



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

Brussels
AGRI.F.3/EM

Subject: Use of a GI as an ingredient in processed foods - guidance request

Dear Sir,

Thank you for your letter of 22 April 2026 in which you requested guidance in relation to the use of a GI as an ingredient in processed food.

You referred to 2 case scenarios: production of “fruit product made from ‘Pineapple XYZ’ PDO” by Operator A and “Pastry made with ‘Apple WXY’ PGI” by Pastry Chef C. Both cases involve operators producing a processed food product using a PDO or PGI ingredient but outsourcing an intermediate processing step to a third party. The intermediate product (diced pineapple or apple filling) cannot itself be sold under the PDO/PGI name due to specification rules. In both cases traceability to the original PDO/PGI producer is ensured and there is a recognised producer group registered in e-Ambrosia.

You asked whether the final product can be marketed as “fruit product made from ‘Pineapple XYZ’ PDO” or “apple pastry made from ‘Apple WXY’ PGI”, even though it was produced from an intermediate product containing the PDO/PGI ingredient. Further, you sought clarification whether the PDO/PGI name (e.g., ‘Pineapple XYZ’ PDO or ‘Apple WXY’ PGI) can be included in the ingredients list of the final product. Finally, you asked if the Operator A or Pastry Chef C must notify the recognised producer groups of their use of the PDO/PGI ingredient in this manner.

The specific indication on the label of a processed product of a GI designating an ingredient of that processed product is always subject to the rules of Regulation (EU) 2024/1143 and in particular to the provisions of point (a) of the first paragraph of Article 26, Article 27(1) and Article 37(7).

In the examples given: “fruit product made from ‘Pineapple XYZ’ PDO” and “apple pastry made from ‘Apple WXY’ PGI”, the geographical indication used as ingredient is used in the name of a processed product, therefore the conditions of Article 27(1) of Regulation (EU) 2024/1143 apply.

Under this provision the use of a geographical indication in the name, labelling or advertisement of a processed food product is permitted where the three conditions are fulfilled:



- a) the processed product does not contain any other product comparable to the ingredient designated by the geographical indication;
- b) the ingredient designated by the geographical indication is used in sufficient quantities to confer an essential characteristic on the processed product concerned; and
- c) the percentage of the ingredient designated by the geographical indication in the processed product is indicated in the label.

In practical terms, this means that Operator A may label the fruit product as “fruit product made from ‘Pineapple XYZ’ PDO” and Pastry Chef C may label the apple pastry as “apple pastry made with ‘Apple WXY’ PGI” provided the requirements of Article 27(1) are respected.

The ingredients list may include a reference to ‘Pineapple XYZ’ PDO” or ‘Apple WXY’ PGI, even though they include an intermediate product containing the PDO/PGI ingredient, provided that the reference complies with conditions of Article 37(7) of Regulation (EU) 2024/1143, according to which indications and abbreviations may be used in the labelling and advertising material of processed products when the geographical indication refers to an ingredient and they should be placed next to the name of the ingredient that is clearly identified as an ingredient. The Union symbol cannot be used.

The reference to PDO/PGI ingredient should be made in accordance with rules applicable to the other ingredients mentioned and respecting the general rules of Regulation (EU) No 1169/2011, in particular Article 7(1) that requires that food information should not be misleading, particularly as to the nature, identity, properties and composition of the food.

Regarding the obligation to notify the recognised producer groups, Article 27(2) of Regulation (EU) 2024/1143 introduces a requirement to notify only for prepacked food products where the name of the product includes a geographical indication and where the Union GI Register (eAmbrosia) indicates the existence of a recognised producer group. In the scenarios you described, producers of processed food products containing as an ingredient a product designated by a geographical indication would like to use that geographical indication in the name of that food product and the recognised producer group exists and it is indicated in the Union register. However, it is not clear if the fruit product and apple pastry are a prepacked food as defined in article 2(2), point (e) of Regulation (EU) No 1169/2011. If it is the case, a prior written notification should be given to the recognised producer group.

The above information is based solely on the facts set out in your e-mail of 22 April 2026 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 faithfully,



Diego CANGA FANO