



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate F – Outreach, Research & Geographical Indications  
The Director

Brussels  
AGRI.F.3 [REDACTED]

Dear [REDACTED],

Thank you for your email of 8 April 2025, in which you inquired about the provisions of the secondary legislation for geographical indications and the attestation of compliance.

Firstly, you referred to Article 17(2) of Commission Implementing Regulation (EU) 2025/26, which states that the attestation or the list shall contain “*the business of the operator, being ‘production’, ‘processing’, ‘bottling (packaging)’, and/or ‘other’*”. Regarding this provision, you noted that it seems there is no definition of these businesses in the Regulation.

The Commission services can confirm your understanding – the terms ‘*production*’, ‘*processing*’, and ‘*bottling (packaging)*’ are not explicitly defined in Regulation (EU) 2025/26. However, Regulation (EU) 2024/1143 on geographical indications for wine, spirit drinks and agricultural products, which is the basic act on which the Commission Implementing Regulation (EU) 2025/26 is based, defines the ‘production step’ and the ‘processed product’ in Article 2(1), points (d) and (f), respectively.

In light of the above, ‘production step’ is *any stage of production, including raw materials, or of processing, preparation or ageing, up to the point where the product is ready to be placed on the market.*

‘Processing’ is defined indirectly by the reference that the definition of ‘processed product’, in Article 2(1), point (f), of Regulation (EU) 2024/1143, makes to Article 2(1), point (o), of Regulation (EC) No 852/2004, and which is *any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes.* It should be noted that ‘processing’ is in any event considered a production step in the framework of the EU legislation on geographical indications.

[REDACTED]  
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'Bottling and packaging' are neither directly nor indirectly defined. However, the definition of Article 2(1), point (k), of Regulation (EC) No 852/2004 should apply. Therefore, it is not limited to wine and can indeed cover other products. In the case of cheese, it would include *cutting, wrapping, or packaging the cheese* for sale, provided that these operations are covered by the product specification.

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 faithfully,

A black rectangular redaction box covering the signature of Diego CANGA FANO.

Diego CANGA FANO