



AREPO POSITION ON THE EC INCEPTION IMPACT ASSESSMENT ON THE REVISION OF THE EU GIS SYSTEMS

The [Association of European Regions for Products of Origin \(AREPO\)](#) is a network of Regions and producer associations that deals with products of origin and EU quality schemes. It represents 33 European regions and over 700 associations of producers for over 50% of European GIs.

AREPO welcomes the European Commission intention to strengthen GIs legislative framework and thus increase their take up across the EU, while ensuring their effective protection within the EU.

AREPO is driven by a vision of **Geographical Indications (GIs) as tools for rural development and territorial planning**. Agriculture and the agri-food industry are essential pillars of our regional economies and they are rooted in our culture and identity. In particular, GIs play a major role in maintaining economic and social activity in rural areas and are therefore crucial in preserving the territorial balance at regional level.

For this reason, **AREPO acknowledge the EU quality policy** as a public policy aiming at delivering **public goods** to the whole European society. As such, it should be considered a **major pillar of the Farm to Fork (F2F)** strategy for a transition towards a European sustainable food system.

In fact, EU quality policy already contributes to several fundamental objectives of F2F strategy: addressing citizens demand for traditional products with the **highest possible standards of food safety and quality**; ensuring economic sustainability thanks to conditions of fair competition and **higher producers income**; ensuring **sustainable food production** through the protection of rural landscape and sustainable management and reproduction of natural resources; and providing **clear communication to consumers** concerning product characteristics and origin. Furthermore, geographical indications (GIs) traceability and protection mechanism represent an important and efficient tool to **combatting food fraud**.

Finally, GIs protection is often associated with the production of public goods, such as conservation of **biodiversity**, contribution to **animal welfare**, protection of **cultural heritage**, socio-cultural and rural **development** and reduction of poverty, in particular in mountainous and remote regions, where the farming sector accounts for a significant part of the economy and production costs are high.

Thus, AREPO welcomes the Commission recognition of GIs as a **“key vehicle for delivering rural growth”**, as well as the acknowledgment of GIs contribution to sustainable food production.

Nevertheless, AREPO shares the EC analysis as regards to the existing problems concerning EU quality policy and welcomes the specific objectives and policy options described in the inception impact assessment on the revision of the EU GIs system.

Indeed, AREPO firmly believes that this initiative is fundamental to strengthen EU quality policy and maximise **GIs potential in delivering public goods**, as well as their contribution to F2F strategy.

Finally, our regions have long been involved in the process of protection, promotion and valorisation of Geographical Indications. In light of the technical and multinational expertise present in the network, **AREPO asks the European Commission to be associated in the revision process of the EU quality policy**, especially in the framework of the forthcoming consultations, but also in the different governance bodies and forums that will be launched at EU level.

All this considered, in order to better address the challenges faced by EU quality policy as well as to strengthen GIs legal framework, **AREPO recommends the European Commission to:**

1. IMPROVE PROTECTION AND ENFORCEMENT OF GIS IN THE MEMBER STATES:

- Assure credibility of GI system and consumer trust **improving enforcement and harmonise controls in MS**;
- **Strengthen protection** to cover more effectively attempts by third parties **to abuse the GIs reputation**: registered names shall be protected against exploitation, but also against the weakening and dilution of their reputation;
- Strengthen protection to cover Internet **domain names** registrations: registered GI names shall be protected against any bad faith registration in second-level domain names, i.e. website names;
- **Request Member States to regulate the relations between trademarks and geographical indications** in order to **extend the protection** of the latter, defining within the **national registration procedure** the moment in which the registration of a trademark is refused on the grounds that the protected name or GI is being registered;
- **Promote awareness campaigns** to facilitate the understanding and harmonized implementation of the protection against GIs evocations, in accordance with the EU regulations and case law;
- Ensure a **better protection of EU GIs in third country**, and work on a better enforcement of international agreement signed by the European Union with third countries.
- Guarantee the **same level of protection** to GIs containing, in part or in whole, names of breeds or varieties (Art. 42, Reg. 1151/2012 seems to introduce distinctions).

2. CLARIFY THE LEGAL FRAMEWORK AND INCREASE EFFICIENCY OF GI REGISTRATION PROCEDURE:

- **Ensure further simplification and harmonisation of EU Quality Policy**, namely implementing the simplification of amendment procedure for products' specifications, while ensuring a level playing field between the different MS through the adoption of **common guidelines** for the competent national authorities;
- Overcome the lack of harmonisation among MS providing for **trainings addressed to the national authorities** involved in the process of GIs registration and **publishing EC guidelines** on the interpretation of GIs regulation concerning internal evaluation criteria for GIs registration and amendments;
- **Periodically collect and publish consolidated data on the GIs sector**. These data should touch up economic figures but also provide a good overview of the implementation of GI controls and certification systems in the Member States, solutions to improve them to ensure a high level of GI protection and a coherent implementation of the ex officio protection across Member States;
- Provide GI products with **specific CN codes** to facilitate the understanding of the trade flux for these products and, hence, allow for more efficient promotional campaigns to be implemented;
- **Clarify labelling rules for processed products using a GI as an ingredient**;
- Clearly **determine who owns the intellectual property of the GIs** referred to in Article 1.1.c Reg. 1151/2012.

3. IMPROVE GI CONTRIBUTION TO SUSTAINABLE PRODUCTION:

- Allow **economic, social and environmental sustainability aspects** to be included in GIs products' specification;
- **Include EU quality schemes in EC strategic approach to EU agricultural R&I**, defining specific priorities and increasing funding and dedicated project calls for strengthening their contribution to public goods creation;
- **Financially support the creation of new formative offers to train GIs experts and professionals** able to understand the whole complexity, characterisation, construction and territorial impact of GIs;
- **Financially support** producers groups in carrying out **ex-ante evaluations** of the impact of registering a new GIs, as well as **strategic diagnostics** concerning the application process and GI products characterisation;
- **Financially support ex-post evaluation of the impact of a registered GI** in order to **update product specifications** addressing eventual sustainability issues and taking into account consumers expectations, developments in scientific and technical knowledge, evolution in market and marketing standards, as well as climate change adaptation and risk management;
- **Introduce training for GIs producers and producer groups** in order to accompany them through a sustainability assessment.

4. EMPOWER PRODUCER GROUPS:

- **Strengthen the role of GI producer groups** in particular with regard to supply regulation that should be extended to all PDO/PGI products;
- Entrust GI producer groups especially with providing **specific trainings to young generation** of producers and elaborating **valorisation strategies** encompassing also related activities, such as tourism;
- **Introduce preliminary training and information session** for potential producers: when a new producer group is going to start the application process to register a new GI, all the potential producers should be trained before the formal submission of a specification;
- **Ensure that future CAP strategic plans provide the right support for GIs producer groups**, including:
 - Financial aid for **certification and promotion activities**;
 - **Operating costs** of producers groups;
 - Activities related to the **surveillance of the enforcement of the protection** of the registered names, especially for small and new PDO/PGI, concerning in particular **support for legal protection costs**;
 - **Coordinated and collective activities in order to strengthen the supply chain**.
- **Analyse the way GI producer groups are structured in different Member States** to better understand the nature and prerogatives of PDO, PGI and GIs groups and ensure the best possible implementation.



5. IMPROVE CONSUMER INFORMATION AND AWARENESS:

- **Improve consumer awareness of GI logos** also by maintaining a sizable budget covering promotion of EU quality schemes;
- **Improve EU quality policy transparency and information for consumer**, creating an online tool with easier access to readable information concerning product specifications and characteristics. The information contained in eAmbrosia should be mainstreamed to increase the knowledge and awareness of consumers.

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