

Guidance document on controls of geographical indications and traditional specialities guaranteed and related best practices

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The European Commission presents this document to address the ECA Special report 06/2022 on EU intellectual property rights with recommendations to the European Commission to improve the GI enforcement framework.

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Acronyms and abbreviations

ACN	Alert and Cooperation Network
ADR	Alternative dispute resolution
AREPO	Association of European Regions for Products of Origin
BTSF	Better Training for Safer Food
CA	Competent Authority
CMO	Common Market Organisation
ccTLD	Country-code top-level domain
DB	Delegated body
DG AGRI	Directorate-General for Agriculture and Rural Development
DG SANTE	Directorate-General for Health & Food Safety
DSA	Digital Services Act
ECA	European Court of Auditors
ECJ	Court of Justice of the European Union
ESA	EFTA Surveillance Authority
EU	European Union
EUIPO	European Union Intellectual Property Office
FIC	Food Information to Consumers ¹
GFL	General food Law ²
GI	Geographical indication
IPR	Intellectual Property Right
IR	Implementing Regulation
ISP	Internet Service Provider
MANCP	Multi-Annual National Control Plan
NA	National Authorities

¹ 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

² Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety

NP	Natural Person
OCR	Official Control Regulation ³
PDO	Protected Designation of Origin
PG	Producer groups
PGI	Protected Geographical Indication
RASFF	Rapid Alert System for Food and Feed
RPG	Recognised producer group
TRACES	Trade Control and Expert System
TSG	Traditional Speciality Guaranteed

³ Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products

1. Introduction

1.1 The purpose of this guidance document

The European Court of Auditors (ECA) assessed whether intellectual property rights related to -EU trademarks, EU designs and geographical indications are well protected within the Single Market. The ECA published a *Special report 06/2022 on EU intellectual property rights*⁴ with recommendations to the European Commission to improve the enforcement framework. Recommendation 4) included in the report suggests that the Commission should provide Member States with official guidelines on geographical indication (GI) controls.

While the responsibility for controls of geographical indications is a Member States' competence, nevertheless this guidance document aims at contributing to the understanding of the functioning of the GI control system and at facilitating the sharing of practical experiences and best practices among Member States for a strengthened GI system.

The ECA recommendation did not cover Traditional Speciality Guaranteed (TSG), being not an intellectual property right, however this scheme is part of the EU quality schemes, thus it is also included in the current document for coherence purposes.

In this regard, the current practical guidance does not impose any legal obligations on the Member States in relation to their control systems. It serves only as a practical and informal tool in the controls of GIs and TSGs illustrating a number of practical examples from the Member States.

This guidance document is a work in progress: it is neither exhaustive nor a final product but reflects the state of play at a certain point in time in accordance with the knowledge and experience available. Over time, it is expected that additional elements may be added.

1.2 Understanding GIs and TSGs

GIs are recognised as **Intellectual Property Rights** (IPR) under the World Trade Organization's (WTO) Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS)⁵ under Article 22.

As regards the international protection for the names of origin-based quality products, the World Intellectual Property Organization's (WIPO) Geneva Act of the Lisbon Agreement on Appellations of Origin and Geographical Indications, adopted 20 May 2015, entered into force on 26 February 2020.

The Geneva Act updates and enhances the existing international registration system protecting names that identify the geographical origin of products (Article 2.1 on GIs and

⁴ https://www.eca.europa.eu/en/publications/SR22_06

⁵ https://www.wto.org/english/docs_e/legal_e/31bis_trips_01_e.htm

Appellations of Origin). Together, the Lisbon Agreement and the Geneva Act of the Lisbon Agreement form the Lisbon System, offering a more comprehensive and effective international protection for names of origin-based quality products.

The EU has a particular responsibility to ensure the protection of IPR as this is mandated under the Charter of Fundamental Rights of the European Union (Article 17(2))⁶.

The EU system provides a uniform and exhaustive system of protection for geographical indications across the EU⁷.

TSGs are not covered by the WTO TRIPS agreement; they are not an IPR; there is no obligation from the Charter nor internationally to provide the protection. The TSG scheme is designed to valorise traditional products and production methods.

1.2.1 Geographical indication types in the EU (PDO, PGI, GI)

A geographical indication (GI) is an indication (name in the EU) used on products from a specific geographical origin that have a certain quality, reputation or other characteristic that is essentially attributable to that origin. The GI scheme confers IPR, granting producers in a defined geographical area the right to use the registered name if they comply with the product specification.

In the EU system there are 3 types of GIs: Protected Designations of Origin (PDOs) and Protected Geographical Indications (PGIs) in the agri-food and wine sectors, and Geographical Indications (GIs) for the spirit drinks. The link with the territory is stronger for PDOs than for PGIs and GIs:

- for PDOs, the quality or characteristics of the product are essentially or exclusively linked to the particular geographical environment of the place of origin. This encompasses natural and human factors, such as climate, soil conditions, topography, local know-how, etc.; all stages of the production, including the raw materials must take place in the defined geographical area;
- for PGIs and for GIs for spirit drinks, the quality, reputation or other characteristic is essentially attributable to its geographical origin. For PGIs/GIs at least one of the production steps, while for wine PGIs the production takes place in the defined geographical area.



Famous geographical indications include for example, “Champagne” PDO quality sparkling wine, “Rioja” PDO wine, “Bayerisches Bier” PGI beer, “Irish Whiskey” GI, “Καλαμάτα /

⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:12012P/TXT>

⁷ “BUDVAR II” – C478-07, par. 114

Kalamata” PDO olives, “Parmigiano Reggiano” PDO cheese, “Polska Wódka / Polish Vodka” GI, “Queso Manchego” PDO cheese and “Roquefort” PDO cheese.

Not to confuse

Indication of provenance

- Geographical mention on the labelling (e.g. made in France)
- Indicates that a product originates from a specific geographical region.
- Not allowed for wines without a GI
- Information should be accurate and not misleading consumers as to the true origin of the product



Geographical Indications

- Collective IP right: access to the right is open
- Product specification
- Protection for an indefinite period
- No fee
- Ex officio controls

‘Champagne’

‘Polish Vodka’

‘Rioja’

Trade marks

- Defined right owners
- Not linked to a territory
- No guarantees to product qualities
- Temporary protection; can be renewed
- Subject to a fee
- May be complementary to GIs



Source: DG AGRI own elaboration

1.2.2 Key GI Attributes

The registered GI names are granting producers in a defined geographical area the right to use the registered name if they comply with the product specification. The IPR protection aims at preventing illegal uses of a name, for example imitation or misuse of the name.

GIs promote fair competition by preventing illegal uses, give consumers a guarantee of authenticity due to official controls and distinguish products in the market.

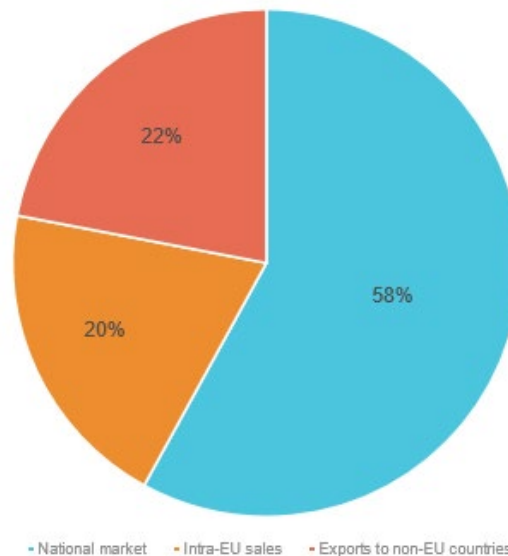
In economic terms, GIs are also differentiated on the market often by a higher price, on average two times higher as a non-GI labelled product. Their added value means that they secure higher-value sales and exports. Moreover, GIs distinguish the products from other similar products of the same type due to their specific qualities and characteristics thus facilitating consumers’ choices.⁸

As regards the economic dimension of geographical indications, it is not a niche market. The estimated sales value of EU GIs represents approximately 7 % of the total EU food and drink

⁸ Study on economic value of EU quality schemes, geographical indications (GIs) and traditional specialities guaranteed (TSGs), 2020 - <https://op.europa.eu/en/publication-detail/-/publication/a7281794-7ebe-11ea-aea8-01aa75ed71a1/language-en>

sector in 2017. On the other hand, the estimate of EU GI exports is around 15 % of EU food and drink industry exports. However, geographical indications are still sold mainly on the national markets, 60% of their sales value; while around 20% on the EU market and another 20% outside EU.⁹

Sales value of GI/TSG Products by destination, 2017



Source: *Study on economic value of EU quality schemes, geographical indications (GIs) and traditional specialities guaranteed (TSGs)*, 2020

GIs may contribute to sustainability as they may promote biodiversity by protecting indigenous animal breeds/plant varieties or protect the environment by less intensive livestock management systems. Also, the production is often based on traditional practices and usually use raw materials from the proximity areas, thus contributing to the reduction of the overall carbon footprint.

Given the fact that GIs are linked to a territory, their production contribute to local employment and economic development of their regions with a spill-over effect to local tourism and other linked activities. This is particularly important for rural areas and for disadvantaged regions.

⁹ Study on economic value of EU quality schemes, geographical indications (GIs) and traditional specialities guaranteed (TSGs), 2020 - <https://op.europa.eu/en/publication-detail/-/publication/a7281794-7ebe-11ea-aea8-01aa75ed71a1/language-en>





1.2.3 What are TSGs?

- **Traditional Speciality Guaranteed (TSG)** highlights traditional aspects such as traditional method of production or traditional composition, without being linked to a specific geographical area. The TSG scheme provides for labelling protection.



Examples of famous TSGs are “Bacalhau de Cura Tradicional Portuguesa” dried codfish product, “Amatriciana tradizionale” sauce, “Hollandse maatjesharing / Hollandse Nieuwe / Holländischer Matjes” fish product, “Heumilch / Haymilk / Latte fieno / Lait de foin / Leche de heno / Seneno mleko” cow milk.

Overview table of EU quality denominations

Geographical Indications - GIs			Traditional Speciality Guaranteed
			
PDO	PGI	GI	TSG
Protected Designation of Origin	Protected Geographical Indication	Geographical Indication	Traditional Speciality Guaranteed
Agricultural Products/Food Wines	Agricultural Products/Food Wines	Spirit drinks	Agricultural Products/Food

Source: DG AGRI own elaboration

2. Protection of GI/TSG names

The protection for GI/TSG names confers the **right to use** the registered name exclusively to the producers that comply with the product specification established for the given GI. The registered name is therefore protected against use to designate products that do not comply with the product specification.

The legal framework enables protection against the fraudulent use or imitation of these protected names, safeguarding the qualities, reputation, and origin of GI products linked to a specific geographical area or the methods of production in case of TSG products.

Protection rules are particularly relevant for the control of the use of the name on the market (Article 42 of Regulation (EU) 2024/1143¹⁰; please see *Section 4.1.5*). However, in case a non-conformity with the product specification is detected before putting the product on the market, the GI/TSG name and logo cannot be used on the product.

2.1 Scope of protection of GI names

The EU legislation provides a framework for an extensive protection of GIs in the EU Member States. All GIs benefit from the same level of protection in the Union. The rules on protection can be found in Chapter 3 (Article 26 to 37) of Regulation (EU) 2024/1143.

Producers are entitled to use of the protected GI name if they respect the product specification established for the GI product. In any case, a GI product shall comply with the relevant marketing standards.

The EU regulation refers to a variety of ‘uses’ against which the names registered as GIs are protected. This means that registered GI names shall be protected against the following.

- **Any (direct or indirect) commercial use of a GI** in respect of products produced without respecting the product specification, where those products are comparable to the products designated by the registered name or where use of that geographical indication for any product or any service (including if complying with the product specification) exploits, weakens, dilutes, or is detrimental to the reputation of the protected name, including when all those products are used as an ingredient. (Regulation (EU) 2024/1143 (Art. 26(1)(a)).

Direct and indirect use merely refer to the physical manner in which the use of a GI appears on the market: ‘direct use’ implies that the GI is affixed directly to the product or its packaging, while ‘indirect use’ requires the GI to feature in supplementary marketing or information sources, such as an advertisement for the product or documents relating to it.¹¹

Although the Regulation makes a reference to “*comparable products*” when defining the scope of protection, in fact there is no definition of “comparable product” under the Regulation.

¹⁰ 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

¹¹ Court (07/06/2018, C-44/17, SCOTCH WHISKY, EU:C:2018:415, § 32

Recital no 34 of Regulation (EU) 2024/1143 provides a reference to taking into account all relevant factors to determine whether one product is comparable to another. Those factors should include whether the products have common objective characteristics, such as method of production, physical appearance or use of the same raw material; under which circumstances the products are utilised from the point of view of the relevant public; whether they are frequently distributed through the same channels; and whether they are subject to similar marketing rules. For instance, Stelvio PDO cheese from Italy is not comparable with the Alfa Romeo Stelvio car.

Example: Focus on France Comparable products

Example of national jurisprudence from France (GR NO 19/14230):

Products comparable to “Piment d’Espelette” PDO pepper (using Local variety “GORRIA”) and Gorria Basque pepper. The confusion between the “Piment d’Espelette” PDO pepper and the Basque pepper, including the use of the PDO accompanied by an expression such as ‘style’, ‘type’, etc. (e.g. pepper powder of the Gorria variety, espelette type) is likely to mislead the reasonably well-informed and reasonably observant and circumspect consumer as to the true origin of her product.

(<https://www.legifrance.gouv.fr/juri/id/JURITEXT000047636350>)

In addition, the rule specifies that protection also applies *where use of that geographical indication for any product or any service exploits, weakens, dilutes, or is detrimental to the reputation of the protected name, including when those products are used as an ingredient*. This applies also to the products that are produced in compliance with the product specification.

Examples

- If a parfum is marketed under the name ‘Champagne’ (the product is not comparable but there is exploitation of the reputation);
- if the name of the product may be detrimental to the reputation although it designates the product complying with the product specification (‘Le Meilleur des Bordeaux’);
- if the name is used just to exploit the reputation of the GI (‘Parmigiano Reggiano’ GI) used as ingredient for biscuits and shown in font size on the label bigger than the font size used for the name of the processed product.

- Protection against **misuse, imitation or evocation** of the registered GI name protects consumers from being misled into believing that a product is a product covered by a GI, while this is actually not the case.

Any **misuse, imitation or evocation** of the name is prohibited even if accompanied by explanations or indications that the product is not the authentic GI.

Misuse is a very broad term. It occurs when a product uses a geographical indication improperly.

The notion of '**imitation**' may be used to circumscribe situations where there is a similarity deriving from copying/imitating a GI.

The notion of '**evocation**' is a criterion which is specific to the law of geographical indications, as has been explained by judgments of the Court of Justice of the European Union (ECJ), and which may most simply be paraphrased by '*bringing the product designated by the GI to mind*'.

Examples: Focus on France

- Example of national jurisprudence from France (GR NO 23/04999):

Les Vins De Bordeaux ('LVDB') operated a website under the domain name "lesvinsdebordeaux.com". The purpose of this platform was to connect potential customers with independent winegrowers so that they can market their wines directly without intermediaries. The applicants claimed that LVDB for using the designation 'Bordeaux' within the name "lesvinsdebordeaux.com" for offering for sale on that website a variety of wines, some of which cannot use the designation 'Bordeaux'. Such a use of the designation 'Bordeaux' in the website's name was found misleading the consumers as to the origin of the wine. Applicants asked to delete this domain name and to stop using the terms "Vins de Bordeaux" and "Bordeaux" on the website.

The Court ruling stated that by making direct and indirect commercial use of the 'Bordeaux' PDO, that exploits the reputation of the designation and therefore LVDB, as a 'marketing operator', infringed that designation. The court in its ruling ordered LVDB to remove the domain name "lesvinsdebordeaux.com".

https://www.courdecassation.fr/decision/67b781d9e38ac5af22c3200d?search_api_fulltext=%22%5B%E2%80%A6%5Diousdecisionindex=&nextdecisionpage=0&nextdecisionindex=1

- Example of national jurisprudence from France (GR NO 20/00401):

The court ruled that promoting and marketing of bottles of wines under the trademark name "L'Ermitage de Longueroch", "L'Ermitage Saint-Jacques", "L'Ermitage" in France is not compatible with the legislation. The bottles in question bear the denomination "L'Ermitage" for a comparable product, which evokes the "Hermitage / Ermitage / L'Hermitage / L'Ermitage" PDO wine name. A protected designation of origin and a protected geographical indication may be used by any operator, marketing a wine produced in accordance with the relevant product specification. In this case, the name used on the labelling constituting a designation of origin, evokes the registered PDO name, and shall not be used.

(Tribunal judiciaire de Paris, 3 mars 2022, n° 20/004012020/00401)

- Example of national jurisprudence from France (GR NO 21/07290)

Since the end of 2017, Cityart Edition company has been marketing a range of teas under the brand "Grappe de thé", which includes the teas "Nuit tranquille à Saint-Emilion", "Cœur de Sauternes" which became "Cœur perdu à Sauternes", "Les étoiles de [Localité 7] blanc" which became "Les étoiles blanches de [Localité 7]", "Printemps à [Localité 7]", "Noël à [Localité 7]" and "Amoureux de Margaux".

The mark 'Grappe de thé' is composed of several verbal and figurative elements, the term 'grappe' immediately brings grapes in mind, when associated with known names for wines. The designations 'Margaux', 'Saint-Emilion' and 'Sauternes', which although refer to cities, are essentially associated in the mind of the public with the vineyards of Bordeaux, thus their association with the trademark 'Grappe de thé' continues an evocation of the geographical indications in the mind of the public.


<https://www.legifrance.gouv.fr/juri/id/JURITEXT000047454942>

The notion of evocation has evolved in time: from a term reproducing part of the designation to a term conceptually linked to the registered name to a “*figurative signs*” evoking the geographical area with which a designation of origin is associated.

It is the task of national courts to establish whether a term or a figurative sign constitutes evocation by taking to account all the relevant factual, cultural and legal factors.¹²


Examples: Focus on Spain- Graphic evocation

“Queso Manchego” PDO



✓

Evocation of “Queso Manchego” PDO



Source: Spanish Ministry of Agriculture, Fisheries and Food

¹² Examples of evocation: oriGIn paper on the protection of PDO, PGI and GIs against “evocation”- https://www.origin-gi.com/wp-content/uploads/2021/09/oriGIn-paper-Evocation-14_09_2021.pdf

- **CAMBOZOLA judgement C-87/97:**
 evocation covers the situation where the term used to indicate a product (Cambozola to designate a cheese) reproduces part of a protected designation (Gorgonzola) and has the same number of syllables, so that, because of that resemblance, when the consumer is confronted with the name of the product, the image triggered in his mind is that of the product whose designation is protected. It shall be indicated that even though Cambozola is an evocation, being a prior use it coexists with Gorgonzola

- **GLEN BUCHENBACH - C-44/17:**
 evocation covers the situation where, despite the absence of any total or partial incorporation of the protected or name phonetic and/or visual similarity, the term used to indicate a product (Glen Buchenbach to designate a German Whisky) has such a conceptual proximity with a GI (Scotch Whisky, to which the term 'Glen', which defines a typical Scottish valley, is associated) that it directly triggers in the mind of the average European consumer the image of the product designated by the GI.

- **MANCHEGO judgement - C-614/17:**
 evocation covers the situation where it is not a term triggering the image of the product designated by the GI in the mind of the average European consumer , but "figurative signs" (image of Don Quijote and Sancho Panza, typically identifying the Region 'La Mancha', used on cheese from the same region but not complying with the product specification) which is associated with the geographical indication (Queso Manchego).

- **CHAMPANILLO case C-783/19:**
 The protection is extended also to the name of commercial activities (services) and not just products, as clarified by the Court of Justice of the European Union in case - (Comité Interprofessionnel du Vin de Champagne v. "Champanillo" bar). A Spanish tapas bar chain had used CHAMPANILLO in its name, why Champagne producers had brought action. The EU Court clarified the scope of protection and found that there was significant similarity between the name CHAMPANILLO and the world-famous Champagne protected by EU law due to its origin. A service provider's use of a name similar to names protected due to their special origin was deemed an infringement.

- As a rule, the EU regulations provide for the “right of use” (the positive protection) for the names entered in the EU register¹³. The **name is protected** with the **spelling as it is registered**, such as with **special characters or accents**, which should be respected in all cases when the name is being used, for instance on packaging.

Examples of names with special characters

- ✓ Großräschener See
- ✓ Wrångebäckstost
- ✓ Sjælland
- ✓ Époisses
- ✓ Ούζο

- If **multiple names** are registered, these names are interchangeable and any of them may be used.

Examples of multiple names registered

- ✓ “Porto / Port / vinho do Porto / Port Wine / vin de Porto / Oporto / Portvin / Portwein / Portwijn” - all names are registered and thus equally protected
- ✓ “Aceite de Ibiza / Oli d’Eivissa” - both names in Spanish and Catalan are registered and thus equally protected
- ✓ “Balaton/ Balatoni” - both names are registered with/without a suffix and thus equally protected
- ✓ “Trevenezie / Tri Benečije” - both names in Italian and Slovenian are registered and thus equally protected
- ✓ Irish Whiskey / Uisce Beatha Eireannach / Irish Whisky GI - all names are protected

- **Translations:** GIs are protected against translations. Therefore, use of translations is prohibited. In practice, **translations may be used only on labels of product complying with the product specification in addition to the registered name** when this is **necessary to inform about the nature of the product** that would be otherwise not understandable to the consumers in the given area where the product is marketed.

The GI symbols (GI logos) may be used only together with GI names in original language, as registered. If the product does not comply with the product specification,

¹³ <https://ec.europa.eu/agriculture/eambrosia/geographical-indications-register/> See also in Section X on the EU register and information tools.

the registered name may not be used, either in the original version or in the translated version.

- **Transcriptions/ Transliterations** of the name registered benefit of the same protection of the registered name if they are encoded in the eAmbrosia register.

Examples

- ✓ “Странджански манов мед / Strandzhanski manov med / Манов мед от Странджа / Manov med ot Strandzha” – not only are two different names protected: “Странджански манов мед” and “Манов мед от Странджа”, but also their transcriptions.
- ✓ “Φάβα Φενεού / Fava Feneou”

- The protected name is equally protected against **its use in translations, transcriptions or transliterations** or **when it is accompanied by an expression such as ‘style’, ‘type’, ‘method’, ‘as produced in’, ‘imitation’, ‘flavour’, ‘like’ or similar**, including when those products are used as an ingredient.

For example, if a packaging contains expressions such as ‘*Greek Style Plain Feta*’, it will be considered breaching the rules even if it conveys the idea that the product in question is not a ‘genuine’ “Φέτα / Feta” PDO cheese.

- **Any other false or misleading indication** as to the provenance, origin, nature or essential qualities of the product used on the inner or outer packaging, on advertising material or in documents or information provided in online interfaces relating to the product in question, as well as the use of packaging which by its characteristics is likely to create an erroneous impression as to its origin (Article 26 (1) (c) of Regulation (EU) 2024/1143).

The “**Parmesan case**” (C-132/05) ruling concerns the **use of graphical elements** (para 55): “According to the documents in the case, in Germany, certain producers of cheese called ‘Parmesan’ market that product with labels referring to Italian cultural traditions and landscapes. It is legitimate to infer from this that consumers in that Member State perceive ‘Parmesan’ cheese as a cheese associated with Italy, even if in reality it was produced in another Member State” (see Germany and Denmark v Commission, paragraph 87).

Even in the **absence of any risk of confusion** or of any association with (evocation of) the GI, it is prohibited to use on the inner or outer packaging, advertising material or documents relating to the product concerned, and the packing of the product in a container liable to **convey a false impression as to its origin**.

For example, elements which are typically identified for a particular area (a flag, typical colour or shape, traditional architecture, characteristic landscape etc.) that could mislead the public into believing a product comes from the specific country or region while such is not the case.



Source of photo: internet¹⁴

Example: Focus on France

Example of national jurisprudence from France (GR No 21/16284)

A company active in manufacturing and marketing of frozen products based on potatoes or prepared vegetables. Amongst which it manufactures products designated as “*Frites du Sud-Ouest cuites dans la Graisse de canard*” (French fries from Sud-Ouest cooked in duck fat) and “*Rissolées du sud-ouest cuisinées à la Graisse de Canard*” (Fried potatoes from Sud-Ouest cooked with duck fat).

Although on the packaging the term ‘Sud-Ouest’ is grammatically linked to potatoes and not to duck fat, the arrangement of the presentation visually encourages the consumer to associate ‘Sud-Ouest’ with duck fat and to establish a spontaneous and immediate link between those two names assuming that the duck fat used to prepare the dishes concerned comes from the mentioned geographical region and from ducks covered by the “Canard à foie gras du Sud-Ouest” PGI. The use of the indication ‘Sud-Ouest’ together with the duck fat on the labeling of the product has the effect of misleading the consumer as to the true origin of the product and thus exploiting the reputation of the “Canard à foie gras du Sud-Ouest” PGI and therefore constitutes an infringement.

(<https://www.courdecassation.fr/decision/65166cb5788aac83189e9dbd>)

¹⁴ <https://uk-gd.openfoodfacts.org/product/4061461216481/greek-style-salad-cheese-everyday-essentials>

If the product originates from the geographical area defined in the product specifications of a given GI, without benefiting from the GI designation the elements identifying that specific geographical area must not be misleading, i.e. suggesting that the product benefits from the given GI when this is not the case

- Any other **practice liable to mislead the consumer** as to the true origin of the product. This is a very broad provision to cover any practice misleading the consumer to believe that a given product is designated by a GI.

The '**Morbier**' case ruling (C-490/2019) concerns that Protected Designation of Origin (PDO) protection extends beyond just the name to include a product's distinctive visual appearance. The Court stated that the provisions must be interpreted as prohibiting the reproduction of the shape or appearance characterising a product covered by a registered name where that reproduction is liable to lead the consumer to believe that the product in question is covered by that registered name.

In this case, the French cheesemakers' association sued a company for producing a cheese that mimicked 'Morbier's' signature black line, arguing it misled consumers, and the European Court of Justice (CJEU) agreed, setting a precedent that protects distinctive features beyond the name itself.



"Morbier" PDO cheese; Source of photo: DG AGRI

Example: Focus on Spain

Example of a Spanish case (national jurisprudence)

A situation that may confuse the consumer and suggests that the cheese is a GI:
On the right, 'Queso Tetilla' PDO cheese, on the left, a non-GI cheese with the same shape:



Source: Spanish Ministry of Agriculture, Fisheries and Food

- The protection of GI names is also applicable to **goods in transit**, notably when goods are entering the customs territory of the Union without being released for free circulation within that territory; goods sold by means of distance selling, such as electronic commerce; as well as goods intended for **export to third countries**.

With the judgment from European Court of Justice (ECJ) in case of “PDO Feta” C-159/20, the ECJ concluded that products that are produced within the European Union and intended for export to third countries are not excluded from the prohibition of the unlawful use of protected designations of origin and protected geographical indications, that are produced or marketed within the European Union.

In this sense, the use of the name ‘Feta’ to designate products produced in the territory of the European Union which do not comply with the product specification of that PDO undermines the objectives of Regulation No 1151/2012, even if those products are intended for export to third countries.

- Regulation (EU) 2024/1143 introduced strengthened protection of GIs, explicitly extending its scope to include **domain names**. In this context, Article 26(2) provides

that GI protection measures apply to all domain names accessible within the Union. (e.g., www.champagne.com).

Furthermore, under Article 35, country-code top-level domain (ccTLD) registries established in the Union must ensure that alternative dispute resolution (ADR) procedures for domain name disputes recognise registered GIs as enforceable rights in such proceedings. (e.g. Calasparra.com.es; Jabugo.com.es)

Example: Focus on France

Example of national jurisprudence from France (GR NO 19/14230):

The reservation of a domain name bearing a registered GI name, to which the word 'info' is added, is likely to mislead the consumer by suggesting that it is a general information site relating to the GI (in this case www.piment-espelette.info, referring to "Piment d'Espelette" PDO chili pepper, whereas that is not the case).

The reservation of that domain name constitutes *private use* contrary to the principle of *collective use* of the PDO which belongs to all authorized producers in a region and that such a name cannot be monopolized by a single operator (whether or not it is authorized).

(<https://www.legifrance.gouv.fr/juri/id/JURITEXT000047636350>)

2.1.1 Use of geographical indications designating a product used as an ingredient in the name of a processed product

A particular aspect of the prohibition of misleading consumers is when GI products are used as ingredients. Labelling rules ensure that consumers are not misled as to the nature, identity, properties of the product and that the reputation of the GI is not unduly exploited.

Practice confirms that GI products are often used as ingredients in processed products. Moreover, in many cases the registered GI name itself is put on the packaging of the processed product. The recent legislative review incorporated the main provisions of the "*Guidelines on the labelling of foodstuffs using protected designations of origin (PDOs) or protected geographical indications (PGIs) as ingredients*"¹⁵ in Regulation (EU) 2024/1143, under Article 27.

¹⁵ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2010:341:0003:0004:EN:PDF>

Use of the GI name in the name of the processed product (e.g. *Ravioli with Comté PDO*): if an agricultural or wine GI product is used as an ingredient in a processed product, it may be used in the name of that processed product, or in its labelling, or in its advertising material if all three conditions are fulfilled:



Source of photo: Internet¹⁶

- i. the processed product does not contain any comparable product to the ingredient designated by the geographical indication;
- ii. the GI ingredient is used in sufficient quantities to confer an essential characteristic on the processed product;
- iii. the percentage of the GI ingredient used in the processed product is indicated in the label.

A judgment of the EU Court of Justice (Case C-393/16, "**Champagner Sorbet**"): A company distributing, inter alia, foodstuffs, began to sell a frozen product manufactured by Galana NV, intervener in the main proceedings in support of Aldi. That product was distributed under the name 'Champagner Sorbet' and contained, among its ingredients, 12% champagne.

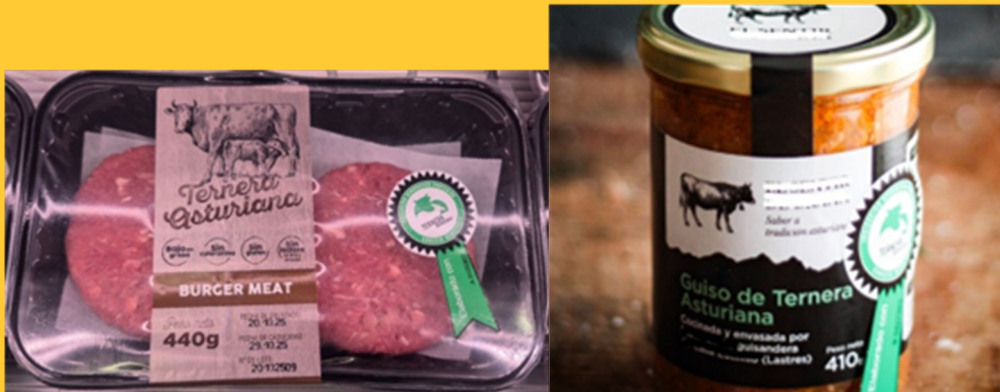
The ruling stated that the use of a PDO as part of the name under which a foodstuff is sold that does not correspond to the product specifications for that PDO, but contains an ingredient that does correspond to those specifications, such as 'Champagner Sorbet', constitutes exploitation of the reputation of a PDO, within the meaning of those provisions, if that foodstuff does not have, as one of its essential characteristics, a taste attributable primarily to the presence of that ingredient in the composition of the foodstuff.

¹⁶ <https://www.saint-jean.fr/les-pates-farcies-saint-jean>

Example: Focus on Spain

Use of the GI name in the name of the processed product- Examples of correct labelling

➤ “Ternera Asturiana” PGI (bovine meat)



Products with a GI (Ternera Asturiana PGI) as an ingredient. The Regulatory Board for the ‘Ternera Asturiana’ PGI (recognized producer group) enters into an agreement with the producer and distributes them with numbered labels with which it can carry out documentary checks (mass balance). The label includes the words ‘Processed with:’ accompanying the CR logo and does NOT include the European logo, so as not to induce the consumer to believe that the product itself is a PGI.

➤ “Faba Asturiana” PGI (white beans)



Product in which the PGI Faba Asturiana is an ingredient. The Regulatory Board distributes numbered labels with which it can carry out checks. The label includes the words ‘Processed with:’ accompanying the CR logo and NOT include the European logo, so as not to induce the consumer to believe that the product itself is a PGI.

Source: Spanish Ministry of Agriculture, Fisheries and Food

In case of **prepacked food** containing a GI as an ingredient, producers wanting to use that geographical indication in the name of that prepacked food, including in advertising material, shall give a prior written notification to the recognised producer group (RPG) for that geographical indication, if an RPG exists for that agricultural GI. This obligation applies once the name of the recognised producer group is encoded in the Union register of geographical indications pursuant to Article 33(8) of Regulation (EU) 2024/1143.

Until this registration occurs, Article 27(2) does not apply. The notification shall include information demonstrating compliance with the three specified conditions.

When the GI ingredient is not displayed in the name of the processed products, or in its labelling, but solely in the list of ingredients, the above three conditions do not apply.

Specific rules are applicable for **spirit drink GIs**. The *Commission Notice (2022/C 78/03) on Guidelines for the implementation of certain labelling provisions* is applicable¹⁷, in particular point 3.2 on Conditions of use and labelling provisions and Point 3.5.6 on Allusions to GIs and related checks.

¹⁷ Guidelines for the implementation of certain labelling provisions of Regulation (EU) 2019/787 of the European Parliament and of the Council of 17 April 2019 on the definition, description, presentation and labelling of spirit drinks, the use of the names of spirit drinks in the presentation and labelling of other foodstuffs, the protection of geographical indications for spirit drinks, the use of ethyl alcohol and distillates of agricultural origin in alcoholic beverages, and repealing Regulation (EC) No 110/2008 - [EUR-Lex - 52022XC0218\(01\) - EN - EUR-Lex](#)

2.2 Scope of Protection of TSG names

Protection of TSG names for agricultural products, including foodstuffs is provided by Regulation (EU) 2024/1143 (Title III. Chapter II, Article 52-53).

The objective of the scheme for traditional specialities guaranteed (TSGs) is **to safeguard traditional methods of production and recipes** by helping producers of traditional products in marketing and **communicating the value-adding attributes of their traditional recipes** and products to consumers; secondly to generate added value by contributing to fair competition in the marketing chain, a fair income for producers and contributing to the achievement of rural development policy objectives.

Examples of TSGs

- ✓ TSG “Moules de Bouhot”, where the mussels are bred on poles on parts of the shoreline and affected by wave movements (FR)
- ✓ TSG “Pulpo Seco de Adra”, where limbs of the common octopus are salted and dried according to the traditional method (ES)
- ✓ TSG “Twaróg wędzony” is a particular type of non-ripened cheese. The production method is based on traditional processes derived from hot smoking of the cheese using smoke from the burning of wood from selected deciduous trees, salting by rubbing the cheese with salt or dipping the cheese in brine (PL)
- ✓ TSG “Pierekaczewnik” It's a baked product with an external appearance resembling a snail's shell. This effect is achieved by overlapping six very thin layers of rolled-out dough, sandwiching a filling (sweet or meat-based), and rolling it into a roll. The resulting dough is baked in a round dish, which gives the "Pierekaczewnik" its desired shape. (PL)
- ✓ TSG “Heumilch” is a type of cow milk from animals fed primarily on fresh grass, hay, and other herbs. Originating from the Alpine region, hay milk is a traditional, seasonal product known for its rich, diverse flavour. (AT)

TSGs are practically recipes, **without a link to a specific geographical area** and highlight the traditional characteristics of a product either in its production process or composition.

A name shall be eligible for registration as a traditional speciality guaranteed where it describes a product that:

- (a) results from a mode of production, processing or composition corresponding to traditional practice for that product; or
- (b) is produced from raw materials or ingredients traditionally used.

A name to be eligible for a TSG registration shall:

- (a) have been traditionally used to refer to the product; or
- (b) identify the traditional character of the product.

In this context, a definition is provided of 'traditional' as 'historical usage of the name' by producers in a community for a period that allows transmission between generations; that period is to be at least 30 years and such usage may embrace modifications necessitated by changing hygiene, safety and other relevant practices.'

TSGs **do not confer IPR** to the producers through the registered name. There is no link to a geographical area and the name can be used anywhere, without territorial restrictions, if the producer is respecting the product specification of the TSG product.

TSGs are protected against any misuse, imitation or evocation, even if the protected name is translated, including as regards products used as ingredients, or against any other practice liable to mislead the consumer. The exploitation of the reputation of the TSG is not mentioned by the legislation.

3. Official Controls

Official controls are necessary for the proper functioning of the system that protect geographical indications and traditional specialities guaranteed. Enforcement actions in the market are important to prevent fraudulent practices and combating of counterfeiting effectively, thus ensuring that producers are properly rewarded for the added value of their products.

3.1 EU legislative framework for the controls of GIs and TSGs

The main rules regulating official controls of GIs/TSGs can be found under the following EU regulations.

Official Controls Regulation (OCR) Regulation (EU) 2017/625		
Regulation (EU) 2024/1143 and Commission Implementing Regulation (EU) 2025/26		
Additional Sector specific control rules		
Agricultural products	Spirit drinks	Wines
In particular ➤ General principles [Articles 2-15] ➤ Delegation of tasks [Articles 28-33] ➤ Enforcement actions [Art 137-140] ➤ Methods of analyses and rules on official laboratories [Articles 34-39], only if relevant		
➤ GI Regulation (EU) 2024/1143 Article 38-45 ➤ TSGs - Regulation (EU) 2024/1143 Articles 71-77 ➤ Commission Implementing Regulation (EU) 2025/26 Article 17 (Article 33 for TSGs) on Attestation of compliance ➤ TSGs: Delegated Regulation 2025/27 Article 12 on TSGs used as an ingredient in processed products	➤ GI Regulation (EU) 2024/1143 Article 38-45 ➤ Commission Implementing Regulation (EU) 2025/26 Article 17 on Attestation of compliance <u>General rules on spirit drink controls:</u> ➤ Spirit drinks regulation 2019/787 (Art 43(1)) and Implementing Regulation 2021/724	➤ GI Regulation (EU) 2024/1143 Articles 38 (1) and (2)(b), 42, 43 and 45 ➤ Commission Implementing Regulation (EU) 2025/26 Article 17 on Attestation of compliance ➤ CMO Regulation 1308/2013 for wines (Articles 90a and 116 a) ➤ Commission Implementing Regulation (EU) 2019/34 Articles 15-20 <u>General rules on wine controls:</u> ➤ Article 90a of Regulation 1308/2013, on checks and penalties related to marketing rules for products ➤ Commission Delegated regulation (EU) 2018/273, Chapter VII, Article 36-45

Member States shall have national legislative framework for the implementation of GI/TSG controls. This may include requirements for arrangements of tasks, procedures, documentation and obligations of actors.

3.2 General requirements

General rules on official controls regarding GIs/TSGs are laid down in the Official Controls Regulation (OCR), Regulation (EU) 2017/625.

Competent authorities shall perform official controls on all operators regularly, on a risk basis and with appropriate frequency, in accordance with Article 9 (1) and (2) of OCR to identify possible fraudulent or deceptive practices.

The principles of food law and requirements governing food in general, and food safety in particular are regulated in Regulation (EC) No 178/2002 on General Food Law (GFL).

Regarding **traceability**, there is a requirement in Article 18 of GFL for traceability of food¹⁸ and of food-producing animals and any other substances expected or intended to be incorporated into food. Under the said regulation, food business operators (operators) are required to have systems in place to identify the source of any food, feed or food ingredient and the businesses to which they supply their products. These provisions apply to all food products, including those with a registered GI/TSG name.

For **GIs designating agricultural products, not considered as food products**, which nevertheless fall under the scope of Regulation (EU) 2024/1143 (e.g. “Szőregi rózsató” PGI rose plant), the GFL provisions do not apply.

3.3 Official controls on operators under the Official Controls Regulation

3.3.1 General rules on official controls

In line with Article 4 of OCR, for use and labelling of protected designations of origin, protected geographical indications and traditional specialities guaranteed, Member States shall designate the **competent authority** or authorities (CA) on which they confer the responsibility to organise or perform official controls and other official activities.

The CA is responsible to organise or perform official controls and other official activities, and may delegate certain official control tasks to **delegated bodies** (DB) or one or more **natural persons** (NP). (No delegation to a natural person for the control of geographical indications or traditional specialities guaranteed from third countries).

¹⁸ According to Article 2 of GFL ‘food’ (or ‘foodstuff’) means any substance or product, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be ingested by humans.

As defined in the OCR, ‘official controls’ are activities performed in order to verify compliance with the OCR and with food and feed law, rules on animal health and welfare, and rules on plant health and plant protection products at Union level and as established by the Member States.

Article 1(2)(j) of the OCR specifically refers to the **official controls performed for the verification of compliance with the rules in the areas of use and labelling of protected designations of origin, protected geographical indications as well as traditional specialties guaranteed**. This provision is applicable for agricultural products and spirit drinks, but not for wines¹⁹. The competent authorities may combine controls under all legislation referred to in Article 1 of the OCR, but the objectives of food safety controls and those of GI/TSG control are very different.

However, according to Article 116a (2) of Regulation (EU) 1308/2013, a number of provisions of the OCR are applicable for **GI wines**:

- Article 4(2) and (4) on designation of competent authorities;
- Article 5(1), (4) and (5) on general obligations of competent authorities.
- The **CA/DB established according to the OCR shall verify compliance with the product specification annually** (Article 116(a)(3) of regulation (EU) 1308/2013 and Article 15 and 19 of Commission Implementing regulation (EU) 2019/34).
- In accordance with Article 36(2) of the Delegated Regulation (EU) 2018/273, **official checks for wines shall be carried out by the CA in accordance with the general principles laid down in the OCR** without prejudice to the provisions of this Regulation and of Chapter VI of Implementing Regulation (EU) 2018/274.
- Checks pursuant to Article 90a of Regulation 1308/2013 (wine), where those checks identify possible fraudulent or deceptive practices in respect of the marketing standards.

In addition, regarding wines, at EU level extensive accounting rules and reporting obligations are in place under Delegated Regulation (EU) 2018/273, Implementing Regulation (EU) 2018/274, Delegated Regulation (EU) 2019/33, Regulation (EC) 178/2002, which may be complemented by national level additional rules.

Designated **competent authorities** of the Member States shall in accordance with Article 9 of the OCR, **perform** the official controls:

- regularly,
- on a risk basis and with appropriate frequencies,
- taking account, inter alia, of past history of compliance and the reliability of operators’ own controls.

The **frequency** of official controls should be **regular and proportionate to the risk** and determined by the competent authorities on the basis of inter alia:

- identified risks;
- operator’s past record of compliance or non-compliance;

¹⁹ Article 1(4)(a) of Regulation (EU) 2017/625

- of the reliability of the operator’s self-control and traceability systems and
- any other information indicating the likelihood of non-compliance, including potential fraudulent or deceptive practices .

As far as **risk analysis** is concerned, the following **factors** need to be taken into account:

- identified risks associated with animals and goods, the activities under the control of operators, the location of the activities or operations of operators and the use of products, processes, materials or substances,
- information indicating the likelihood that consumers might be misled,
- to identify operators of higher risk based on operators’ past record as regards the outcome of official controls performed on them,
- the reliability and results of own controls performed by operators, or by a third party, including private quality assurance schemes,
- any other information that might indicate non-compliance.

Example: focus on France

Main criteria used to identify operators as being at risk (non-exhaustive list) regarding GI controls:

- Recent operator accreditation
- Non-compliant internal control results
- Report from the competent authorities
- Mixed operation (production of GI and non-GI products)
- Operator having benefited from an individual exemption measure with specific implementation conditions
- Operator subject to transitional measures included in the specifications
- Customer complaints brought to the attention of the certifying body or the group
- Period of inactivity

(Source: DG AGRI control seminar 2025; Qualisud)

The risk- based assessment exercise serves as the basis for the risk categorisation. One aim is to obtain a risk-based approach in physical controls – targeting risky products as opposed to just carrying out random controls.

Example: Risks identified for GIs/TSGs

GI products

- Counterfeit of GIs product by using raw materials/ ingredients non-compliant with the product specifications
- Manufacturing outside the delimited geographical area (if not allowed by product specifications)
- Misuse / Evocation of a protected name

TSG products:

- Method of production non-compliant to the product specifications
- Misuse/ evocation of the protected name

(Source: BTSF training)

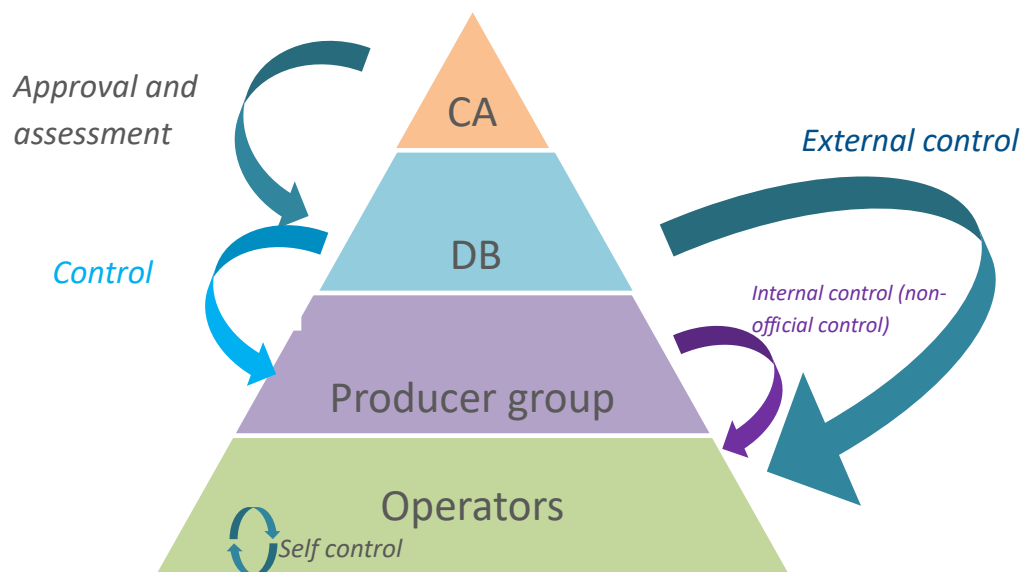
When carrying out the risk-analysis exercise, **e-commerce** should also be taken into account, as more and more products labelled as GIs/TSGs are sold online.

Actors entrusted with performing controls, in accordance with Article 12 of the OCR, must act on the basis of **written documented procedures** and must provide information and instructions to staff performing official controls. Possible internal procedural tools supporting consistent implementation can be the following:

- The **checklist** is an optional document consisting of a list of key points or questions to ask / to verify based on the product specification; it helps to carry out a logical and coherent control.
- **Guidelines** (Standard Operating Procedures) aim at ensuring a standard modus operandi, covering the following elements: planning of inspection (at the office); checking any conflict of interest; collection of information on the producer (productions, past inspections); list of potential tools or report needed during the inspection; report model in use.

Where necessary, competent authorities are required to make use of the **administrative assistance and cooperation mechanisms** whenever a case involves cross-border implications or cannot be effectively addressed by a single Member State acting alone. These mechanisms are established under the framework of the Official Controls Regulation (OCR) and detailed under *Section 5.3.1* of this Guidance document.

3.3.2 Schematic overview of GI/TSG controls



Source: DG AGRI elaboration in cooperation with INAO (France)

3.3.3 General procedural aspects related to controls of GIs/TSGs

The **product specification** is the basic document for controls.

Competent authorities within the meaning of Article 3(3) of the OCR ensure appropriate documented procedures/arrangements are in place for GI/TSG controls and implement them. These procedures must contain instructions for staff performing official controls in line with Article 12(1) of the OCR and must cover the subject areas for control procedures set out in Chapter II of Annex II to the OCR.

If control has been delegated to a body, they may develop such procedures, subject to the supervision and approval of their competent authority.

The arrangements include:

- **Multi-Annual National Control Plan (MANCP)**, in accordance with Articles 109-111 of the OCR, which in principle does not include wines.
- **Checklists** for the verification of compliance with the product specification – specific for each GI/TSG product.
- Several Member States develop a **control plan** based on national legislation, which the delegated control body must implement for each GI/TSG product. Depending on each of the requirements to be inspected, to ensure product compliance with production regulations, each control body may adopt its own specific internal checklists to be applied during inspection activities.

- Linked to the above point, several Member States develop **Guidelines** for the harmonised elaboration of the control plans (e.g. Standard Operating Procedures (SOPs)). For example, Italy has guidelines to standardise the preparation of the control plans for a number of sectors.

In accordance with Article 12 of Regulation (EU) 2017/625, competent authorities and delegated bodies shall have control verification procedures in place and regularly updated:

- to verify the effectiveness of official controls that they carry out,
- to ensure that corrective action is taken, when shortcomings are identified, and are in line with the documented procedures.

Verification of the compliance with the product specification takes place at any stage of the production process including slicing, grating as per requirements included in the product specification, and may include:

- verification that the operator's self-monitoring is sufficient and effective to ensure compliance with the specifications
- checks on the conditions set out in the product specification
- control on the product (organoleptic and/or analytical testing)

The specifications need to be analysed to determine the **critical points** (e.g. production steps, where irregularities are most likely to occur). These critical points may be, for example: the risk that the raw material comes from outside the demarcated area (where this is not permitted), the raw material does not correspond to the approved variety or breed, the primary producer or successive producers produce both common and PDO/PGI covered products, entailing a risk of mixing raw materials. However, the control shall verify compliance with all points of the specifications, whether critical or not.

The delegated bodies²⁰ shall comply with and be accredited for the delegated tasks in accordance with the Standard EN ISO/IEC 17065²¹ or Standard EN ISO/IEC 17020 and shall fulfil the requirements outlined by the OCR (Chapter III of Title II).

3.3.4 Role of operators in official controls

To the extent that is necessary for the performance of official controls, operators must, where required by the competent authorities, give to the staff of the competent authorities access to premises and other places under their control and surroundings, access to their computerised information management systems, goods under their control and related documents and any other relevant information.

²⁰ Article 41 of Regulation (EU) 2024/1143 and Article 116a(3) of Regulation (EU) No 1308/2013

²¹ Policy document EA-3/02 concerning the accreditation for Certification Bodies of the European co-operation for Accreditation- <https://european-accreditation.org/publications/ea-3-02-m/>

To this end, operators shall have in place systems and procedures that enable them to furnish this information to competent authorities upon request.

In this sense, to

- ensure that they comply with all aspects of their product specification,
- guarantee the traceability of animals and goods, including semi-finished goods, raw materials, ingredients, processing aids and other products used in the preparation and manufacture of goods, or in the feeding or treatment of animals at all stages of production,
- be able to identify any supplier of the items mentioned in the previous point and any purchaser of the GI product. To have systems and procedures in place in order to identify the other businesses from which they purchase products and to which they supply their products and to
- ensure that documented and actual product stocks correspond at all times.

To comply with the provisions of Article 20 (Proof of origin) of Commission Implementing Regulation (EU) 2025/26, in particular operators of PDO/PGI **agricultural products** shall be able to identify procedures in place as regards traceability of raw materials, feed and other items that, according to the product specification, are required to come from the defined geographical area.

As regards **wines, spirit drinks GIs** and TSGs such provisions are not explicitly spelled out in the GI regulations, however when checking the compliance with the product specification, the sourcing of the raw materials (e.g. grapes from the delimited geographical area) shall be checked and traceability shall be ensured according to the GFL laying down general safety rules and national legislation containing rules on the documentation and traceability of wines and spirit drink products. In addition, regarding wines, at EU level extensive accounting rules and reporting obligations are in place under Delegated Regulation (EU) 2018/273, Implementing Regulation (EU) 2018/274, Delegated Regulation (EU) 2019/33, which may be complemented by national level with additional rules.

3.3.5 Role of the European Commission

The Commission performs controls in Member States to verify compliance with the rules falling under Article 1(2) of the OCR (Article 116(1)).

According to Article 38(4) of Regulation (EU) 2024/1143, the Commission shall perform the controls, including audits, on GIs provided for in Title VI, Chapter I, of the OCR. These actions are based on a risk analysis that considers the relative volume of GIs in the Member State, the number of checks carried out and any irregularities linked to the verification of compliance or of use of the geographical indications set out in the Member State's annual report prepared in accordance with Article 113 of the Regulation (EU) 2017/625 (*please also see Section 3.4 on Planning of official controls and reporting*).

3.4 Planning of official controls and reporting

In accordance with Article 10 of the OCR, official control activities cover both production and market levels. Controls should be **planned** and there should be **annual reporting in place**.

The performance of official controls by the competent authorities of Member States, including checks in the marketplace is organised on the basis of the **multi-annual national control plans** (MANCPs); the MANCPs cover GIs/TSGs (Article 110 (2) of the OCR). The main rules on the preparation and implementation of such planning can be found in Articles 109 to 111 of the OCR. PDO or PGI wines although not included in the MANCP, are also planned according to sector specific rules.

The detailed rules on the content of annual reports by the Member States can be found under Article 113 of the OCR. The **standard model form** set out in the Annex to Regulation (EU) 2019/723 helps to ensure the uniform presentation of Member States' annual reports. Part II of the Annex in its point 10) refers to the “*Use and labelling of protected designations of origin, protected geographical indications and traditional specialities guaranteed*”, providing a table format on number of official controls (pre-market, conventional market, e-commerce) and the number of non-compliances found.

Recommendations to MSs by DG AGRI for the annual reporting exercise under Regulation (EU) 2019/723 on the section related to GIs/TSGs

- *The standard format is limiting itself to numeric data, however it would be welcome to have a more detailed explanatory text with the sectorial differentiation (agricultural products, wines, spirit drinks as relevant) of such figures in the narrative text.*
 - *It would be useful to get a narrative explanation also per denomination (PGI, PDO, GI).*
 - *For agricultural products GI and TSG products, these are not necessarily distinguished per denomination – their separation in the narrative reporting would be appreciated.*
 - *It is recommended that control activities also cover cases when GIs are used as ingredients in other products, where GI names are presented on the label.*
 - *The inclusion of the mass caterers industry (catering, restaurants, hotels etc.) in the control activities would be a positive development.*
-

Annual reports by the Member States to the Commission shall be submitted by 31 August every year. Annual reports set out, inter alia, the outcome of official controls performed in the previous year under its MANCP, the type and number of cases of non-compliance detected in the previous year or the measures taken to ensure the effective operation of its MANCP, including enforcement action and the results of such measures.

The **European Commission** publishes the **Annual Reports** on the overall operation of official controls carried out in the Member States, by aggregating the main findings of the Member States MANCP annual reports.²²

²² https://food.ec.europa.eu/horizontal-topics/official-controls-and-enforcement/health-and-food-audits-and-analysis/annual-reports_en

Other than the information included in the annual reports, Member States must make available to the public at least once a year “relevant information concerning the organisation and the performance of official controls” (Article 11 (1) of OCR). In addition to that, they must also “ensure the regular and timely publication” (where appropriate, by inclusion in their annual reports (referred to Article 113(1) of the OCR, and their publication)) of further details about official controls, such as what measures were taken in cases of non-compliance, as well as the type and number of imposed penalties.

Example: frequency of inspections

Practice shows that in some Member States at least one inspection per year is performed for smaller producers who use geographical indications, while retailers and retail chains are subject to an inspection once a year. In smaller stores, a general inspection is carried out, during which a number of other requirements for retailers are also checked.

Example: Focus on Italy Reporting of control bodies to the competent authorities (Article 32 OCR)

Ministerial Decree no. 7552, among others, regulates specific requirements of PDO/PGI wine controls to be performed by control bodies.

- the procedure for registering control bodies in the specific register (annex 1);
- the guidelines for the uniform drafting of control plans and control schemes for PDO and PGI wines (text and tables of annex 2)
- including how to communicate a detected non-compliances (annex 4);
- the criteria for applying the fees charged by control bodies for their services (annex 3) and,
- how to report the controls performed the former year of a specific PDO/PGI wine (Annex 5).

Annex 5: The Annex of decree no. 7552 in force

4. How are GIs/TSGs controlled?

The use of GI and TSG schemes is voluntary, however once a producer decides to join the system, being subject to controls becomes compulsory. The relevant date from which a producer falls under the control regime is the date it notifies the competent authority of its intent to participate, in accordance with the Article 39 of Regulation (EU) 2024/1143.

Controls are essential to ensure the credibility of the GI and TSG schemes. A comprehensive system of checks and controls at every stage of production, processing, and distribution, supports consumer trust and the integrity of the schemes. This system is managed by the competent authorities designated by Member States or third countries.

Overview table on key control provisions per GI sector and TSGs

Provision	Agricultural products	Spirit drinks	Wines
Requirements of performing official control tasks of CA/DB/natural persons	Article 38(3) of Regulation 2024/1143 and the OCR	Article 38(3) of Regulation 2024/1143 and the OCR	Article 15 of IR 2019/34 in line with the OCR
	TSGs: Article 72(3) of Regulation 2024/1143 and the OCR		
Accreditation of DB/ CB	Article 41 of Regulation 2024/1143	Article 41 of Regulation 2024/1143	Article 15(3) of IR 2019/34
	TSGs: Article 73 of Regulation 2024/1143		
Verification in compliance with the product specification	Article 38(2) (a) and Article 39 of Regulation 2024/1143	Article 38(2) (a) and Article 39 of Regulation 2024/1143	Article 116a (3) of Regulation 1308/2013 and Articles 19-20 of IR 2019/34
	TSGs: Article 72(1) (a) and (6) of Regulation 2024/1143		
Verification of use of GIs on the market, including online	Article 38(2) (b) and Articles 42-43 of Regulation 2024/1143	Article 38(2) (b) and Articles 42-43 of Regulation 2024/1143	Article 38(2) (b) and Articles 42-43 of Regulation 2024/1143
	TSGs: Article 72(1)) (b) and Articles 74-75 of Regulation 2024/1143		
Mutual assistance and exchange of information	Article 44 of Regulation 2024/1143	Article 44 of Regulation 2024/1143	Article 19 (7) of Regulation 34/2019 and Article 43 of Commission Delegated Regulation (EU) 2018/273
	Title IV of the OCR	Title IV of the OCR	Title IV of the OCR

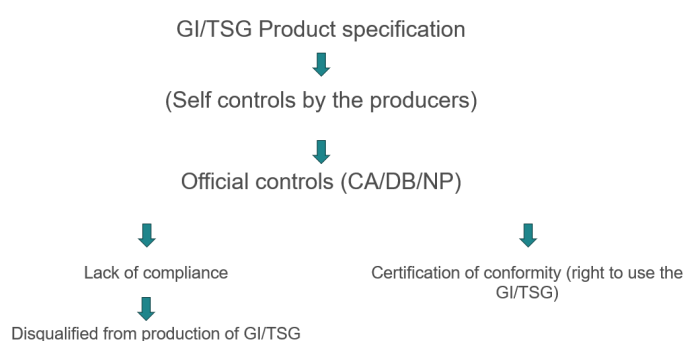
Official controls can be carried out by the competent authorities, or by the delegated bodies or in the case of agricultural products and spirit drinks by natural persons, to whom certain official control tasks have been delegated.

4.1 Main steps of GIs/TSGs controls

All GI/TSG products are covered by a **product specification** setting out the production rules and conditions for the given GI/TSG product as agreed upon by the producers. This is the basis for controls.

In this case, all steps of the production chain need to be controlled, in order to assure that compliance with the product specification is fulfilled.

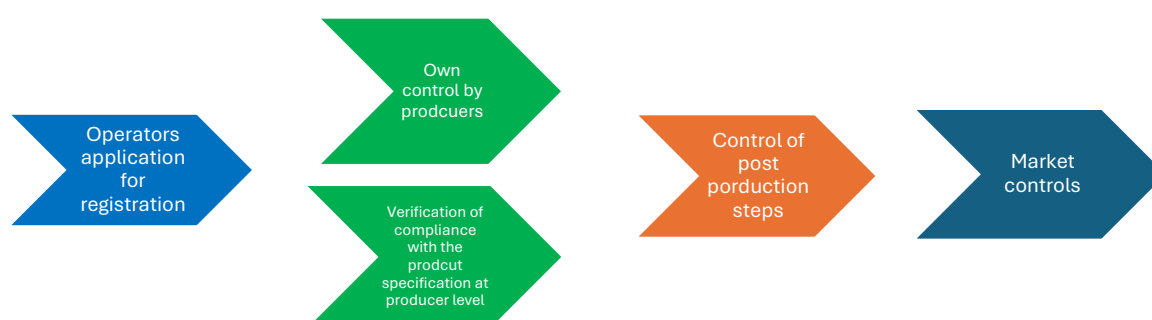
Consequently, controls shall concern both the **production stage** (verification of compliance with the product specification) and the use of the registered names on the **market**, including online interfaces.



Source: DG AGRI own elaboration based on IPKey materials

Verification of compliance with the product specification (official controls at the production level) should be carried out in accordance with the OCR for agricultural products and spirit drinks, and for wines according to Articles 15-20 of Regulation 2019/34 in line with the requirements of the OCR.

Main steps of GI/TSG controls



Source: DG AGRI own elaboration

4.1.1 Entering the GI/TSG system: Registration of GI/TSG producers

To facilitate controls, Article 39 (for GIs) and Article 72(4) (for TSGs) of the Regulation (EU) 2024/1143, for wines covered by GIs Article 116(a) (3) of Regulation (EU) 1308/2013, outline that each operator wishing to participate in any activity covered by the product specification of a product designated by a geographical indication/TSG shall notify the competent authorities, delegated bodies or natural persons. Member States shall draw up and keep up to date a **list of operators** who perform activities subject to one or more obligations provided for in the product specification of a GI/TSG product originating in their territory.

4.1.2 Controls before the product is put on the market (operator level control)

The controls prior to the placement of products on the market involve checking that they comply with the product specification and relevant legislation

Own controls by producers

Producers or operators (hereinafter together in this section: producers) are responsible for own controls that **ensure compliance with the product specification of GI/TSG products** before the product is put on the market.

“Own controls” are referred to in the Official Controls Regulation, specifically in Article 9(1)(d) and Article 26(1)(b) of Regulation (EU) 2017/625. These controls are carried out **by the producers before the product is placed on the market**, with the aim of ensuring compliance with the product specification of the relevant GI or TSG. Producer groups may support their members with their own controls to verify and ensure such compliance with the product specification concerned.

Example

In practice, **own control by producers** can be implemented by the following methods:

- implementation of ISO certification systems,
- exercises for traceability,
- internal audits,
- external consultants,
- quality control of the final product before being released
- checks of suppliers/ cooperation with suppliers

While own controls form part of the general requirements of the official controls framework, they do not constitute official controls themselves, nor can they replace them.

In case of established non-compliance, the CA/DB/NP may order – amongst others- the producer to increase the frequency of its own controls (Article 26 for DB/NP and Articles 137-138 of OCR for CB).

Example: Focus on Germany

In Germany, for products with a large number of small and micro-producers or operators, the **'Bündlerkontrolle' system** has proven to be a complement to the producers' own control system. In an audit, the Commission referred to this „Bündlerkontrolle” as a 'best practice example', in particular for the production of semi-finished products (e.g. distillates for "*Schwarzwälder Kirschwasser*" spirit drink GI).

The 'Bündler' may be an operator or an outsider and may, for example, carry out the following tasks:

- provide control systems for self-monitoring to the operator,
- process, maintain and transmit to the official control bodies data obtained in the course of self-monitoring by operators, in particular in the case of non-compliances detected; and
- in addition to the own controls of operators and the checks of control bodies, carry out internal checks and make the data obtained therefrom available to operators and control bodies.

This system enables official controls to be carried out at reasonable frequency and at reasonable costs for small and micro-producers/operators. On the other hand, without the 'Bündler', many small and micro-producers/economic operators would no longer be able to participate in the system of agricultural geo-protection, as the costs involved would exceed the economic added value.

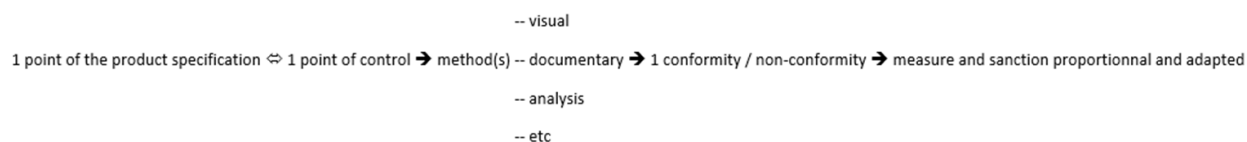
Producer groups are free to put in place **internal control** rules; they have the free choice on how to carry them out. They must ensure they have adequate human and technical resources and put in place procedures for this purpose. Producer groups do not have to be accredited for performing internal controls. Such internal control rules **cannot substitute or replace either official controls and/ or own controls**. The official control tasks remain under the remit and responsibility of the competent authorities and/or delegated bodies and/or natural persons to which certain control tasks have been delegated. Meanwhile however the responsibility of the products placed on the market, and therefore of own controls, remain with the producers.

Verification of compliance by the competent authorities (or by delegation)

In addition to the own controls by the producers, **prior to placing the product on the market, official controls** are performed by the **competent authorities** (CA) or delegated bodies (DB) or natural person (NP), who shall carry out verification of compliance with the product specification. In accordance with Article 9(4) of the OCR, official controls shall be performed **without prior notice**, except in cases where such notification is necessary and duly justified for the official control to be carried out. CA/DB/NP may arrange onsite visits during a specific time frame in order to ensure that controls are carried out during crucial stages of production (in cases of short production cycles, where production takes place only during limited period of time and depends on natural factors, e.g. production of rose oil or rose petals jam; entry of grapes into the winery etc.). In the case where official controls are performed upon request from the operator, the CA may decide whether the official controls are performed with or without prior notice (in accordance with Article 9(4) of the OCR).

The **product specification** is the basic document for controls. The clear and precise rules presented in the product specification increase the effectiveness of controls by limiting the scope for ambiguities and interpretation by CA/DB enforcing compliance with the provisions of the specification. The relevant criteria covering the full production and processing chain are set out in the product specifications and should be “controllable” i.e. based on concrete analytical/organoleptic features and/or resulting from concrete production process and if relevant from specific raw materials.

Schematic overview of the Concept of GI/TSG controls

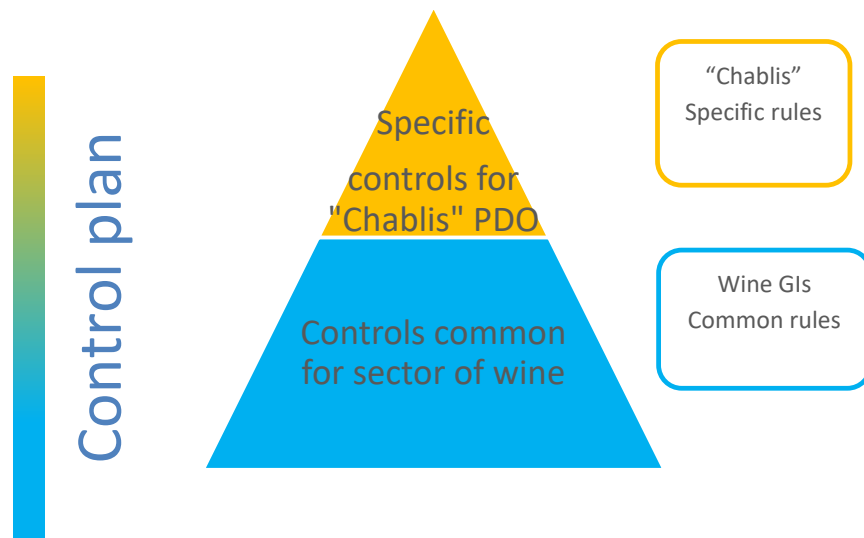


Concept of controls

Source: DG AGRI elaboration in cooperation with INAO (France)

Controls before placing the GI/TSG product on the market are normally based on a **control plan**, a document which specifies how the requirements of the product’s specifications are verified. Generally, it details the conditions for verification of compliance with product specifications, the frequency of the controls, the procedures etc.

Schematic example of a Control plan based on common rules for sector products (France)



Source: DG AGRI elaboration in cooperation with INAO (France)

This **control plan**, approved by CA based on the specification, describes the modalities of controls adapted to the product type. This includes in particular:

- the categories of **operators** (per activity)
- identification of operators (how the operator notifies the competent authority; verification of the operator's ability to comply with the product specification)
- **key points** to control
- **how** each aspect of the specifications is controlled (e.g. detailed in procedures and technical instructions, and evaluation questionnaire)
- **frequency** of controls (for example: systematic, risk based or sampling), taking into account seasonality of production, where relevant
- control **methods** (documentary and physical), including analytical, organoleptic controls on the product, if applicable
- **how the use of the protected name is controlled** in product presentation (including labelling), advertising, documentation, etc. in the physical and online market. In products with GI and in others that may also be produced by the operator, without GI rights
- **non-compliances** and respective measures.

The control plan may include the verification of own controls by the producers and voluntary internal controls by the producer group. The part of the control plan relating to such voluntary internal control can be constructed according to the rules established for

the official controls, even if internal controls do not constitute official controls and cannot replace them.

Example: Focus on Italy and Spain

- To standardize the preparation of control plans for specific GI production sectors, Italy has adopted a series of guidelines to enable control bodies to achieve the goal. The guidelines have been issued for the following sectors: fruit and vegetables, processed meat, olive oil, spirit drinks and cheese.
- Due to Spain's administrative structure, due to the system of Autonomous Communities, there are many CAs. Some of them have harmonised controls for all their geographical indications and others have not, but all of them verify the control procedures of delegated bodies and natural persons before delegating to them. Likewise, periodic audits are carried out to check that they are effective in verifying compliance with the specifications by the operator and, if not, they are required to be modified.

The control plan procedure should include, if necessary, the collection of an official sample of the final product to test for physical-chemical parameters and, where appropriate, another official sample should be taken for the analysis of the organoleptic description in the product specification.

Example

For PDO cheeses, not only production level, but also the origin of raw milk and feed (farm level) need to be controlled. For some PDO cheeses the storage of milk suitable for the PDO cheese production and the separated storage of 'normal' milk is also to be checked.

Regarding PDO wines, once they have been produced, they are sampled to check that they comply with the limits for alcoholic strength, total acidity, volatile acidity, sulphur content and sugars, as well as describing their visual, olfactory and taste characteristics.

Official controls: Verification of compliance with the product specification at operator level

Checking documents:

Weighting tickets, delivery notes, invoices, production declarations, registers of production, traceability records, official books, records (e.g. land area, industries, health packers) and other relevant documents.



On-the spot checks:

Raw materials (e.g. variety, production yield, breed, feed etc.)

On the spot measurements (temperature, size, colour, Brix etc.)

Balance of masses (inputs/ outputs => yield)

Final products stocked (bulked and packed), labelling

Traceability exercise



Sampling:

Chemical/ organoleptic assessment of both the raw materials and final products



Source: DG AGRI own elaboration based on BTSF training materials

What to look when conducting pre-market controls?

- Established control plan for the GI/TSG (in some MSs, like Italy or Spain), this is agreed upon between the producer group and the CA: Control process and checklist based on the product specification
- Obligatory documents (for example that the operator and its facilities or raw material production area are registered in the official registers and in those of the GI/PGI; that it has HACCP (Hazard Analysis and Critical Control Points) in place, and that the official production records are available and up to date.)
 - Demarcated area: administrative zones, if relevant
 - Registers of production
 - Registers of suppliers: origin of the raw materials/ingredients, delivery notes, invoices, batches
 - Input/output balance: raw material input, processed product output (e.g. Record of processing yield, if this is limited in the product specification.
- Evidence of compliance with the requirements of products and processes, according to the provisions of the control plan established according to the product specification (e.g. varieties, breeds, temperature, equipment, storage, slicing, grating, geographical area, methods of harvest/crop, the length of each production process's step)
 - Complete traceability (e.g. use of plaques, labels, bar code etc.)
 - Where relevant: restrictions on grazing, feed and/or milk management
 - Product characteristics (e.g. sampling for analysis)

Source: BTSF training materials

Specific control rules for spirit drinks GIs

As regards spirit drink GIs the provisions on controls of the OCR and the Regulation (EU) 2024/1143 are applicable.

Article 43 (1) of the Regulation (EU) 2019/787 (the spirit drinks regulation) solely confirms that Member States are responsible for checks on spirit drinks.

Specific control rules for wine GIs

When performing the checks on GI wine products, the responsible competent authorities and delegated bodies shall comply with the principles laid down in the OCR.

In particular, for the competent authorities responsible for verifying compliance with the GI specifications, Articles 4(2) and (4) and 5(1), (4) and (5) of the OCR apply. And for the delegation to such bodies, the criteria laid down in Articles 28-33 of the same Regulation must be met. Where specific control arrangements are included in the Regulation (EU) No 1308/2013 and the associated legislation, these specific rules apply.

The delegated bodies²³ shall comply with and be accredited for the delegated tasks in accordance with the Standard EN ISO/IEC 17065 or Standard EN ISO/IEC 17020.

Example: Focus on Cyprus

As regards wine GIs the following control procedure is followed:

1. Certification procedure

- The competent authority has established a list of operators/wineries eligible to produce wines with a registered GI name. (Art. 45 (1)(b) of Regulation (EU) 2024/1143).
- All eligible wines to bear a GI apply for a certificate/ attestation of compliance. If the relevant wine complies with the requirements of the EU and national laws a certificate is provided (Art. 45 (1)(a) of Regulation (EU) 2024/1143).

2. Control procedure:

- A control procedure is established at the production level based on a control plan according to specific factors (wineries with big GIs production, control on all GIs established for CY).
- Control on the market based on a risk assessment, targeted checks and randomly.

²³ Article 15(3) of Regulation 2019/34

Similarly to the agricultural sector, in general, a control procedure is established at production level normally based on the control plan established based on specific factors (e.g. economic importance of the GI). In case non-compliance with the product specification is detected, the GI name cannot be used on the wine.

However, only the wine legislation requires **annual verification of compliance with the product specification**, during the production phase and during or after conditioning of the wine (Article 116(a) of Regulation (EU 1308/2013 and Implementing Regulation (EU) 2019/34, in particular Article 19).

The annual verification shall:

- (a) Consist of an organoleptic and analytical testing for products bearing a PDO;
- (b) Consist of either analytical testing only or both organoleptic and analytical testing for a PGI
- (c) Consist of checking compliance with the other conditions set out in the product specification

The tests referred to in points (a) and (b) shall be carried out on **anonymous samples** taken at any stage of the production process and, where appropriate, at the packaging stage. Each sample taken shall be representative of the wines concerned held by the operator.

When carrying out the checks referred to in point (c), an on-site inspection shall be carried out at the operators' facilities to verify that the operators can actually meet the conditions laid down in the product specification; checks shall be carried out on products at any stage of the production process and, where appropriate, at the packaging stage, on the basis of an inspection plan covering each stage of production of the product, drawn up in advance by the control authority and of which the operators are aware.

It shall be carried out through one or more of the following methods (Article 19 of Implementing Regulation 2019/34):

- **through random checks based on a risk analysis;**
Where Member States opt to conduct random checks, they shall select the minimum number of operators to be subjected to those checks.
- **through sampling;**
Where Member States opt to conduct sampling, they shall ensure that by the number, nature and frequency of controls, the sampling is representative of the whole of the demarcated geographical area in question and corresponds to the volume of wine-sector products marketed or held with a view to their marketing.
- **systematic checks**

The annual verification shall be conducted in the Member State, in which production takes place in accordance with the product specification. In the case of a protected **trans-border PDO/PGI**, the verification may be performed by a control authority of either of the Member States concerned.

Any product failing to meet the conditions specifically set for given PDO/PGI may be placed on the market, but without the right to indicate relevant PDO/PGI, provided that the other legal requirements are satisfied.

Annual verification may be carried out at the **packaging stage of the product**, in the territory of a Member State other than the Member State in which the production took place, in which case the provisions on mutual assistance, as set forth in Article 43 of Delegated Regulation (EU) 2018/273 apply.

Competent authorities or delegated bodies of different Member States responsible for carrying out checks on a PDO/PGI shall cooperate to ensure that all the operators established comply with the applicable packaging obligations, as set forth in a given product specification.

Both the **analytical and organoleptic testing** shall:

be performed (Article 19(2) of IR 2019/34):

- be carried out on anonymous samples
- demonstrate that the product tested complies with the characteristics and qualities described in the relevant PDO/PGI specification.
- be carried out at any stage of the production process and, where relevant, at the packaging stage.
- each sample taken must be representative of the relevant wines held by the operator

consist of (Article 20 of IR 2019/34):

- a physical and chemical analysis of the wine in question

Measuring the following properties:
(i) total and actual alcoholic strength, (ii) total sugars, expressed in terms of fructose and glucose (including any sucrose, in the case of semi-sparkling and sparkling wines), (iii) total acidity, (iv) volatile acidity, (v) total sulphur dioxide

- an additional analysis of the wine in question

Measuring the following properties:
(i) carbon dioxide (overpressure, in bars, at a temperature of 20 °C, in semi-sparkling and sparkling wines), (ii) any other characteristic property provided for in the regulations of the Member States or in the product specification

- an organoleptic test covering the visual appearance, smell and taste.

According to Article 146 (1) of Regulation (EU) No. 1308/2013 the **designated laboratories** shall satisfy the general criteria for the operation of testing laboratories set out in ISO/IEC 17025.

Example: focus on Spain

In Spain, operators making use of the GI name, for agricultural and wine products and for spirit drinks receive at least one audit per year and for raw material suppliers they are systematically carried out at a percentage based on certain factors such as non-compliance, production volume, etc. The check can be documentary, identification and physical.

The control techniques are specified in the control, surveillance, verification, audit, inspection, sampling and analysis activities carried out, for each of the control points identified, at all stages of production, preparation, processing, packaging and labelling prior to the placing on the market of the products covered by the corresponding PDO/PGI/GI/TSG, in order to verify compliance with the product specification.

In accordance with the established procedures, the **minimum checks** that are carried out for verification of the product specification are as follows:

1. Review of the self-monitoring put in place by operators and suppliers of raw materials, where appropriate.
2. On-the-spot check of control points.
3. Control of the origin and characteristics of the raw materials and control of ingredients and processing aids included in the specification.
4. Control of production or processing
5. Traceability control
6. Analytical and, where appropriate, organoleptic control of the product (with sampling and analysis).
7. Control of movements of products in the demarcated area
8. Monitoring of packaging and labelling
9. Stock control and mass balance

Specific control rules for TSGs

In addition to the own controls by the producers, prior to placing the product on the market, official controls are performed by the competent authorities (CA) or delegated bodies (DB) or natural persons (NP), who shall carry out verification of compliance with the product specification.

The **product specification** is the basic document for controls. The TSG control includes the same steps as the PDO/ PGI controls - it is a check for compliance with the specification and should include all the requirements from the specification in the checklist.

In case of TSG products it is verified in particular regarding the **key elements establishing the product's traditional character**.

During verification of compliance CA/DB/ NP confirm that product is produced:

- in accordance with traditional method of production, processing
- has composition corresponding to traditional practice for that product or foodstuff
- if raw materials or ingredients used in the production are traditional.

TSG's control specific issues:

- Final product including its main physical, chemical, microbiological or organoleptic characteristics (showing the products' specific character)
- production methods, including, where appropriate, the nature and characteristics of the raw materials or ingredients used, and the method by which the product is prepared
- The key elements establishing the products' traditional character.²⁴

The delegated bodies (Title II, Chapter III of the OCR)²⁵ and for third countries the certification bodies (CB) shall comply with and be accredited for the delegated tasks in accordance with the Standard EN ISO/IEC 17065 or Standard EN ISO/IEC 17020.

Enforcement actions including penalties

General rules on enforcement measures are outlined under the OCR (Articles 137-140) and detailed under *Section 5*.

Example: Sanctions in premarket controls

Member States comply with the general obligation to provide for an administrative sanction system for GI users not complying with product technical specifications (including precautionary measures) in the form of fines and marketing or processing prohibitions. Categorisation and classification of administrative fines are diversely provided for by the national systems.

(Source: https://www.origin-gi.com/wp-content/uploads/2017/12/EUIPO_Geographical_Indications_full_report_EN_.pdf)

4.1.3 Controls in post-production steps

In some cases, the **product specification** includes some rules for the **post-production** steps, such as *slicing, grating, packaging, bottling* of GIs within or outside of the geographical area. These steps are **carried out before placing the product on the market** for agricultural

²⁴ Guide on practices of official controls in scope of GI/TSG agri-food products in the EU (https://agepi.gov.md/sites/default/files/ipr_project/Final_GUIDE_on_OFFC_in_scope_of_PDO_PGI_TSG_08.09.18_EN.pdf)

²⁵ Article 41(1) of Regulation (EU) 2024/1143

products, wines and spirit drinks. Those steps may take place outside the geographical area or in some cases even outside the Member State of origin.

The control of packaging, slicing, grating, bottling is particularly important if it is done outside the geographical area indicated in the product specification. In this situation, there is a greater likelihood of losing traceability and specific product's "quality" can be affected because not always there is enough know-how to deal with each specific product.

The general control rules that apply are the same:

- Member State's concerned designated competent authority responsible for official GI controls should act.
- the duty of cooperation (framework of the mutual assistance) - e.g. where slicing/ grating/ packaging/ bottling is checked by different control authorities, for the purpose of effective collaboration, they shall exchange information on the operations under their control.
- the principle of the territoriality (which also governs the protection of intellectual property rights).

As far as the competent authority is concerned, it has to be distinguished between two situations:

- If there are **any specific rules** concerning slicing, grating, packaging etc. included under the respective section of the product specification (and single document), that Article 39(5) of Regulation (EU) 2024/1143 and Article 19(1) of Regulation 2019/34 apply (official controls covering **verification of compliance with the product specification**). In this case, the competent authority of the area in which the operation takes place has to ensure the control of the mentioned activities, regardless of if it is the country of origin of the geographical indication or not.
- If there are **no specific rules** concerning slicing, grating, packaging or labelling etc. included under respective section of the product specification and single document, only the appropriate labelling and mass balance shall be checked in case the product is placed on the market with the relevant GI name. However, if the authorities are made aware of a suspected fraud involving a GI label, at any step, including post-production, transport or retail, they should intervene in accordance with the general principles of food law and mutual assistance principles (Articles 44 and 76 of Regulation (EU) 2024/1143 in accordance with Title IV of the OCR and for wines also Article 43 of Regulation 2018/273).

If a product bearing a GI is packaged, grated or sliced in another Member State, the competent authority of that Member State has to perform checks related to activities taking place on its territory. It can do so by itself or delegate them to a control body.

Example on specific packaging rules: focus on Italy

Fungo di Borgotaro PGI shall be packaged in a special way: „a net with a sealed bandage inserted must be affixed to the container in such a way as to prevent the content can be extracted without breaking the seal”.

Source: BTSF Training materials



Example of bulk control: focus on Spain

In Spain, during the bottling phase, there is an agreement on the verification, of compliance with the specifications for PDO or PGI wines., when this phase is carried out in other EU Member States or in a third country.

According to this agreement, all exports of bulk wine covered by a Protected Designation of Origin or Protected Geographical Indication to other EU Member States or third countries shall be communicated by the competent authority to the Ministry of Agriculture, Fisheries and Food.

The documents to be sent are as follows:

- Contact details of the packager at destination;
- Volume of wine shipped in bulk;
- Requirements established in the specifications of that PDO/PGI verifiable at the packaging stage;
- Explanatory guidelines on the activities necessary to verify these requirements;
- Intra-Community accompanying document, from which the consignment, type of wine and volume can be obtained;
- Laboratory analysis report or self-assessment of the same consignment of wine;
- Certificate of origin of the consignment of wine.

4.1.4 Attestation of compliance

Regulation 2024/1143 establishes rules regarding the attestation of compliance with the product specification for agricultural products, spirit drinks and wine GIs (Article 45) and for agricultural products, including foodstuffs TSGs (Article 77). When an operator's product is verified to comply with the relevant product specification, they are entitled to receive either an **attestation confirming compliance** or be included in a **list of approved operators established and maintained by the competent authority**. This shall be provided upon request by the producer and shall be made available online to each approved operator. This attestation of compliance and the listing shall be updated according to the outcome of the controls. Nevertheless, the issuing of the attestation of compliance does not exempt the operator from post-production checks.

The certificate/ inclusion in a list of approved operators established by the competent authority is a formal guarantee that the product was produced in compliance with the product specification and may be labelled with a protected name (PDO, PGI, TSG). This document is also important from consumers' confidence point of view.

The attestation of compliance document or reference to the list of approved operators established by the competent authority can be used by operators to demonstrate in various contexts that they are authorised to use a protected GI/TSG name and EU logo (e.g. during market inspections, customs controls, etc.)

4.1.5 Controls in the market verification of the use of the protected names

Market controls are essential for enforcing the protection granted to GIs. The controls ensure that the registered GI name is used exclusively by producers who comply with the product specification established for the GI product. (*Explanation on protection measures are in Section 2*)

The purpose of market controls is to **ensure compliance with the OCR**, as well as to ensure that the **information provided to consumers is reliable** (labelling, composition, etc.) according to Article 7 of the FIC regulation²⁶ and to ensure the **protection of the registered name** attached to GIs/TSGs. Controls are carried out at all stages of the chain after the GI product has been placed on the market as indicated in Article 42(1) regarding GIs and 72(1) for TSGs by the Regulation (EU) 2024/1143, (import/export, storage, transit, distribution or offering for sale, including in electronic commerce and catering). These controls can reveal fraud, deception, as well as simple labelling errors.

In this way, market controls protect the **integrity of the GI system** itself, shielding both producers and consumers from deception and maintaining the distinctiveness and value of the registered name.

²⁶ 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

Article 42(2) of Regulation (EU) 2024/1143 specifies that competent authorities responsible for verification of, and enforcement actions on, the use of geographical indications after the product designated by a geographical indication has been placed on the market, shall regularly and with appropriate frequency based on risk analysis and on notifications received, including from producer groups, act to ensure compliance with the product specification or with the single document or an equivalent to the single document for the geographical indication concerned, including in online presentations and labelling.

Provisions of the Regulation 2024/1143 (Articles 42 and 43 for GIs and Articles 74-75 for TSGs) regarding the **verification of the use of the registered name in the market** and “illegal content” concerning on the online market is applicable for agricultural products, wines and spirit drinks.

Example: elements of market controls

- Presentation/ appearance of the product
- Labelling aspects
- Composition of the product (including raw materials if relevant)
- Restrictions: for example, if it has been sliced, grated or portioned outside the geographical area

Based on the product specification and relevant legislations.

Member States shall designate one or more **competent authorities** responsible for verification of, and enforcement actions on **the use of the registered name** after the product designated by a geographical indication or by TSG has been placed on the market (Article 42(1) and Article 74(1) respectively of Regulation (EU) 2024/1143 in accordance with Article 4 of the OCR).

Competent Authorities do not have to be accredited, but must present guarantees in the field of PDO/PGI/GI/TSG regarding:

- *Impartiality: the advisor is not the controller*
 - *Sufficient number of suitably qualified and experienced staff on PDO/PGI/TSG*
 - *Documented procedures*
 - *Facilities and equipment*
 - *Legal powers to carry out PDO/PGI/TSG controls*
 - *Internal or external audits*
-

Controls by the competent authorities

The verification of the **use of the registered names** occurs after the GI/TSG product has been placed **on the market**. Member States' authorities shall, regularly and with appropriate frequency, based on risk analysis and on notifications received, including from producer groups, undertake actions to ensure compliance with the product specification, including in online presentations and labelling.

GIs with a high sales value are more likely to be subject of fraud on the market.

Top 10 GIs (alphabetical order)²⁷ - 10 GIs with the highest potential for fraud based on their sales value

GI name	GI type	Product	Country
Bayerisches Bier	PGI	beer	Germany
Cava	PDO	wine	Spain
Champagne	PDO	wine	France
Cognac	PGI	spirit drink	France
Grana Padano	PDO	cheese	Italy
Parmigiano Reggiano	PDO	cheese	Italy
Pays d'Oc	PGI	wine	France
Prosciutto di Parma	PDO	cured ham	Italy
Rioja	PDO	wine	Spain
Scotch Whisky	PGI	spirit drink	United Kingdom

The top 10 GIs represent 28% of the sales in EU. Third country GI product sales in the EU are dominated by a few products, such as Café de Colombia (coffee, Colombia) and Tequila (spirit drink, Mexico).

Member States shall take appropriate enforcement and judicial measures to prevent or stop the use of names of products or in relation to services, supplied or marketed on their territory, or intended for export to third countries, including in online interfaces, that infringe upon the protection of GI/TSG name.

²⁷ INFRINGEMENT OF PROTECTED GEOGRAPHICAL INDICATIONS FOR WINE, SPIRITS, AGRICULTURAL PRODUCTS AND FOODSTUFFS IN THE EUROPEAN UNION- EUIPO- 2016 https://euiipo.europa.eu/tunnel-web/secure/webdav/guest/document_library/observatory/documents/Geographical_indications_report/geographical_indications_report_en.pdf

Example: Focus on Spain

In Spain producer groups monitor the physical and online markets to detect the misuse of the registered names and report it to the competent authorities. A number of Regulatory Councils have unofficial arrangements for market surveillance to share information in case of irregularities on the market.

BTSF Illegal use: examples

Real



Parmigiano Reggiano
PDO

1

Fake



Similar
name

Italian
word
«Vecchio»

Italian flag



BTSF Illegal use: examples



Real



Fake



Source: BTSF training materials

Every Member State is a marketplace not only for its own products bearing protected GI/TSG names, but also for the GI/TSG products coming from other Member States or non-EU countries. Therefore, controls on the market should cover all PDO/PGI/GI or TSG protected in the EU, which includes the ones from third countries registered in the Union Register or protected under trade agreements. To facilitate market controls of GIs in all Member States, the product specification shall be accurately summarised in the single document, which is published in the Official Journal of the EU in all official EU languages.

Role of the GI/TSG producer groups

Regulation (EU) 2024/1143 empowers producers to carry out certain monitoring tasks (Article 32 and Article 55). In this context, producer groups are enabled to address infringements and suspected fraudulent uses on the markets of GI products that are not in compliance with the product specification, by **monitoring and verifying the use of the geographical indication across the internal market and on third country markets** where the geographical indications are protected, including on online platforms, and, as necessary, inform enforcement authorities using confidential systems where available.

Likewise, TSG producer groups can take measures to prevent or counteract any action detrimental to the image of their products.

Practices as regards market surveillance can be:

- *During commercial exhibitions,*
- *Information given by clients/partners/employees etc.*
- *Information given by employees who place their products on the shelves,*
- *Unofficial on-site inspection in supermarkets,*
- *Unofficial internet research.*

If any fraud is detected, the producers inform immediately the CA.

Example: Focus on Italy, Spain and France

- In Italy, market surveillance activities of consortia (Italian recognised producer groups) are regulated in national legislation. As regards the e-commerce, foreign electronic markets are subject to a constant monitoring by ICQRF, with the structured collaboration of the Consortia.
- In Spain, a number of Regulatory Councils have unofficial arrangements for market surveillance to share information in case of irregularities on the market.
- In France the protection of GIs is a shared task between producer groups and INAO (l'Institut national de l'origine et de la qualité; National Institute of origin and quality)

4.8 What to look for on the packaging of a GI/TSG product?

4.8.1 General food labelling rules

Food products placed on the Union market shall comply with the presentation and labelling requirements set out in the FIC regulation (Article 7), providing the general framework on the information on food for consumers including labelling rules.

Food which is placed on the market or is likely to be placed on the market in the EU must be adequately labelled or identified to facilitate its traceability, through relevant documentation or information.

As far as checks on labelling are concerned, in Article 1(2)(j) provides that the OCR shall apply in the area of “use and labelling of protected designations of origin, protected geographical indications and traditional specialities guaranteed” for agricultural products and spirit drinks.

For wines, the provisions of the OCR applies to checks pursuant to Article 90a of Regulation 1308/2013 where those checks identify possible fraudulent or deceptive practices in respect of the marketing standards referred to in Articles 73 to 91 of Regulation 1308/2013 (Article 1 (4) (a) of the OCR). Pursuant to Article 90a, Member States shall take measures to ensure that products referred to in Article 119(1) which are not labelled in conformity with this Regulation are not placed on the market.

4.8.2 Labelling rules for GIs and TSGs



PDO

Protected
Designation of
Origin



PGI

Protected
Geographical
Indication



GI

Geographical
Indication



TSG

Traditional
Speciality
Guaranteed

Source: DG AGRI own elaboration

Specific labelling rules regarding GIs stem from Regulation (EU) 2024/1143 (Articles 37 and partly 27) and the Implementing Regulation 2025/26 (Article 34) as well as the CMO Regulation (EU) 1308/2013 (Articles 119(1)(b) and (3) and 120(1) d, e, g, h) and (2)) and Commission Delegated Regulation (EU) 2019/33 (Article 23) regarding wines and Regulation (EU) 2019/787 (Articles 12, 13(6), 14 and 15) regarding spirit drinks, constituting different labelling rules for each sector.

The indications ‘PROTECTED DESIGNATION OF ORIGIN’, ‘PROTECTED GEOGRAPHICAL INDICATION’ and ‘TRADITIONAL SPECIALITY GUARANTEED’ within the symbol may be used in any of the official languages of the Union as laid down in Annex XVII of the Implementing Regulation 2025/26.

4.8.3 The use of Union symbols, indication and abbreviations for GIs

Indications, abbreviations and symbols referring to geographical indications shall not be used other than in connection with products produced in compliance with the relevant product specification. They may also be used for information and educational purposes, provided that such use is not likely to mislead the consumer.²⁸

- **Obligatory use of the EU logos for agricultural products originating in the Union**, notably the symbol identifying protected designations of origin and the symbol identifying protected geographical indications. The indications ‘protected designation of origin’ or ‘protected geographical indication’ or abbreviations ‘PDO’ or ‘PGI’ may appear on the labelling and advertising material.
- **Optional use of the EU logos for wines**, notably the symbol identifying protected designations of origin of agricultural products and the symbol identifying protected geographical indications; use of the indications "protected designation of origin" or "protected geographical indication" is mandatory: they shall appear on the labelling (these may be replaced by traditional terms registered at EU level pursuant to Article 119(3)(a) CMO). The abbreviations ‘PDO’ or ‘PGI’, corresponding to the indications ‘protected designation of origin’ or ‘protected geographical indication’ may appear in the labelling.
- **Optional use of the EU logo for spirit drinks GIs**, the symbol identifying protected geographical indications; the term „geographical indication” may appear in the labelling.

For agricultural products, the geographical indication shall appear in the same field of vision²⁹ as the Union symbol. If the symbol is voluntarily used on wine and spirit drinks GI it shall also appear in the same field of vision of the GI. Optional other elements on the labelling may be depictions of the geographical area of origin; and text, graphics or symbols referring to the

²⁸ EU logos may be downloaded: https://agriculture.ec.europa.eu/farming/geographical-indications-and-quality-schemes/geographical-indications-and-quality-schemes-explained_en#logos

²⁹ ‘field of vision’ means all the surfaces of a package that can be read from a single viewing point according to FIC regulation Article 2(2)(k)

Member State and the region in which that geographical area of origin is located provided that such references do not mislead the consumer as to the true identity or origin of the product.

Where the Union symbols, indications or corresponding abbreviations appear on the labelling of a product, they shall be accompanied by the registered name.

In view of the objective of the GI Regulation, the GI symbol, when used, must appear in a conspicuous place³⁰ of the front label.

In addition, **sector specific labelling** rules exist for wines and spirit drink GIs.

As regards **specific labelling rules related to wines**, the CMO regulation (Article 119 (1)) lists the **compulsory particulars** to be present on the labelling, stemming from the specific wine production rules (for example actual alcoholic strength, indication of provenance, producer/bottler); in addition Articles 40-48(a) of Delegated Regulation of 2019/33 apply. Article 120 (1) lists the **optional particulars** regulated (for example vintage year, name of one or more grape varieties, terms referring to certain production methods); in addition, Articles 49-55 of Delegated Regulation of 2019/33 apply. The label may also include traditional terms registered at EU level ³¹.

Example: Focus on Spain and France

Guide to compulsory and optional terms on the labelling of Rioja PDO wines:
<https://riojawine.com/wp-content/uploads/2023/04/guia-info-etiqtdo-enero-2023.pdf>

A practical guide on wine labelling in France is available on the Directorate General for Competition, Consumer Affairs and Fraud Control (DGCCRF) of the Ministry of Economy website:
<https://www.economie.gouv.fr/dgccrf/les-fiches-pratiques/etiquetage-des-vins-savoir-lire-les-etiquettes>

³⁰ Article 13(1) of FIC regulation

³¹ <https://ec.europa.eu/agriculture/cambrosia/geographical-indications-register/tdt>

In addition, the product specifications **may** contain **additional labelling rules** depending on the production and marketing of the product. *For example:*



Source: internet³²

Concerning **spirit drinks**, specific labelling rules are included in the Regulation (EU) 2019/787 (Articles 10-15) stemming from the specific spirit drink production rules. These rules also include, amongst others that prescribes that in the description, presentation or labelling of a spirit drink (so also a spirit drink with a GI) a maturation period or age may only be specified where it refers to the youngest alcoholic component of the spirit drink and in any case provided that all the operations to age the spirit drink took place under revenue supervision of a Member State or supervision providing equivalent guarantees (Article 13 (6)).

In addition, a *Guidelines for the implementation of certain labelling provisions* of Regulation (EU) 2019/787 of spirit drinks is available with the purpose to ensure its uniform application as concerns certain labelling provisions.³³

³² <https://www.wine-searcher.com/wine-label-france>

³³ Commission Notice- Guidelines for the implementation of certain labelling provisions of Regulation (EU) 2019/787 of the European Parliament and of the Council of 17 April 2019 on the definition, description, presentation and labelling of spirit drinks, the use of the names of spirit drinks in the presentation and labelling of other foodstuffs, the protection of geographical indications for spirit drinks, the use of ethyl alcohol and distillates of agricultural origin in alcoholic beverages, and repealing Regulation (EC) No 110/2008 (2022/C 78/03)- [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022XC0218\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022XC0218(01))



Source: internet³⁴



Source : internet³⁵

4.8.4 The use of Union symbol, indication and abbreviation for TSGs

Specific labelling rules regarding TSGs stem from Regulation (EU) 2024/1143 (Article 70).

The indication ‘traditional speciality guaranteed’, the abbreviation ‘TSG’, and the Union symbol referring to the traditional speciality guaranteed may only be used in connection with products produced in compliance with the relevant product specification. They may also be used for information and educational purposes, provided that such use is not likely to mislead the consumer.

Obligatory use of the TSG logo for agricultural products originating in the Union that are marketed as traditional speciality guaranteed registered, notably the symbol identifying ‘traditional speciality guaranteed’. The indication ‘traditional speciality guaranteed’ or the corresponding abbreviation ‘TSG’ may appear in the labelling.

4.8.5 Labelling aspects when GIs are used as an ingredient

Labelling must ensure that consumers are not misled as to the nature, identity, properties and consumption of the product, in particular when GIs are used as an ingredient in a processed product.

Indications and abbreviations of a GI used as ingredient of a processed product may be used in the labelling and advertising material, or in the list of ingredients, of such processed products (Article 37(7) of the Regulation (EU) 2024/1143. In that case, the indication or abbreviation shall be placed next to the name of the ingredient that is clearly identified as an ingredient. The

³⁴ <https://wildeshausen.zischexpress.de/products/rosche-haseluenner-korn-32-0-701>

³⁵ <https://insidethecask.com/2018/05/04/what-should-a-scotch-whisky-label-tell-us/>

Union symbol shall not be used on the processed products to avoid associating it with the name of the food.

4.8.6 Labelling rules for unpacked or loose products

Labelling rules defined in Article 37 (3) of the Regulation (EU) 2024/1143, also apply to the labelling of GI products, whether prepackaged or packaged at the point of sale. Therefore, even if the GI product is non-prepackaged, but it is handed to the customer in the wrapper that indicates the GI name, the Union symbol must be used in accordance with the Article 37(3), and it shall appear within the same field of vision as the GI name.

If the GI name is not included on the wrapping of a non-prepackaged product handed to the customer, the obligation to display the Union symbol does not apply, as the requirement is linked to the presence of the GI name.

Secondly, when a GI product is presented at a local marketplace or counter (e.g. the sale of fruits, vegetables, cheese, or ham) or marketed online (e.g. in a web shop), the **Union symbol shall accompany the protected GI name** in these contexts as well. For example, the Union symbol should be displayed next to the product name on signs or labels at the counter, and it shall be displayed on the web pages where the GI is promoted or sold and its name is used.

In any event, the name of the producer does not have to be indicated on the wrapping of loose products.

4.8.7 Product specific logos

A product specific logo is not a legal requirement by EU legislation; however, a number of GI products enjoy a product specific logo, with a view to facilitating the identification of the products by the consumers on the market.

In addition, a number of geographical indications benefit from specific labelling requirements due to national control systems or product traceability consisting of numbered guarantee marks or unique labelling numbers for each product unit.

In case the product specific logo or specific labelling provisions are included in the product specification under the labelling rules, it becomes mandatory on the packaging of the GI product and needs to be controlled on the market.

Examples of product specific logos



Examples of specific labelling requirements and guarantee marks



The “Manchego” cheese PDO products must be identified with a numbered back label that includes the specific logo of the designation and a numbered casein plaque. Both are provided by the control body.

In Greece, agricultural products and foodstuffs that bear PDOs or PGIs, it is mandatory to include on their packaging, the following national logos, in addition to the EU logos and the other respective labelling requirements. The mandatory inclusion of the national logo in the labeling of GI products is foreseen in the national legislation.

4.8.8 Presentation of the name of the producer or operator on the label

As regards PDO/PGI **agricultural products**, an indication of the **name of the producer or operator** shall appear in the labelling, in the same field of vision as the geographical indication. In that case, the name of the operator shall be understood as the name of the operator responsible for the production stage at which the GI product is obtained, or responsible for carrying out substantial processing of that product.

Example: presentation of the name of the operator

A packager of grated 'Parmigiano Reggiano', who grates and blends (substantial processing) the product coming from different PDO producers, is allowed to include its own name in the label as 'operator' instead of being obliged to list all the names of the 'Parmigiano Reggiano' producers providing the non-grated products.

Where packaging or containers have as their largest surface area of less than 10 cm² ³⁶, the indication of the name of the producer or operator shall be voluntary.

Agricultural products, which were **labelled before 14 May 2026**, may continue to be placed on the market without complying with the obligation to indicate the name of the producer/operator until existing stocks are exhausted.

4.8.9 Illustration of correct and incorrect examples of GI/TSG labelling

Examples of incorrect labelling

- Absence of EU GI symbol for agricultural products
- Black and white EU GI symbol on coloured packaging
- Incorrect EU GI symbol used on the packaging
- EU GI symbol not next to the GI name on packaging (but on the back of the packaging)
- Not correct GI name presented on packaging (translation, orthography etc.)
- EU symbol size does not comply with regulation

³⁶ Article 16(2) of Regulation (EU) No 1169/2011(FIC Regulation)

Examples of labelling of GI products

Correct labelling



Incorrect labelling



EU symbol is not appearing in a conspicuous place. The principal field of vision, which in practice is the front label is such a place.



EU symbol is not appearing in a conspicuous place. The principal field of vision, which in practice is the front label is such a place.



It prominently uses the name "guijuelo" without having the Guijuelo seal and label, and it is a white ham of TSG "Jamón Serrano"



The labelling refers to the term "Asturiana" and the bean is not produced according to the product specification of PGI "Faba Asturiana".



The labelling refers to PDO "Toro" on a wine that is not produced according to the product specification of "Toro" PDO.



EU symbol is not appearing in a conspicuous place. The principal field of vision, which in practice is the front label is such a place.

Source: DG AGRI and Member States own compilation

Example: Focus on Spain

Spain has a guide for the control of GI products on the market, that is shared with authorities involved in market controls. The guidelines cover both GIs registered by Spain and by other Member States and includes labelling elements that make it possible to identify the products covered on the market (e.g. photos of numbered guarantee marks, specific logo of the IGs, etc.). As regards Spanish GIs these labelling examples are uploaded in the GIview.

5. Enforcement

Under the present Guidelines GI/TSG enforcement is understood as all effective mechanisms helping to protect GI/TSG rights once the products bearing GI/TSG names are placed on the market. From GI/TSG perspective, in case pre-market controls reveal that the product is not in compliance with the product specification, it cannot be placed on the market with the registered name and/or the EU symbol.

Linked to market controls, adequate enforcement actions are available for origin linked names. The rules applicable to enforcement actions can be found in:

- EU legal framework
- MS (national) legal frameworks
- International agreements

The three aforementioned categories provide for an active role played by the public authorities (both of the EU and of MSs) to ensure the respect of the rights deriving from GIs.

At **EU level**, the main administrative rules are set forth in the sector-specific legislation and in the OCR (Title VII). Article 137 of the OCR refers to the general obligations of the competent authorities, in particular Article 137(2) on suspicion of non-compliance. Article 139 of the OCR contains provisions on penalties.

The GI regulation makes a separate reference to the manner in which enforcement actions are to be carried out in the marketplace, and to the steps to be carried out by the Member States in Article 42 (3)-(5) of Regulation (EU) 2024/1143 covering enforcement rules for all the three GI sectors.

Member States shall take appropriate administrative and judicial steps to prevent or stop the unlawful use of GI names of products or services, including on the internet, that are produced, provided or marketed in their territory, or intended for export to third countries.

Unless provided otherwise under **international agreements**, in the EU the enforcement rules for third countries' GIs protected under these trade agreements are provided **directly in the agreements**. The specific international agreements are listed here: https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/negotiations-and-agreements_en

In case there is no bilateral agreement covering the mutual recognition of GIs concluded with a third country, enforcement actions can be taken if the product infringing the EU GI rules is entering into the EU market.

Procedure

In case of finding evidence of misusing and evoking GI names in third countries, a request for the activation of the cooperation procedure can be launched via appropriate procedures.

In practice, this can be done via a notification under the Food fraud system, iRASFF platform managed by DG SANTE or via formal correspondence to the Commission. The Commission services will forward this request to the service responsible for the implementation of international agreement governing the protection of GIs with that specific third country in order to take up the issue on the next negotiations/ committees established for monitoring the implementation of the agreements.

5.1 Categories of enforcement actions

Depending on the legal basis, applicable methods and available measures, the enforcement actions can be divided into:

- Administrative actions
- Civil law actions
- Criminal law actions
- Customs actions

For GIs, an **administrative system of enforcement** is a crucial feature.

Administrative actions can be instigated by the Member States' authorities (*ex officio*) or upon a request of an interested party. However, an active participation of the producers in monitoring of the market can always play an important role and can lead to identification of the situations (e.g. fraud, potential misuses and/or violations), for which administrative actions can be carried out.

Administrative enforcement envisages numerous types of actions, including:

- Actions by the competent authorities necessary to determine the origin and extent of the non-compliance and to establish the operator's responsibilities.
- Measures to ensure the operator concerned remedies the non-compliance and prevents further occurrences of such non-compliance. The measures the competent authorities may take include, but are not limited, to the ones listed in Article 138 of the OCR.
- Investigations. This may result, where necessary, in the performance of intensified official controls for a given period or in the official detention of products, as appropriate.
- Ad hoc actions carried out to ensure correct application of EU GI law (elimination of misuses/infringements of GIs);
- Additional inspections to the non-complied business operators,
- Administrative fines
- Administrative assistance and cooperation.

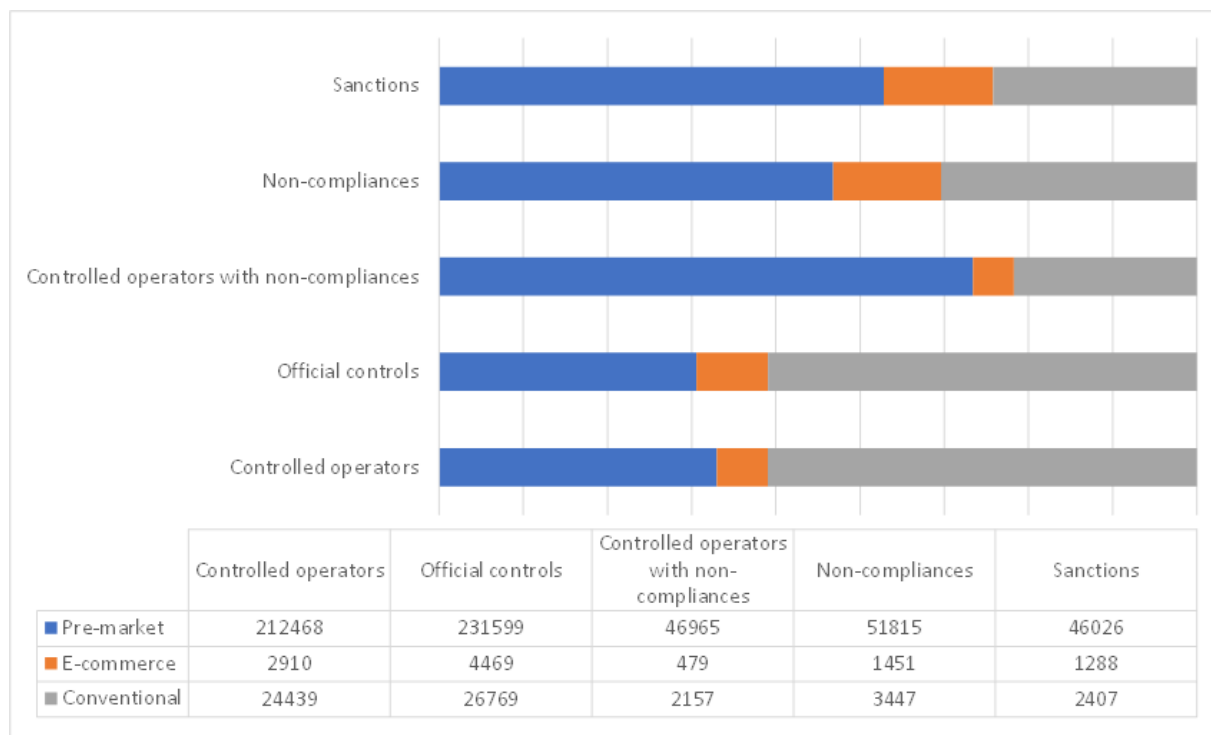
All these actions are available to ensure that consumers are not misled and producers holding the rights in the names are not undercut by non-originating products utilising the name.

The designated authorities shall facilitate information exchange among relevant departments, agencies and bodies, such as police, anti-counterfeiting agencies, customs, intellectual property offices, food law authorities and retail inspectors, to ensure efficient enforcement.

5.2 GI Enforcement Challenges and Tools to Address Them

5.2.1 Non-compliances and Infringements

Official controls of PDO/PGI/TSG/GI in 2022³⁷



The enforcement system usually provides two separate levels of action.

The first step is realized by competent authorities and authorized delegated bodies by the **adoption of an act on “non compliances” procedures**. The measures are chosen depending on the severity of the detected irregularity (very serious, serious or mild). Non compliances imply – for the producer – the obligation to take corrective measures to overcome the detected irregularities and may even imply the impossibility to use the GI/TSG on all or part of its production.

The second level of action is implemented when the **corrective measures adopted by producers have been insufficient to eliminate the detected non compliances or when the non-compliance is considered an infringement under national legislation**. In these cases,

³⁷ COMMISSION STAFF WORKING DOCUMENT Accompanying the document REPORT FROM THE COMMISSION On the overall operation of official controls carried out in Member States (2022) to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, p. 51 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024SC0208>)

Depending on the Member State, information on infringements was reported by sector or product category by some EU countries (e.g. Italy or Czechia), while the majority of EU countries reported on the entire GI sector (covering wine, spirit drinks and agricultural products).

Member States can apply administrative or criminal sanctions to the producer depending on the circumstances to be provided for in a national regulation with the status of a law.

Common corrective actions taken by the producer or holder may be the following

- Withdrawal of the non-complied product from the market,
- Change of product labelling / name and other corrective actions (with the approval of the MS control authorities),
- Correction/removal of text in advertising material,
- Correction/removal of text from the website of a company that produces, advertises, promotes or sells the product.

Some Member States concluded numerous technical **cooperation agreements** between homologous foreign control authorities of third countries, including the mutual cooperation for protecting recognised Geographical Indications.

In case of a **GI originating from a third country**, the GI product shall comply with all the relevant EU rules (including the product specification) at the time of being released for free circulation on the EU market.

Example: Focus on Italy

The Italian competent authority (ICQRF) has concluded numerous technical cooperation agreements between homologous foreign control authorities (e.g. from Moldova, Georgia, Jordan, China, North Macedonia), strengthening the protection of Italian PDOs/PGIs on third country markets.

5.2.2 Internet and Domain Name System

GIs represent an attractive marketing tool at a time when consumers are placing greater importance on the guarantee of origin of the products they buy. This image of quality attached to GIs can nevertheless be coveted, which should lead the actors in the GI sector to be more vigilant on the Internet, because of the weaknesses inherent to this new trading space.

Online trade offers producers and consumers new opportunities and possibilities for buying and selling regionally, nationally and internationally. Nevertheless, the Internet has become one of the main channels for the sale of counterfeits.³⁸

In order to achieve a higher level of protection for GI products, the Regulation (EU) 2024/1143 introduced means to enhance the protection of GI products, especially online, through several key measures.

Obligations of Providers on the online market

As specified in Article 43 of the Regulation (EU) 2024/1143, any information related to the advertising, promotion and sale of products that is accessible to persons established in the Union and that contravenes the protection of geographical indications provided for in Articles 26 and 27 of the Regulation (EU) 2024/1143 shall be considered illegal content as defined in Article 3, point (h), of the Regulation (EU) 2022/2065 (Digital Services Act (DSA) Regulation).

This in practice means that if a website or platform offers misleading or unauthorized use of GI names (e.g., selling cheese labelled as PDO/PGI while it is not protected PDO/PGI), that content is **considered illegal** and subject to removal.

National judicial or administrative authorities can issue orders to act against such illegal content – order to online platform or marketplace to remove the illegal content – i.e. the ad infringing the GI.

Some Member States competent authorities have established a special mode of cooperation with big online platforms in order to fight against infringements of GIs more effectively.

Example: Focus on Italy and Spain

A Memorandum of understanding was signed with the most important global players in electronic commerce, which allow the competent authorities to quickly remove from the e-commerce platforms illegal products, as well as all sorts of irregular advertisements that unduly exploit the reputation of key Geographical Indications.

³⁸ Quotation from AREPO Practical Guide on “The protection of GIs on the Internet” | AGROSMARTglobal (https://www.arepoquality.eu/wp-content/uploads/2023/03/protection-of-gis-on-the-internet_arepo-practical-guide_en.pdf)

Protection of GIs in the Domain Names



Source: AREPO³⁹

Disabling access to the domain name that contravenes protection of GIs

In accordance with Article 42(4) of Regulation (EU) 2024/1143, Member States are required to take appropriate administrative and judicial measures to disable access to domain names that infringe protection of GI rights from their territory.

- This access disabling action would apply to domain names accessible in their territory and could be executed via internet service providers.
- It is an enforcement action that Member State competent authorities could take through appropriate administrative and judicial steps, in order to stop any unlawful use of GI names. It is meant to ensure an efficient protection of GIs on the market, including through online interfaces.

This means, that upon identification of domain names that infringe protected GI names, competent authorities in Member States should initiate administrative or judicial procedures to block access to these domain names **within their territory**. Blocking of access is normally implemented at the level of internet service providers (ISPs).

This measure aims to prevent the access to domain names (i.e. websites) that infringe GI protection and, in some cases, can also be linked to websites selling counterfeit GI products.

³⁹ https://www.arepoquality.eu/wp-content/uploads/2023/03/protection-of-gis-on-the-internet_arepo-practical-guide_en.pdf ; p 32

The blocking applies only to access from within the Member State, the website is however not being removed and remains accessible from other Member States.

Example

The registration of second level of a domain name that abusively include GIs like: “champagne.in” where “champagne” is a second-level domain (SLD) and <.in> is the country-code top-level domain (ccTLD) – in this case for India. In this case, Member States, according to their national law may block access from their territory to the website.

Provisions on Alternative dispute resolution procedures of ccTLDs in the EU

Article 35 of the Regulation (EU) 2024/1143 requires country-code top-level domain (ccTLD) registries established in the EU to ensure that their alternative dispute resolution procedures (ADR) recognize registered geographical indications as enforceable rights.

- Registered GIs are now formally recognized as enforceable rights in alternative dispute resolution (ADR) mechanisms **for country code top-level domains (ccTLDs)** within the EU (e.g., .be, .eu).
- This means that **the EU ccTLD registries**, who are the operators responsible for managing and operating country specific top-level domains, such as .be or .eu., **must ensure that their ADR procedures recognise registered GIs as a right** that can be invoked in those procedures.

Based on the above, under the ADR procedures of respective ccTLD established in the EU, the legitimate GI right holders can challenge domain name registration that infringes their GI right. Usually, the right holders can seek the cancellation or transfer of the domain name that improperly uses or exploits their protected name.

The ADR procedure provides the possibility to resolve the domain name conflict faster and more efficiently, without going to the court.

ADR procedure is to be initiated by the GI right holders or their producer organisations. Depending on the ccTLD where the GI infringing domain name is registered, GI right holders should check the ADR rules of the respective ccTLD registry and follow the prescribed procedures accordingly.

Example

- In March 2024, the Côtes de Provence Wine Syndicate took steps to recover domain name **<cotesdeprovence.fr>**, that was registered by the company specialising in IT services. The Syndicate believed that this constituted misappropriation of protected PDO wine **“Côtes de Provence”**. As the domain name was registered under a ccTLD for France (.fr), the Syndicate initiated the domain name dispute with Afnic (Association Française pour le Nommage Internet en Coopération), which is responsible for managing domain names ending in **“.fr”**. After carrying out the assessment, Afnic ruled in decision in September 2024 the transfer of the domain name <cotesdeprovence.fr> to the Syndicat des Vins Côtes de Provence.
- Red.es in Spain is a public business entity attached to the Ministry for Digital Transformation and Public Administration, also has national authority for managing domain name registrations under the country code ‘.es’. 600 “.es” domains have already been detected that contain names registered as GI and could infringe the protection established by the Regulation, a complaint will be filed with the Judicial Police, as a prior step to the disqualification of such domains. This entity is reviewing its regulations to adapt to the provisions of Regulation (EU) 2024/1143.

Domain Name Information and Alert System

Article 35 (2)-(3) of Regulation (EU) 2024/1143 proposes a system to provide GI applicants with:

- Information about the availability of their GI as a domain name.
- Alerts on registrations of domain names identical to their GIs (optional basis).

This system is not in place yet; the European Union Intellectual Property Office (EUIPO) will be responsible and would monitor.eu and ccTLDs of EU Member States once the system is implemented.

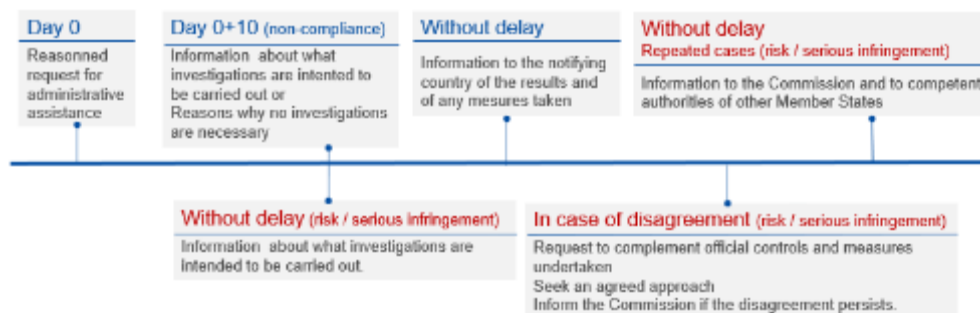
5.3 Administrative assistance and cooperation

For efficient market controls, exchange of information is key, as well as is assistance, where the scope of intervention goes beyond the borders of one Member State.

Mutual assistance and cooperation are part of the enforcement system and aim at ensuring that infringement cases are effectively followed up at EU level. As such, they are crucial for the protection of geographical indications and play an important role in cross-border trade. To that end, Member States have general obligations of sincere cooperation arising from Article 4 of the Treaty on European Union⁴⁰.

5.3.1 Administrative assistance and cooperation under the OCR

Competent authorities are required to make use of the **administrative assistance and cooperation mechanisms** whenever a case involves **cross-border implications or cannot be effectively addressed by a single Member State acting alone**. These mechanisms are established under the framework of the OCR.



Source: BTSF training materials

In the OCR, administrative assistance and cooperation is enforced and further clarified in Title IV (Articles 102-108). According to Article 104 (1), the competent authorities in a Member State may issue a reasoned request for assistance from the competent authorities of another Member State if it is needed for the performance of official controls or for the effective follow-up to such controls in their territory. In particular, the assistance may concern request for data or information from the competent authorities of another Member State.

Authorities shall use the **Alert and Cooperation framework** where:

- non-compliance affects or may affect more than one Member State;

⁴⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C:2016:202:TOC>

- information, investigations, or enforcement measures are required from authorities in another Member State;
- where a non-compliance poses or may pose a direct or indirect risk to human health, requiring rapid information exchange between Member States and the Commission;
- there are suspicions of fraud⁴¹, misleading practices, or misuse of protected names linked to operators established in another Member State.

Requests for administrative assistance and all notifications should be given appropriate follow-up. To that end, Member States should designate one or more liaison bodies to assist and coordinate communication flows between competent authorities in different Member States (recital 75 and Article 103 (1) of OCR).

Authorities shall:

- provide assistance without undue delay when requested by another competent authority;
- exchange relevant information necessary for official controls and enforcement actions;
- ensure accuracy, completeness, and timeliness of the information shared;
- follow up on requests and communicate the outcome of investigations or measures taken.

A **Rapid Alert notification (RASFF notification)** shall be issued where a non-compliance poses or may pose a direct or indirect risk to human health, requiring rapid information exchange between Member States and the Commission. Competent authorities are obliged to notify this incident without delay when:

- food or feed placed on the market presents a serious risk to human health;
- a product subject to recall, withdrawal, or other urgent measures has been distributed to other Member States;
- information on a risk requires coordinated or immediate action at Union level.

These mechanisms are not optional tools but constitute a mandatory cooperation framework where the legal and factual circumstances so require.

Notifications are created onto **iRASFF, an online platform** created by the Commission, through which all Member States can transmit their notifications or provide follow-up to previously transmitted notifications by other members. It functions like an online interactive platform and has a specific workflow to allow members of the network to collaborate on the notifications in a transparent way. It is designed to function both at national and EU level.

DG SANTE provides technological and organisational support to the Alert and Cooperation Network, maintains and updates Standard Operating Procedures and guides how notifications are created, shared, and acted upon. Once Member States submit notifications, the Commission reviews notifications and may request clarification or additional information from the notifying authority so that other network members can take appropriate actions.

⁴¹ “a non-compliance concerning any suspected intentional action by businesses or individuals, for the purpose of deceiving purchasers and gaining undue advantage

In case of notifications regarding GIs/TSGs in the Alert and Cooperation Network, DG SANTE informs DG AGRI to ensure that notifications are eventually followed up.

5.3.2 Cooperation under Regulations specific for GIs

In addition to the OCR, the GI regulation makes it explicit in its Article 44 (for agricultural products and spirit drinks) and Article 76 that Member States shall assist each other for the purpose of carrying out the controls and enforcement of GIs and TSGs in accordance with Title IV of the OCR.

In case of wines, Commission Implementing Regulation (EU) 2019/34 (recital 20) makes a general reference to cooperation between Member States and refers further to Commission Delegated Regulation (EU) 2018/273, which lays down specific provisions on mutual assistance of competent authorities, in particular in Article 43. Moreover, Article 17(4) 19(7) of Implementing Regulation (EU) 2019/34 on cooperation between competent authorities/delegated bodies of different Member States responsible for carrying out checks on PDO or PGI wines.

Example: focus on Germany and Spain

- In Germany, as regards the wine sector, there are obligations to provide mutual information and assistance in investigative activities based on internal rules governing cooperation between the Regions (Länder). Otherwise, the general law of prosecution applies.
- In Spain, with regard to the wine sector, there is an agreement whereby the competent authorities must inform the Ministry of Agriculture, Fisheries and Food of all bulk wines sent to other EU Member States or to a third country with access to the iRASFF system. The Ministry of Agriculture collaborates through this system to inform the country of destination about the shipment of these bulk wines by sending the documentation and requesting that the bottling be checked at the destination.

5.3.4 Examples of Informal networks

Informal cooperation networks may bring benefits to organizations by driving faster information sharing, enhancing employee trust and engagement. These networks usually operate outside formal hierarchies, allowing for flexible, cross-functional collaboration at a technical level.

European level

The “Heads of Food Safety Agencies”⁴² (HoA) is an **informal group** comprised of the heads of the food safety authorities of EU Member States and further European countries.

Member State level

In Italy, the Minister of Agriculture sets up a **Steering Committee**, as a tool for the coordination of control activities. The synergy between the various competent actors for control optimizes the expertise deployed, speeds up control procedures and improve their quality, avoiding unnecessary duplication of checks. The activities of the Committee focus mainly on the protection of Italian products, with checks at ports and borders, as well as post-import checks at post-import controls at the consignees of the goods.

6. Information on GIs/TSGs

Efficient GIs/TSGs controls and enforcement start from having relevant information on GIs/TSGs available and easily accessible.

6.1 The Union Registers

E-Ambrosia the Union register of geographical indications, the Register for TSGs, are placed under two different tabs on the Commission’s website. The registers are two-fold: first they provide information on all ongoing applications on GIs or TSG (i.e. to register, amend or cancel); second it display the registers of all GI or TSG, i.e. names that are registered (i.e. entered into the registers). The registers are available in all EU languages on the Commission’s website.

6.1.1 GIs


<https://ec.europa.eu/agriculture/eambrosia/geographical-indications-register/>

⁴² https://www.bvl.bund.de/EN/Remit/international/02_Boards/HoA/HoA_node.html

European Commission > Agriculture and rural development > Farming > Geographical indications and quality schemes > Geographical indications registers > Geographical indications register

eAmbrosia

Union register of geographical indications



eAmbrosia is a legal register of the names of agricultural products, wine, and spirit drinks that are registered and protected across the EU. It provides a direct access to information on all registered geographical indications, including the legal instruments of protection and product specifications. It also displays key dates and links for applications and publications before the geographical indications are registered.

You can also find information about the traditional areas for wine and the traditional specialties guaranteed in the section Related links below.

[Wine register](#)
[Agricultural products register](#)
[Spirit drinks register](#)

Geographical indications - Search

Product type: [dropdown] File number: [text, min. 3 characters] Name: [text, min. 3 characters]

Application type: [dropdown] Country zone: [dropdown] Country: [dropdown]

Type: [dropdown] Status: [dropdown] Recognized producer group name: [text]

Combined nomenclature code: [text, min. 3 characters (numeric code or text)]

[Search](#) [Reset](#)

Records

Product type, Country, File number, Name, Combined nomenclature code, Status, Date

Product type	Country	File number	Name	Combined nomenclature code	Status	Date
Food	Greece	PGI-GR-02783	Kyziou - Kifis	15	Published	10/04/2023
Food	Bulgaria	PGI-BG-00411	Yakovitski vodki (Yakovitski Rak)	2203	Published	14/04/2023
Wine	France	PGI-FR-0238	Alsace Villages Bières	2094	Published	14/04/2021
Food	Turkey	PGI-TR-00410	Çarşamba (Sakir) Nohut / Akşir (Sakir) Nohut	1028	Published	13/04/2023
Food	Hungary	PGI-HU-00116	Mályos csipet	0007 11	Applied	08/04/2021
Wine	Spain	PGI-ES-01182	Marques de Castilla de Borja (MDCB)	2094	Published	08/04/2023
Wine	Spain	PGI-ES-01181	Marques de Castilla de Borja (MDCB)	2204	Published	08/04/2021
Spirit drinks	Italy	PGI-IT-02803	Mulino Ciochero / Mulino Ciochero	2098	Published	08/04/2023
Food	Sweden	PGI-SE-00205	Multhåls smörg	1005	Published	07/04/2023
Food	Turkey	PGI-TR-00026	Mez Döğruşek	15	Published	07/04/2023

E-Ambrosia increases transparency and simplifies search by centralizing information on all types of GIs. It offers several search criteria allowing for advanced search features:

[Wine register](#)
[Agricultural products register](#)
[Spirit drinks register](#)

Geographical indications - search

Product type: [dropdown] File number: [text, min. 3 characters] Name: [text, min. 3 characters]

Application type: [dropdown] Country zone: [dropdown] Country: [dropdown]

Type: [dropdown] Status: [dropdown] Recognized producer group name: [text]

Combined nomenclature code: [text, min. 3 characters (numeric code or text)]

[Search](#) [Reset](#)

Producers, consumers, national authorities, companies as well as researchers can now easily access information on all GIs, including their status (applied, published or registered) and a direct link to the legal basis once officially protected:

- access to publications in the OJ: Single documents (latest version in all EU languages) and access to the specifications (national language);

- extract from the registers.

6.1.2 TSGs

<https://ec.europa.eu/agriculture/eambrosia/geographical-indications-register/tsg>

The TSG register possesses the same functionalities as the GI register as regards search and information content.

6.1.3 Traditional terms protected in the European Union

<https://ec.europa.eu/agriculture/eambrosia/geographical-indications-register/tdt>

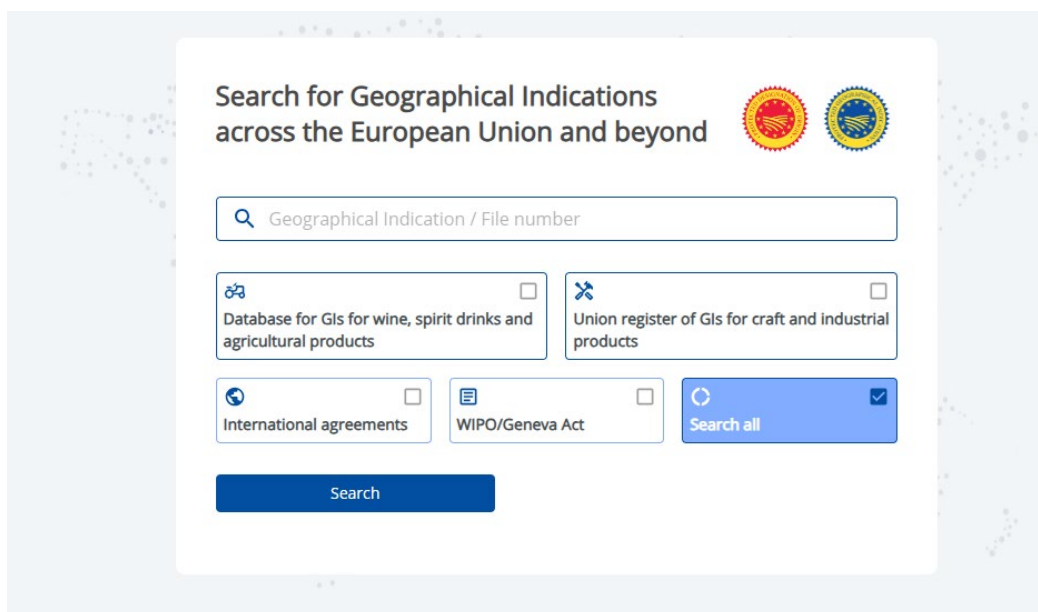
Traditional terms protected at EU level are **terms in the wine sector** traditionally used to convey **information to consumers** about *production or ageing methods, colour, type of place or a particular historical event of a wine with a protected designation of origin or geographical indication*. Some traditional terms are traditionally used to indicate that the wine has a protected designation of origin or geographical indication.

Traditional terms are relevant only for the labelling of GI wines.

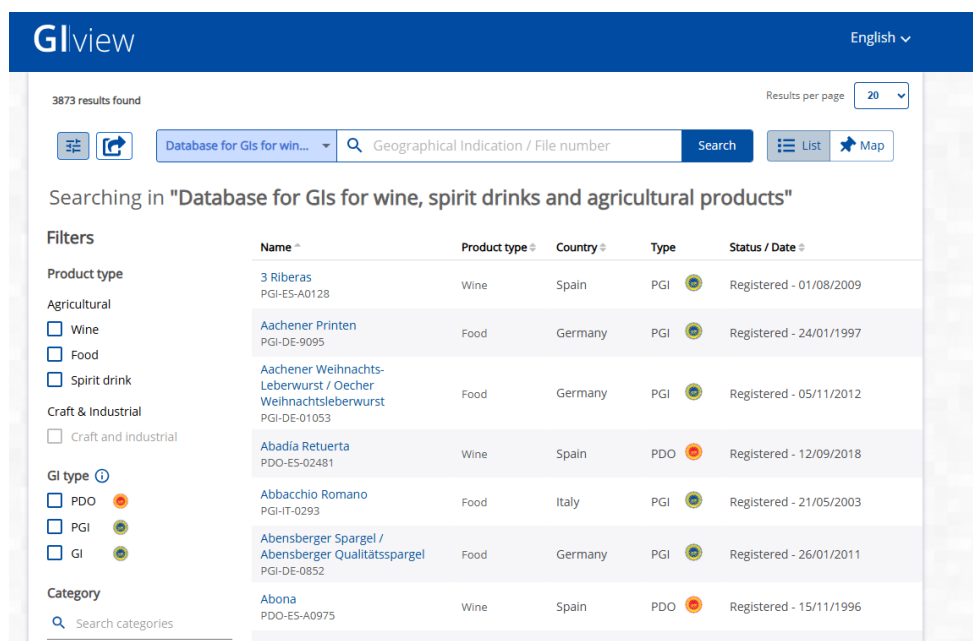
6.2 Gview: online consultation tool

<https://www.tmdn.org/giview/>

Gview is a result of collaborative efforts between the European Commission DG AGRI and the European Union Intellectual Property Office (EUIPO) to enhance the public availability of information and improve the enforcement of geographical indications rights.



Gview is a modern user interface portal on EU GIs. It is in the form of a public searchable database on the internet available in all EU languages, for all GIs registered within the EU or protected under international agreements.



GView responds to a clear need from enforcement authorities and stakeholders to have better and easier access to GI information. It offers the public in general, as well as specific interested parties (e.g. producers, trade mark holders, enforcement authorities, public administration officials), comprehensive information on all GIs.

It facilitates access to **information on GIs, in a common electronic format**, enhanced with additional information and improved search capabilities.

GView is also intended to facilitate a simplified **access to enforcement tools** by giving GI right-holders the option to request access to the EUIPO's Information Exchange module of the 'IP Enforcement Portal'⁴³ (IPEP) – managed by the [European Observatory on Infringements of Intellectual Property Rights](#) –, ensuring direct contact with anti-fraud police and customs.

GView is regularly updated with official data of all GIs via eAmbrosia, such as GI type, priority date, legal status, basis of protection in relation to all GIs registered at EU level or protected under international agreements.

Once country authorities have full access, they can upload (or delegate to producer groups to upload) **extended data** such as the contact data of the GI producer group and control bodies, maps, photographs of the product, product description, definition of the geographical area, sustainability statement, etc.

⁴³ The Portal is an interactive, reliable and user-friendly tool for EU IPR enforcement, serving as a secure communication tool between all related parties: rights holders (and/or their legal representatives), EU enforcement authorities, the EU Commission and its EU delegations around the world. The IP Enforcement portal is the integration of the Enforcement Database (EDB), the communication hub between rights holders and enforcers, the Anti-Counterfeiting Intelligence Support Tool (ACIST) and the Anti-Counterfeiting Rapid Intelligence System (ACRIS).

7. Annexes

1. Example: **Control Plan** for “Gorgonzola” PDO cheese; more examples: <https://www.masaf.gov.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/7467>
2. Example: **Control Plan** for “Szentesi paprika” PDO pepper; excerpt from the product specification
3. Example: **Control Plan** for “Emilia Romagna” wine; more examples: <https://www.masaf.gov.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/5965> or France <https://www.cavb.fr/tous-les-plans-de-controle-des-aoc-et-igp-de-bourgogne>
4. Example: **Control Plan** for “Grappa” spirit drink; more examples: <https://www.masaf.gov.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/10162>
5. **Annex to national decree** no 7552 from Italy on controls; reference to page 24
6. **Standard model** form set out in the Annex to Regulation (EU) 2019/723 ensuring the uniform presentation of Member States' annual reports on the implementation of the MANCP
7. **Information sources** by Spain
8. Overview table on **GI/TSG labelling** aspects
9. Example of a **control plan for a TSG** (internet link only): <https://www.masaf.gov.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/16904>
10. **Commission Notice C/2024/6481** on the Implementation of Regulation (EU) 2017/625 of the European Parliament and of the Council (Official Controls Regulation) (internet link only): https://food.ec.europa.eu/document/download/6205327f-5071-434b-8040-08123a48391c_en?filename=official-controls_comm-notice_ocr-implementation_2024.pdf

For more information



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