



To the Agricultural Permanent
Representatives to the
European Union

Brussels, 04 May 2023

RE: GI policy review – Joint position ahead of SCA meeting on 8 May

Dear Permanent Representatives,

Our associations which represent GI producers, cooperatives, and regions would hereby like to share with you our views on the ongoing reform of the Geographical Indications (GI) policy, in particular with respect to the latest proposal for a mandate for negotiations with the European Parliament put forward on 27 April by the Swedish Presidency and set to be discussed at the next meeting of the Special Committee on Agriculture on 8 May.

We welcome the progress achieved as regards the role of the European Union Intellectual Property Office (EUIPO). As has been communicated in previous months, the EUIPO could contribute by managing the Union register, as well as a domain name information and alert system, but the Commission should remain fully in charge of the applications for registration, amendments, oppositions, and cancellations of GIs. In the same vein, the improvements made to (recognised) producer groups and sustainability undertakings/practices are moving in the right direction.

While many of the modifications add clarity and simplify the EC proposal, we regret that some of the proposals would either reduce the level of ambition or add an unnecessary level of complexity. More specifically, whilst the protection of GIs on the online market is strengthened by the modifications introduced in Article 43, we regret that the European Commission's proposals on the **protection of domain names** (Article 34) have been watered down.

Additionally, we regret that the protection of **GIs as ingredients** has been lowered. We believe that a producer of a prepacked food, containing as an ingredient a GI product, who wishes to use the name of said geographical indication in the name of that prepacked food should obtain the consent of the recognised producer group if such a group exists rather than simply giving a prior notification.

Finally, we do not agree with the proposed changes to the EC text that would extend the **provisions on controls** contained in the future GI Regulation to wines. Considering the recently revised and improved CAP already provides for detailed controls of GI wines that work well, there is no added value in the Presidency's proposal. Furthermore, this would result in an unnecessary splitting of the rules on controls on appellation wines with provisions on the control of oenological practices and product specifications being transferred to the future GI Regulation while a new article on the control of traditional terms would be introduced in the CAP.

We thank you in advance for considering the aforementioned concerns and call upon you to raise them at the political meeting of the Special Committee on Agriculture on 8 May and during the

trilogue negotiations. In particular, we urge you to be inspired by the balanced compromise, the so-called **'wine package'**, reached by the Committee on Agriculture and Rural Development in the European Parliament. The compromise unanimously adopted on 20 April makes the most of the ongoing revision by bringing wine closer to spirits and agricultural foodstuffs while concurrently safeguarding wine specificities provided for in the CAP and especially in the Common Market Organisation (CMO) Regulation.

Yours faithfully,

On behalf of the following organisations:

AREPO – The Association of European Regions for Products of Origin

AREV – The Assembly of European Wine Regions (AREV)

CEVI – The European Confederation of Independent Winegrowers

Copa-Cogeca – The united voice of farmers and their cooperatives in the European Union

EFOW – The European Federation of Origin Wines