



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

Brussels  
AGRI.F.3/TK

**Subject: Reply regarding clarifications on the protection of designations of origin and the labelling and presentation of wine products**

Dear Dr [REDACTED],

Thank you for your letter of 11 December 2024<sup>1</sup> in which you inquire clarifications relating to (a) the protection of designations of origin (PDO) and (b) the labelling and presentation of wine products.

You first ask whether a PDO whose demarcated geographical area neighbours another PDO's area can be expanded to cover and overlap with part of the latter's area. This may in principle be possible. The Union legislation foresees that the demarcated geographical area is delimited with regard to the causal link, which for a PDO constitutes the link between the quality or characteristics of the product and the relevant geographical environment referred to in Article 93(1), point (a)(i) of Regulation (EU) 1308/2013. Also, the demarcated geographical area should be defined in a precise way that present no ambiguities (Article 6 of Regulation (EU) 2025/26). If the producer group of the PDO wine 'Πιτσιλιά' wishes to expand the demarcated geographical area, this can be done either through a Union amendment if this change could potentially void the link or through a standard amendment if the change does not entail such a risk.

As regards your second question, as you correctly note, Union legislation regulates the use of terms referring to a wine-growing holding as laid down in Article 54(1) and Annex VI to Commission Delegated Regulation (EU) 2019/33. Annex VI to that Regulation includes the term "domain" for three Member States. The terms laid down in that Annex are reserved for grapevine products with protected designations of origin or geographical indications and shall only be used if the grapevine product is made exclusively from grapes harvested in vineyards exploited by the holding and the winemaking is entirely carried out on that holding. The indication of the holding on the label of a grapevine product is aimed at providing information to consumers as to the guarantee of specific quality linked to the product of the holding which stems from that indication. If a wine producing company seeks to register a trade name (i.e. the name to be used to refer to that company) which

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<sup>(1)</sup> Ares(2024)9125717 – 19/12/2024

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contains the term “domain” in order to produce wine in Cyprus, the company should choose one of the terms listed for Cyprus in Annex VI, which corresponds to the term “domain”. If the use of such term is in line with national and Union law and its registration as wine trademark does not prevent other holdings from using the term listed in Annex VI, the company could be allowed to use its name as an indication of the holding within the meaning of Article 54(1). In such a case, and while ensuring that the company does not use a term reserved for wines from another Member State, its wine should meet the conditions of that provision,

The above information is based solely on the facts set out in your letter of 11 December 2024, 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