



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

Brussels  
AGRI.F.3/ [REDACTED]

**Subject: Consultation on amendment to the product specification – PDO cheeses**

Dear Madam,

Thank you for your message of 24 October 2024 (our ref.: Ares (2024)7598004) regarding the amendment to the product specification for a PDO cheese.

1. You have inquired whether certain modifications can be considered a standard amendment.

You propose to modify the product specification of a PDO cheese to regulate aspects of extensiveness of production and feeding in the geographical area, which in your view, would not void the link with the geographical area. If that is the case, this kind of modification can be considered a standard amendment. It is important to note that the final decision on whether an amendment is a Union or standard one lies with the Member State, which must take responsibility of the assessment.

2. You have proposed regulating the production by implementing two levels of different parameters (more demanding and less demanding) and requiring at least half of the parameters to be at the highest level.

While this approach may not be forbidden, we would like to caution that it may be complex to control. We advise you to consider simpler solutions that are easier to monitor.

3. You have proposed to regulate a sustainability requirement to reduce carbon footprint by requiring feed to come from the Union, in addition to a percentage from the geographical area.

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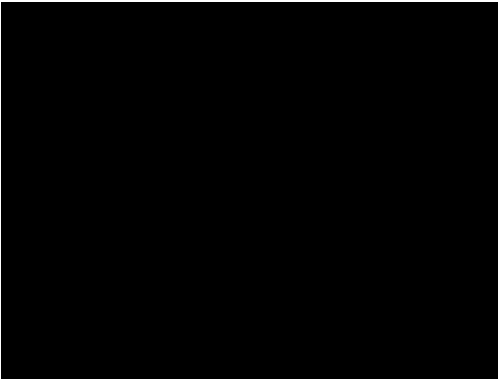
On this proposal, we must refer to Article 47 of Regulation (EU) No 2024/1143, which states that feed for PDO products of animal origin must be sourced entirely from the geographical area, with exceptions allowing up to 50% of dry matter to be sourced from outside the area if sourcing entirely from within is not practicable.

4. Finally, you have inquired about the possibility of granting a transitional period for farmers to adapt to the new specification.

Article 20(6) of Regulation (EU) No 2024/1143 only applies to applications for registration and Union amendments. However, if you wish to adopt a standard amendment and simultaneously grant a transitional period, this would be possible, as a measure taken at national level, under your exclusive responsibility. The transitional period linked to a standard amendment should be inspired by the principles of Article 20(6) of Regulation (EU) No 2024/1143.

The present opinion is provided based on the facts as set out in your message of 24 October 2024 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

c.c.:

