



In particular, Article 37(7) reads: *Indications and abbreviations may be used in the labelling and advertising material of processed products when the geographical indication refers to an ingredient thereof. In that case, the indication or abbreviation shall be placed next to the name of the ingredient that is clearly identified as an ingredient. The Union symbol shall not be placed in association with the name of the food within the meaning of Article 17 of Regulation (EU) No 1169/2011.* (emphasis added)

In light of this wording, the Union symbol cannot be placed in association with the name of the product prepared using a product designated by a geographical indication as ingredient. This prohibition is explicit in the last sentence of this paragraph and is in clear contrast with the non-binding recommendation included in the Guidelines of 2010.

In addition, the first sentence indicates (explicit list) the elements that the producers are allowed to use on the labelling of processed products (products prepared using a product designated by a geographical indication as an ingredient) and the exact place where these elements must be placed. The allowed elements are: 1) the indications (*protected designation of origin* or *protected geographical indications*) and 2) the abbreviations (*PDO* or *PGI*). They must be placed next to the name of the PDO/PGI ingredient that is clearly identified as an ingredient. The Union symbol is not listed.

In light of the above, it is to be deduced that the use of the Union symbol is definitely not allowed on the label, either close to the name of the processed product or close to the name of the PDO/PGI ingredient.

This is in line with the stricter approach that the EU legislators have taken in general on the labelling of products that are prepared using a product designated by a geographical indication as an ingredient. During the debate in the Council, several Member States had explicitly argued that the Union symbol should be reserved only to products which are directly designated by a geographical indication and should not appear on labels of products which are prepared using a product designated by a geographical indication as an ingredient.

Therefore, insofar as it envisages that the producers of products prepared using the product designated by the PDO 'Mejillón de Galicia'/'Mexillón de Galicia' as an ingredient have the option to use the Union symbol on the label of their products, the product specification of the PDO 'Mejillón de Galicia'/'Mexillón de Galicia' is no longer in line with the current EU legislation (Regulation (EU) 2024/1143) and this part can no longer be implemented by operators producing processed products using PDO 'Mejillón de Galicia'/'Mexillón de Galicia' as an ingredient.

The above information is based solely on the facts set out in your e-mail of 24 March 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 faithfully,



Diego CANGA FANO