



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

Brussels  
AGRI.F.3/

**Subject: Request of clarification (Article 27(1) of Regulation (EU) 2024/1143)**

Dear Madams, Dear Sirs,

Thank you for your letter of 21 July 2025 by which you have requested clarification about Article 27(1) of Regulation (EU) 2024/1143 <sup>(1)</sup>.

Article 27(1) provides for three conditions for the use of geographical indications (GIs) in the name, or in the labelling, or in the advertising material of processed products to which the product designated by the said GI is an ingredient. Concretely: 1) the processed product may not contain any product comparable to the product designated by the GI used in the name, labelling or advertising material of the processed product; 2) the ingredient designated by the GI must be used in sufficient quantity to confer essential characteristic on the processed product; 3) the percentage of the ingredient designated by the GI is to be indicated on the label.

For example, a product which is named ‘Pizza with Roquefort’ may not also contain generic blue cheese, must include sufficient quantity of “Roquefort” to confer an essential characteristic to the pizza and must indicate on label the percentage of “Roquefort” used.

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<sup>(1)</sup> 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; ELI: <http://data.europa.eu/eli/reg/2024/1143/oj>.

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You consider that these rules raise concern as regards their application in case of beers that use hops that are designated by GI as ingredient and that normally include the GI in their name, labelling or advertisement material. In particular you argue that the category of 'comparable product', which is relevant for the application of the first condition, does not include products of the same category.

As regards the first condition, 'comparable product' does, of course, include products of the same category of products. The reason for this rule is exactly to avoid that a processed product may pretend to use a GI product as an ingredient while in fact the part of the GI product used is minimal and a commodity of the same category is used in much bigger percentage. This would be an undue exploitation of the reputation of the GI. Therefore, if for example GI *'Hopfen aus der Hallertau'* (PGI) is used in the name, labelling or advertising of a beer, no other kind of hops may be added.

However, additional different hops products may also be used as ingredients together with *'Hopfen aus der Hallertau'*, and mentioned in the name, label or advertising of the beer, if they are also designated by a PDO or a PGI. As said, the aim of the provision is to avoid undue exploitation of GIs. Multiple GIs ingredient of the same category may be used, provided that they are all mentioned.

As regards the second and third conditions, the fact that the hops would be a spice does not constitute a problem. It means that a very small quantity of hops is used as an ingredient and a small percentage will have to be indicated on the label. Provided that the used quantity, as small as it can be, is sufficient to confer an essential characteristic to the final product and that the percentage is correctly indicated on the label the conditions will have to be considered as fulfilled.

Article 27(1) of Regulation (EU) 2024/1143 does not allow for any derogations. As stated in its paragraph 4, this Article is not applicable to spirit drinks. For the purpose of Regulation (EU) 2024/1143 beer is classified as agricultural product and therefore it is fully covered by Article 27.

The present opinion is provided based on the facts as set out in your letter of 21 July 2025 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

Contact:

