/1143 ⁽¹⁾ with reference to the obligation to add the address of the producer on the labels of products designated as protected designation of origin (PDO) or protected geographical indication (PGI), and in particular whether it is better to indicate the address of the production site or the main address of the registered company responsible of the production.

Article 37(5) provides for an obligation to add the name of the producer on labels of products designated as PDO or PGI but does not provide for any obligation to add the address of the producer. Therefore, it is a free choice whether adding or not the address of a PDO or PGI producer and, if so, whether it has to be the address of the production site or the official main address of the company.

You have also requested which operator is responsible for the substantial part of the processing product in case the name of the operator is indicated instead of the name of the producer.

As a basis, the difference between a ‘producer’ and an ‘operator’ is that the producer performs production activities (i.e. bottling is excluded, a ‘bottler’ is not a ‘producer’) while the ‘operator’, as per definition in Article 2(1)(e) of Regulation (EU) 2024/1143, is any natural or legal person performing an activity covered by the product specification (i.e. ‘bottling’ included, if applicable).

⁽¹⁾ <http://data.europa.eu/eli/reg/2024/1143/oj>

Ministry of Agriculture of the Czech Republic
Department of Foodstuffs
Prague 1
[@mze.gov.cz](mailto:)

[@mze.gov.cz](mailto:)>

In the case of Article 37(5), the Regulation uses the term ‘operator’ specifying that it means something different from the definition in Article 2(1)(e). The second sentence of Article 37(5) clarifies that the meaning of ‘operator’ in this particular situation is specific and it is not to be referred to the definition in Article 2(1)(e) of the Regulation. Therefore, ‘operator’ is the person or company responsible for the production stage at which the product is obtained, or the person or company responsible for carrying out the substantial processing

of that product. This rule has the practical objective of simplifying the implementation of the obligation in case of multiple producers or in case of difficulties in identifying them.

For example, a packager of grated ‘Parmigiano Reggiano’, who grates and blends the product coming from different PDO producers, is allowed to include its name in the label as ‘operator’ (within the meaning of Article 37(5) of the Regulation) instead of being obliged to list all the names of the ‘Parmigiano Reggiano’ producers providing the non-grated products.

A case-by-case assessment is necessary to identify the operator responsible for the substantial part of the processing.

The above information is based solely on the facts set out in your e-mail of 21 May 2025 expresses the view of the Commission services and does not commit the European Commission. In the event of a dispute involving Union law it is, under the Treaty on the Functioning of the European Union, ultimately for the Court of Justice of the European Union to provide a definitive interpretation of the applicable Union law.

Yours sincerely,



Diego CANGA FANO

Contact:

