



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

Brussels  
 AGRI.F.3/

Dear Ms. [REDACTED]

Thank you for your email of 6 September 2024, in which you enquire about the interpretation of labelling requirements in Regulation (EU) 2024/1143 <sup>(1)</sup>.

Firstly, you refer to the requirement in Article 37(5) of Regulation (EU) 2024/1143. According to this provision, the name of the producer or operator must appear in the same field of vision as the geographical indication (GI). You ask whether your understanding is correct that the name of the producer/operator does not need to appear every time the GI is repeated.

The Commission services agree with this interpretation. While the name of the producer or operator must appear in the same field of vision as the GI, it is not required that the producer/operator's name must appear in every instance where the GI is repeated. The purpose of the requirement is to increase transparency about the producers/operators of products designated by GIs.

Secondly, you refer to Article 37(3) of Regulation (EU) 2024/1143. You ask whether the Commission agrees that the Union symbol does need to appear in same field of vision as the GI on every surface where the GI is repeated. The Commission services agree with this interpretation. Article 37(3) of Regulation (EU) 2024/1143 requires that the GI and the Union symbol shall appear in the same field of vision in the labelling, but it does not specify that it should be on every surface where the GI is repeated.

Furthermore, in this regard you enquire what is to be understood by “the same field of vision”. “The same field of vision” generally refers to the area on the labelling/packaging that can be seen from the same angle, without the need to turn the product. In accordance with Article 2(2)(j) of Regulation 1169/2011 <sup>(2)</sup>, the “field of vision” means all the surfaces of a package that can be read from a single viewing point. This suggests that the Union symbol does not have to be right

<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, OJ L, 2024/1143, 23.4.2024.

<sup>(2)</sup> Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004; OJ L 304, 22.11.2011.

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next to the GI, but it should be on the same part of the labelling. It could be possibly acceptable for the GI and the Union symbol to be on two adjacent surfaces, as long as they can be viewed simultaneously by the consumer.

Thirdly, you ask whether the GI can appear right next to a brand name or a descriptive term such as “traditional”, “Danish”, “tasteful” or the like, or whether the GI must appear isolated with no possible association with other names or words. There are no issues for a GI to appear next to a brand name. The brand name specifies the brand of the GI without implying a specific different quality of the product covered. Whether the GI may appear next to a descriptive term like those mentioned is questionable. If the term ‘traditional’ or ‘Danish’ or ‘tasteful’ is added next to the name of a GI, it may lead the consumer to think that the product is different from those that have the same GI name but are not accompanied by such a term, despite the fact that the products covered by the two kinds of name (GI accompanied or not accompanied by the term) have been produced following exactly the same product specifications.

Therefore, the correct approach is the following: if a product complies with the product specification of a GI, it may be marketed under the registered GI name. The addition of terms close to the GI name that may potentially mislead the consumers is forbidden. The possibility of adding ‘traditional’ or other terms on the label may be linked to different specificities of the products and must be regulated in the product specification itself.

Lastly, you ask if the requirement in Article 37(3) of Regulation (EU) 2024/1143 concerning the presentation of the GI to meet the requirements in Article 13(1) of Regulation (EU) No 1169/2011, applies to every instance where the GI appears on a product, or whether it is sufficient for only the primary appearance of the GI to meet these requirements.

Article 37(3) of Regulation (EU) 2024/1143 means that products designated by GIs must follow the same EU food labelling rules defined in Regulation (EU) No 1169/2011, as any other food product. Article 13(1) of Regulation (EU) No 1169/2011 refers to the presentation of mandatory particulars. Therefore, these rules also apply to GIs. This means that a GI shall be labelled in a conspicuous place in such a way as to be easily visible, clearly legible and, where appropriate, indelible. Naturally, these rules should apply to every instance where the GI appears on a product.

The present opinion is provided based on the facts as set out in your email of 6 September 2024 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 sincerely,



Diego CANGA FANO