



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate F – Outreach, Research & Geographical Indications
The Director

Brussels
AGRI.F.3/

Subject: Request of an interpretation of Article 37(5) of Regulation (EU) 2024/1143

Dear Madam,

Thank you for your letter of 3 June 2025 and the further information sent by mail of 25 June requesting clarification 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’) ⁽¹⁾.

You seek clarification regarding the application of Article 37(5) of the GI Regulation, in addition to the responses included in our letter of 3 February 2025 (Ares(2025)824598).

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

⁽¹⁾ 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, OJ L, 2024/1143, 23.4.2024, p.1.

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You asked whether this applies when the maturation period exceeds that specified in the product specification. You gave the example of Grana Padano (PDO), for which the product specification provides for a voluntary certification for longer maturation periods. The product specification of Grana Padano (PDO) provides for optional longer maturation periods beyond the minimum (e.g. "over 12 months", "over 14 months", "over 16 months", "over 18 months" as per the specification).

In the case you have given as an example the longer ageing period is optional but it is in any event covered and provided for by the product specification. Therefore, in the cases of the Grana Padano "over 12 months", "over 14 months", "over 16 months" or "over 18 months", all covered by the product specification, the maturer may be considered as a producer for the purposes of application of Article 37(5) of the GI Regulation.

As regards your second question, to reconsider the meaning of "substantial processing" with respect to slicing, cutting, and portioning of large-format GI cheeses, and to explicitly include such operations under Article 37(5), we would like to remind the following.

We had already clarified that 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. Please note that Article 37(5) of the GI Regulation defines how the name of the operator must be understood in the case regulated by that Article. This operator 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 product specifications, the blender or grater may be mentioned on the label as 'operator'.

However, as regards cheese products marketed in pieces (to be sold individually), the authentic producer of each piece must be mentioned. Contrary to grating and blending, slicing cutting and portioning are operations after which it is still possible to distinguish to which producer the product put on the market belongs. The marketed product does not change its nature after undergoing one of these operations.

Cases of very small portioning marketed collectively ('*apero*' style cheese) may be considered similar to grating and blending. But all other cutting, portioning and slicing may not, in particular if the product is then marketed individually and the authentic producer of the product may still be identified. We would like to remind you that the GI Regulation aims at giving visibility to the producers of products designated by GIs.

The present opinion is provided based on the facts as set out in your letter of 3 June 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,

A black rectangular box redacting the signature of Diego CANGA FANO.

Diego CANGA FANO

Contact:

