



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate F – Outreach, Research & Geographical Indications  
The Director

Brussels  
AGRI.F.3

**Subject : Request of interpretation of Article 27 and 37 of Regulation (EU) 2024/1143**

Dear Madam,

Thank you for your letter of 17 December 2024 requesting an interpretation of Regulation (EU) 2024/1143 of the European Parliament and of the Council, of 11 April 2024, on geographical indications for wine, spirit drinks and agricultural products, as well as traditional specialities guaranteed and optional quality terms for agricultural products, amending Regulations (EU) No 1308/2013, (EU) 2019/787 and (EU) 2019/1753 and repealing Regulation (EU) No 1151/2012 (therein after ‘the GI Regulation’).

You seek clarifications regarding the application of Articles 27 and 37 of the GI Regulation.

Article 27(1) applies to all types of food products. Therefore, the use of a geographical indication (GI) in the name or in the label of any processed food, of which the product designated by that GI is an ingredient, is allowed insofar as it complies with the criteria listed therein. However, no notification is required. A notification is required only for food products falling within the scope of Article 27(2), that is prepacked food using in its name a GI for which the Union register of geographical indications (hosted in the database ‘eAmbrosia’) indicates that a Recognised Producer Group exists.

The Guidelines on the labelling of foodstuffs using protected designations of origin (PDOs) or protected geographical indications (PGIs) as ingredients published in the Official Journal of the European Union 2010/C of 16 December 2010, were not mandatory before the adoption of the Regulation and are still not mandatory. As you correctly mention, they have been taken as a reference in the judgement of the Court of Justice of 9 September 2021 in case C-783/19, known as the ‘Champagner sorbet’ judgement. They have also been taken as a reference by the legislator when drafting the provision in Article 27(1) of the GI Regulation. They are still in force. However, insofar as part of their content has been replaced by the provisions of Article 27 of the GI Regulation, this part is now obsolete.

According to the GI Regulation, the Union symbol shall appear in the same field of vision (i.e. viewing point) as the GI name (Article 37(3)). It is sufficient that the Union symbol appears once on the packaging. However, the Union symbol of the Protected Designations of Origin or Protected Geographical Indications (PDO or PGI) is considered an essential information. In view of the objective of the GI Regulation, the PDO/PGI symbol must appear in a prominent place of the label.

[REDACTED] - European Dairy Association [REDACTED] D’Auderghem [REDACTED]

Therefore, if it is shown in the front label, it is sufficient that the Union symbol appears once. Appearing only in the back label does not satisfy the labelling requirements.

As regards the application of Article 37(5), it is the actual producer of the product that has to be mentioned on the label. Following the applicability of this provision (14 May 2026), the obligation to indicate the producer will prevail on the obligation not to disclose confidential business secret. The retail/brand name is normally different from the authentic producer of the product, therefore indicating the retail/brand name does not satisfy the required condition. However, if the brand name is identical to the producer's/operator's company name, the requirement is met.

Production facilities are not relevant. Mentioning the name of the person or company producing the product is enough.

In the case of aged products, where the ageing is the last production step of the GI, as provided in the product specification, the maturer may be considered a producer. This applies both to agricultural products and spirit drinks.

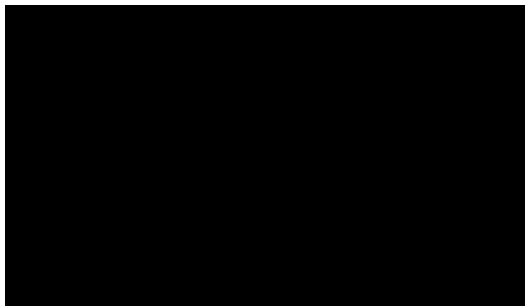
For agricultural products only, it is possible to replace the 'producer' with the 'operator', the 'operator' being the person or company responsible for carrying out substantial processing of the product. The definition of 'operator' in Article 2(1)(e) of the GI Regulation is not applicable in this case since the 'operator', as considered in Article 37(5), may perform processing (post-production) activity that is not necessarily included in the product specification. Consequently, for products like grated and blended cheese designated by a GI coming from multiple producers, and where the grating and blending is not part of the products specifications, the blender or grater may be mentioned on the label as 'operator'.

As regards cheese products marketed in pieces (to be sold individually), the authentic producer of each piece should be mentioned. It is not possible to indicate only the name of the operator who carries out the selection of products.

It is not mandatory to reproduce the name of the producer of the GI (for food and spirit drink sectors) or of the GI operator (for the food sector only) in the same field of vision of the registered GI name each time the GI name appears on the label. The name of the producer (or operator for agricultural products) of the GI should appear at least once on the label (in the same field of vision of the GI name). In addition, in view of the objectives of the Regulation, it is not mandatory either to have the name of the producer/operator in the front label. It may be mentioned only in the back label.

The present opinion is provided based on the facts as set out in your letter of 17 December 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 faithfully,



Diego CANGA FANO