



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

Brussels
AGRI.F.3/OJM



Subject: Questions concerning wine labelling and the date of protection of wine GIs

Dear [REDACTED],

Thank you for your questions included in your emails of 28 August, 10 September and 10 October 2025. Some technical questions included in your queries were replied in our email of 10 October 2025.

For the remaining questions concerning wine labelling rules, we consolidate the replies below:

1. Is it possible to use the Union symbols in a different colour than specified in the regulation (yellow-red, yellow-blue or black-white), e.g. in gold or silver?

The Union symbols for Protected Designation of Origin (PDO) and Protected Geographical Indication (PGI) are established by Regulation (EU) 2024/1143 ⁽¹⁾ and the rules on their use are set out in Commission Implementing Regulation (EU) 2025/26 ⁽²⁾, in particular its Article 34 and its Annex XVII. The Union symbols for PDO/PGI should be reproduced exactly in the form, colour and shape as prescribed in this legislation.

The recognition of Union symbols among producers and consumers is rather low. Allowing changes to the form/colour/shape of the symbols would further negatively impact the symbols' visibility and recognition. In this regard, we reiterate that the use of PDO/PGI

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

⁽²⁾ ELI: http://data.europa.eu/eli/reg_impl/2025/26/oj

symbols in the wine sector is facultative, but once the producers decide to use the symbols, they should reproduce them as provided in the above-mentioned Annex XVII of Commission Implementing Regulation (EU) 2025/26.

2. Is it possible to include the Union symbol for PDO/PGI in a different colour on the front label, even if the name of the region is listed on the back label?

If the PDO/PGI symbols are used, they have always to be in the form and colours as provided in the Commission Implementing Regulation (EU) 2025/26, Annex XVII.

Where the Union symbols appear on the labelling of PDO/PGI wine, they shall be always accompanied by the registered name. This means that, if a wine producer decides to use the Union symbol, the symbol should be reproduced on the same label (in the same field of vision), where the PDO/PGI name appears. If a PDO/PGI name appears both on the front and back labels, the Union symbol can be put on either of the labels or on both labels, up to the producer's choice. However, since the symbol is considered to convey an essential information, it should always appear in a prominent place.

3. Historically, companies have registered various wine names as trademarks – mostly as figurative marks containing word elements, for example, Nitrianske knieža or Tibavské dievča. Today, these trademarks are still protected, but they are being used on wines without a geographical indication. This tradition dates back 30 years. Is it a legitimate practice?

Regulation (EU) 2024/1143 contains a rule allowing co-existence of trade marks and geographical indications, subject to certain rules. In particular, as provided in Article 31(3) of Regulation (EU) 2024/1143, a trade mark, which has been applied for, registered, or established through use in good faith within the territory of the Union, before the date of submission of the application for registration of a conflicting geographical indication to the Commission, may continue to be used and renewed, provided that no grounds for its invalidity or revocation exist. In line with those rules, if the conditions of the aforementioned provision are fulfilled, trade marks registered before the registration of a Slovak wine PDO/PGI, even if such trade marks contain a PDO, may continue to co-exist with the PDO and be used.

4. IP Office (ÚPV) also approves trademarks such as 'Vína Malých Karpát' (figurative marks containing word elements). Is it contrary to Regulation (EU) No 1308/2013, since there is PDO Malokarpatská/ské/ský víno/vine-growing area?

In order to determine if the registration of trademarks such as 'Vína Malých Karpát' (meaning: 'Wines of Small Carpathians') would be in contravention to the protection of PDO 'Malokarpatská / Malokarpatské / Malokarpatský' (being an adjective from Small Carpathians), the general rule is that trade marks that contravene the protection set out in Article 26(1) of Regulation (EU) 2024/1143 should not be registered. Additional elements are usually taken into account by IP offices. In particular, IP offices may register trade marks containing a geographical indication with the limitation that they are used only on products that comply with the product specification of the geographical indications.

5. We have protected specific wine names: Skalický rubín, Karpatská perla and we have protected areas, e.g. "malokarpatská vinohradnícka oblasť". Can, for example, "Skalický rubín" and "Karpatská perla" use the registered name of the wine on the front and the name of the region "malokarpatská vinohradnícka oblasť" on the back of the label, possibly with EU symbols?

Slovakia has protected as PDOs the names ‘Malokarpatská / Malokarpatské / Malokarpatský’, as well as ‘Skalický rubín’ or ‘Karpatská perla’, where the latter two PDOs are contained within the demarcated area of PDO ‘Malokarpatská / Malokarpatské / Malokarpatský’.

A product may not bear two GI names simultaneously, because this would contradict the fundamental principles of the GI protection system and the rules on consumer information. Each GI is defined by a unique product specification that establishes the product’s characteristics, the production method, the geographical area and its link with the product. As such, the name identifies a specific and exclusive relationship between concrete product and concrete area; it therefore cannot be shared or combined with another protected name without undermining the clarity and credibility of that link. Consequently, two PDO names – e.g. ‘Malokarpatská’ and ‘Skalický rubín’ may not be used on the same wine.

In this regard, please note that the name ‘**malokarpatská** vinohradnícka oblasť’ (i.e. *wine-growing area of Small Carpathians*), to which you refer, may not be put on a label of ‘Skalický rubín’ PDO or ‘Karpatská perla’ PDO arguing that it is not used as a PDO name but as a name of the protected area determined by the national legislation. The name ‘Malokarpatská / Malokarpatské / Malokarpatský’ is a protected GI name that can be used exclusively on wine which meets the requirements of the product specification of PDO ‘Malokarpatská / Malokarpatské / Malokarpatský’.

The rules on the use of the Union symbols apply, as referred above.

6. *If the name of a protected wine-growing region with a wine variety is used, e.g. "malokarpatský rizling", can the PDO information be used? Or with the name TOKAJSKÉ VÍNO, can “Tokajské samorodné suché”, PDO be used?*

‘Malokarpatský rizling’ appears to combine the name of the PDO ‘Malokarpatský’ and the name of grape variety ‘rizling’. These two elements are subject to different rules. If the PDO name ‘Malokarpatský’ is used in presentation or labelling of wine, the term ‘protected designation of origin’ must be used as well (see Article 119 (1)(b) of Regulation (EU) 1308/2013 ⁽³⁾), while the use of the Union symbol or abbreviation ‘PDO’ is optional (see Article 120(1)(e) and (h) of Regulation (EU) 1308/2013). The use of the name of a grape variety in labelling and presentation of PDO wine is subject to rules provided in Article 120(1)(b) of Regulation (EU) 1308/2013) and Article 50 of Commission Delegated Regulation (EU) 2019/33 ⁽⁴⁾.

In this context, please note that the full name of the PDO, as registered, should be used in labelling and presentation of wine. Neither ‘TOKAJSKÉ VÍNO’, nor ‘Tokajské samorodné suché’ are registered PDO names and thus they may not be associated with the term ‘protected designation of origin’ nor with the Union symbol, nor abbreviation ‘PDO’. If the producers wish to use those elements, they need to use the full name as registered, i.e. ‘Vinohradnícka oblasť Tokaj’ or ‘TOKAJSKÉ VÍNO zo slovenskej oblasti’.

7. *Protection date of certain Slovak wine and spirit drinks GIs*

⁽³⁾ ELI: <http://data.europa.eu/eli/reg/2013/1308/oj>

⁽⁴⁾ ELI: http://data.europa.eu/eli/reg_del/2019/33/oj

As regards your question concerning the start of protection date for wine and spirit drinks GIs from Slovakia, which were negotiated as a part of its accession, the situation is following. The protection date, i.e. 17 February 2006, for Slovak wine PDOs such as Malokarpatská, Južnoslovenská, Nitrianska, Stredoslovenská, Východoslovenská or 'Vinohradnícka oblasť Tokaj' is the date of the publication of the List of quality wines produced in specified regions ⁽⁵⁾. This publication was made pursuant to Article 54 of Council Regulation (EC) No 1493/1999 ⁽⁶⁾. Pursuant to its paragraph 4, Member States were obliged to forward to the Commission the list of quality wines psr (quality wines produced in specified regions) which they have recognised, stating, for each of these quality wines psr, details of the national provisions governing the production and manufacture of those quality wines psr. On such basis, pursuant to paragraph 5 of Article 54, once the Commission received from the Member States the list of quality wines psr, it published it in the 'C' Series of the Official Journal of the European Communities. Even though, the Treaty of Accession of the Czech Republic, Estonia, Cyprus, Latvia, Lithuania, Hungary, Malta, Poland, Slovenia and Slovakia (the Treaty of Accession)⁽⁷⁾ mentioned certain wine-growing areas in Slovakia, i.e. *'wine-growing areas of the Small Carpathians, South Slovakia, Nitra, Central Slovakia and East Slovakia'* or *Tokaj*, these were the names of wine-growing zones and not the names of quality wines, which were communicated by Slovakia at a later stage.

The situation was different for spirit drinks. The protection date of GI 'Spišská borovička', i.e. 23 September 2003, is the date of the publication of the Treaty of Accession. The Treaty of Accession directly mentioned the names to be entered as 'geographical designations' in Annex II of Council Regulation (EEC) No 1576/89 ⁽⁸⁾ and thus giving grounds for protection of the spirit drinks names entered in this Annex as of the date of the publication of the Treaty of Accession.

The above information is based solely on the facts set out in your emails of 28 August, 10 September and 10 October 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

⁽⁵⁾ Publication of List of quality wines produced in specified regions in 2006/C 41/01 on 17 February 2006 eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C:2006:041:FULL

⁽⁶⁾ Council Regulation (EC) No 1493/1999 on the common organisation of the market in wine, ELI: <http://data.europa.eu/eli/reg/1999/1493/2004-05-01>

⁽⁷⁾ Act concerning the conditions of accession of the Czech Republic, the Republic of Estonia, the Republic of Cyprus, the Republic of Latvia, the Republic of Lithuania, the Republic of Hungary, the Republic of Malta, the Republic of Poland, the Republic of Slovenia and the Slovak Republic and the adjustments to the Treaties on which the European Union is founded - Protocol No 3 on the sovereign base areas of the United Kingdom of Great Britain and Northern Ireland in Cyprus; ELI: http://data.europa.eu/eli/treaty/acc_2003/act_1/pro_3/sign

⁽⁸⁾ Council Regulation (EEC) No 1576/89 of 29 May 1989 laying down general rules on the definition, description and presentation of spirit drinks; ELI: <http://data.europa.eu/eli/reg/1989/1576/2004-05-01>