



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

Brussels
AGRI.F.3/ [REDACTED]

Subject: Interpretation of Articles 8(2) of Regulation (EU) 2025/26 and 2(4) of Regulation (EU) 2025/27 (applicability to procedures for the approval of a Union amendment)

Dear Ms [REDACTED]

Thank you for your e-mail of 30 May 2025 in which you ask a question of interpretation of Articles 8(2) of Regulation (EU) 2025/26 and 2(4) of Regulation (EU) 2025/27, concerning the obligation to carry out a national opposition procedure, in the context of an application for registration of a protected designation of origin (PDO) or protected geographical indication (PGI), when the Member States consider that the change to a product specification following an agreement in the EU opposition procedure is substantial. In particular, you asked whether these articles are also applicable to the procedures concerning the applications for approval of Union amendments.

In accordance with Article 24(6) of Regulation (EU) 2024/1143, the procedure for the approval of a Union amendment to the product specification of a PDO or PGI follows (*mutatis mutandis*) the procedure for the registration of a PDO or PGI.

Articles 8(2) of Regulation (EU) 2025/26 and 2(4) of Regulation (EU) 2025/27 are based on Articles 10 and 17 of Regulation (EU) 2024/1143. Article 24(6) refers explicitly to the applicability of Articles 10 and 17 to the procedure for the approval of a Union amendment.

Therefore, Articles 8(2) of Regulation (EU) 2025/26 and 2(4) of Regulation (EU) 2025/27 are to be interpreted as part of the system, in line with the nature and the scope of the provisions of Regulation (EU) 2024/1143 they are based on.

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In the light of the above, they are to be considered as applying to the procedures for approval of Union amendments.

The above information is based solely on the facts set out in your e-mail of 30 May 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 sincerely,



Diego CANGA FANO