

Assessment of GI applications under bilateral agreements

Ewa MISZCZAK, European Commission Franciska SCHÖNHERR, EUIPO Brussels, Alicante | 25 June 2020

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EU-CARIFORUM Regional project, funded by the European Union and implemented by the European Union Intellectual Property Office (EUIPO)

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- How to find information about non-EU GI protected in the EU
- Components of the summary specification (bilateral agreements)
 - Name
 - Proof of protection in the country of origin
 - Product category under EU regulations
 - Applicant
 - Description of the product
 - Geographical area
 - Link
 - Controls
 - Specific labelling rules



FINDING INFORMATION ABOUT NON-EU GI



Search on EUROPA | Contact | Cookies | Legal notice | Privacy statement | English (en)

eAmbrosia (non-EU PGI/PDO, direct applications)

European Commission	EUROPEAN CO eAmbrosia – the EU		cations register				-		
lome > Food, Farming, Fisheries >	Food safety and quality > Certification 3	> Quality labels > Geograp	hical indications register						
	✓ Search Q			Wine Register 🗖	Food Register 🗖	Spirit drinks 🗖	Aromatised Wi	ne Register 🗖	
	Product Type	Select here	•		1	Туре	Protected Geograp	ohical Indica 🔻	
	Product Category		•			Application Type	Select here	•	
	non-EU countrie 🗡	Select here	•		:	Status	Registered	•	
	Name					File number			
							Search	Reset	
									19 Records

Product Type	Country 🗢	Туре	File number 🗢	Name 🗢	Product Category	Status	Date 🔺	x
Food	Cambodia	Protected Geographical Indication (PGI)	PGI-KH-02156	ស្តរះឆ្នោតកំពង់ស្ពី / Kampong Speu Palm Sugar / Sucre de Palme de Kampong Speu	Class 1.8. Other products of Annex I of the Treaty (spices etc.)	Registered	03/04/2019	i
Food	Norway	Protected Geographical Indication (PGI)	PGI-NO-1360	Fenalår fra Norge	Class 1.2. Meat products (cooked, salted, smoked, etc.)	Registered	26/09/2017	i
Food	Indonesia	Protected Geographical Indication (PGI)	PGI-ID-2115	Kopi Arabika Gayo	Class 1.8. Other products of Annex I of the Treaty (spices etc.)	Registered	23/05/2017	i
Food	Thailand	Protected Geographical Indication (PGI)	PGI-TH-1115	ข้าวสังข์หยดเมืองพัทลุง / Khao Sangyod Muang Phatthalung	Class 1.6. Fruit, vegetables and cereals fresh or processed	Registered	12/10/2016	i
Food	Cambodia	Protected Geographical Indication (PGI)	PGI-KH-1263	ម្រេចកំពត / Mrech Kampot / Poivre de Kampot	Class 1.8. Other products of Annex I of the Treaty (spices etc.)	Registered	18/02/2016	i

https://ec.europa.eu/info/food-farming-fisheries/food-safety-and-quality/certification/quality-labels/geographicalindications-register/#



eAmbrosia (non-EU PGI/PDO, direct applications)

DPEAN COMMISSIC	Fenalår fr	a Norge				×	
osia – the EU geographica	Pro	duct Type		Food			
quality > Certification > Quality labels > G	File	e number		PGI-NO-1360			
	Туг)e		Protected Geographical Indication (PGI)			
arch Q	Co	untry		Norway			Aromatised Wine Regist
duct Type Select here	Sta	itus		Registered			Protected Geographical Indica.
duct Category Select here	Pro	duct Category		Class 1.2. Meat products (cooked, salted, smoke	d, etc.)		Select here
duct category Select here	Leg	jal instrument		Official Journal L 246, 26.09.2017			Select here
n-EU countrie 🗹 Select here	Ар	plication Date		27/08/2015			Registered
ne	Dat	te of Publication		03/06/2017			
		te of Registration blication		26/09/2017 Official Journal C 177, 03.06.2017 Official Journal L 246, 26.09.2017			Search Rese
Type Protected Geographical Indic	Extract fi	rom the register					s of Annex I of the Treaty (spices
Protected Geographical Indic					Clos	se	(cooked, salted, smoked, etc.)
Protected Geographical Indica	ation (PGI)	PGI-ID-2115	Корі	Arabika Gayo	Class 1.8. Othe etc.)	r products	s of Annex I of the Treaty (spices
Protected Geographical Indica	ation (PGI)	PGI-TH-1115	ข้าวสัง	วช์หยดเมืองพัทลุง / Khao Sangyod Muang Phatthalung	Class 1.6. Fruit,	, vegetabl	es and cereals fresh or processed
Protected Geographical Indica	ation (PGI)	PGI-KH-1263	ម្រេច	កំពន / Mrech Kampot / Poivre de Kampot	Class 1.8. Othe etc.)	r products	s of Annex I of the Treaty (spices



'Single Document' (summary of product specification)

C 177/14

EN

Official Journal of the European Union

3.6.2017

Publication of an application pursuant to Article 50(2)(a) of Regulation (EU) No 1151/2012 of the European Parliament and of the Council on quality schemes for agricultural products and foodstuffs

(2017/C 177/06)

This publication confers the right to oppose the application pursuant to Article 51 of Regulation (EU) No 1151/2012 of the European Parliament and of the Council (¹).

SINGLE DOCUMENT

'FENALÅR FRA NORGE'

EU No: NO-PGI-0005-01260 — 27.8.2015

PGI (X) PDO ()

1. Name

'Fenalår fra Norge'.

2. Member State or Third Country

Norway





How products are protected

As part of the EU's system of <u>IPRs</u>, names of products registered as GIs are legally protected against imitation and misuse within the EU and in non-EU countries where a specific protection agreement has been signed.

For all quality schemes, each EU country's competent national authorities take the necessary measures to protect the registered names within their territory. They should also prevent and stop the unlawful production or marketing of products using such a name.

Non-European product names can also register as GIs if their country of origin has a bilateral or regional agreement with the EU that includes the mutual protection of such names.

The names of various products (wine, food, aromatised wines and spirit drinks), produced in several countries outside the EU, such as Colombia or South Africa, have been protected.



Download 🕁

https://ec.europa.eu/info/food-farming-fisheries/food-safety-and-quality/certification/qualitylabels/quality-schemes-explained_en



Total: 1554		GIs from non-EU countries protected in under bilateral agreements	Date: 22/04/2020	Version 1.0						
	This list is for information purposes only. Only the legal texts of the respective agreements published in the Official Journal of the EU have legal value. Some agreements use terms such as "name of origin" or 'product designations' rather than "geographical indication". For all legal provisions, refer to the texts of the relevant agreements. Meaning of asterisk (*): *Kosovo under United Nations Security Council Resolution 1244.									
Name of 3rd Transcription (if exists) country GI Transcription (if exists)				Country	Sector	Class				
Berat		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				
Bulqizë		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				
Delvinë		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				
Devoll		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				
Dibër		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				
Durrës		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				
Elbasan		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				
Fier		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				
Gjirokastër		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				
Gramsh		AGREEMENT between the European Community and Albania	01/12/2006	Albania	Wine	NA				



Article 6

Protection of geographical indications

- 1. In Albania, the geographical indications for the Community which are listed in Appendix 1, Part A:
- (a) are protected for wines, spirit drinks and aromatised wines originating in the Community; and
- (b) may not be used by the Community otherwise than under the conditions provided for by the laws and regulations of the Community.
- 2. In the Community, the geographical indications for Albania which are listed in Appendix 1, Part B:
- (a) are protected for wines, spirit drinks and aromatised wines originating in Albania; and
- (b) may not be used by Albania otherwise than under the conditions provided for by the laws and regulations of Albania.

eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=CELEX:22009A0428(02)&rid=1



PART B: IN ALBANIA

WINES ORIGINATING IN ALBANIA

Name of the specified region, as defined in the CoMD No 505, dated 21 September 2000, approved by the Albanian Government.

I. First zone, including the lowland and coastal areas of the country

	Specified regions hereunder followed or not by the name of a wine-growing commune and/or the name of a vineyard estate.
1.	Delvinë
2.	Sarandë
3.	Vlorë
4.	Fier
5.	Lushnjë
6.	Peqin
7.	Kavajë





OUTLOOK: Glview



- Cooperation between the European Commission (DG AGRI) and the EUIPO
- Still in development status
- Scope: all GI from eAmbrosia and non-EU GI included in agreements
- Launch foreseen for August 2020
- Second release expected for November 2020, with a private area for producer groups and country authorities



OUTLOOK: Glview – non EU GI – EU register/Agreements

Gliview				English 🗸
1654 results found			R	esults per page 20 🗸
ZA, VN, US, UA	Geographical indication / File nu	mber	Q	🔚 List 🖈 Map
Filters	Product Name 🌣	Product type 🗘	Country 🗘	Priority date / Status *
Product Type	Bourbon whisky/Bourbon whiskey/Bourbon	Spirit 1.7 Fresh fish	United States	24/05/1994 Protected under agreement
Food Spirit drink Aromatised wines	Tennessee whisky/Tennessee whiskey	Spirit 1.7 Fresh fish	United States	24/05/1994 Protected under agreement
Filter by categories	Bacanora	Spirit Agave spirit drink	Mexico	01/07/1997 Protected under agreement
Priority date () from	Sotol	Spirit Dasylirion spirit drink	Mexico	01/07/1997 Protected under agreement
to	Mezcal	Spirit Agave spirit drink	Mexico	01/07/1997 Protected under agreement
Gl type 🛈	Charanda	Spirit Sugarcane spirit drink	Mexico	01/07/1997 Protected under agreement
□ PGI ● □ GI ●	Tequila	Spirit Agave spirit drink	Mexico	01/07/1997 Protected under agreement
Status ()	Raicilla	Spirit Agave spirit drink	Mexico	01/07/1997 Protected under agreement
Published Registered	Baselbieter Burgermeister (Kräuterbrand)	Spirit Liqueurs	Switzerland	30/04/2002 Protected under agreement
Protected under agreement Basis of protection ①	Baselbieter Zwetschgenwasser	Spirit Fruit spirit	Switzerland	30/04/2002 Protected under agreement
EU register	Bern/Berne	Wine 1.7 Fresh fish	Switzerland	30/04/2002 Protected under agreement

OUTLOOK: Glview – non EU GI – bilateral agreements

				English 🗸
ZA, VN, US, UA, 👻	Geographical indication / F	ile number Q	Back to search results	<>
e Kirsch				
Туре				
File number	Product type Spirit	Basis of protection Agreements		
Product category ment Fruit spirit				
the European Union and th	e Swiss Confederation, OJ L	297, 16.11.2011		
	e Kirsch Type Protected Geographi File number Product category ment Fruit spirit	e Kirsch Type Protected Geographical Indication (PGI) File number Product type Spirit Product category ment Fruit spirit	e Kirsch Type Protected Geographical Indication (PGI) File number Product type Basis of protection Spirit Agreements Product category ment Fruit spirit	e Kirsch Type Protected Geographical Indication (PGI) File number Product type Basis of protection Spirit Agreements Product category ment Fruit spirit





COMPONENTS OF THE SUMMARY SPECIFICATION



COMPONENTS OF THE SUMMARY SPECIFICATION

- 1. Name
- 2. Proof of protection in the country of origin
- 3. Product category under EU regulations
- 4. Applicant
- 5. Description of the product
- 6. Geographical area
- 7. Link
- 8. Controls
- 9. Specific labelling rules





- Name to be registered: a word or word combination that designates the product
- Cannot be figurative, include a design, special fonts etc.
- Exact same name to be used throughout summary specification (")
- Multiple names possible, if all protected in country of origin and all meet requirements
- Presentation of the name: original script, upper and lower case, accents
- Transcription into Roman characters if necessary
- Language: language (historically) used in country or region of production
- Translations will not be part of the GI



NAME - EXAMPLES NON-EU GI (bilateral agreements)

- 'Perth Hills' (Australia)
- 'Abricotine / Eau-de-vie d'abricot du Valais' (Switzerland)
- '市田柿 / Ichida Gaki' (Japan)
- 'Honeybush/Heuningbos/Honeybush tea/Heuningbos tee' (South Africa)
- List of GI protected via bilateral agreements (names), <u>https://ec.europa.eu/info/sites/info/files/food-farming-</u> <u>fisheries/food_safety_and_quality/documents/list-gis-non-eu-countries-</u> <u>protected-in-eu_en.pdf</u> (status date 22/04/2020)



- Non-EU GI: need to be protected in the country of origin
- Provide legal basis for protection in your country
 - Date of protection, and
 - Legal instrument and official citation
- Example: GI system, trade mark system, governmental order
- Helpful for examination: link to public database if available
- Show protection of word for which protection is applied for (not design or figurative element)



3. PRODUCT CATEGORY UNDER EU REGULATIONS

- The product should fall under one of the product categories listed in
 - Annex XI of R. (EU) N° 668/2014
 - Annex I of the <u>Treaty on the Functioning of the</u> <u>European Union</u>
 - Annex VII, part II of R. (EU) N° 1308/2013
 - Annex II of R. (EC) N° 110/2008 (spirit drinks)*
- HS code for export of the product can be helpful
- EU not competent for non-agricultural GI (e.g. handicraft goods, stones)

ANNEX XI

CLASSIFICATION OF PRODUCTS

- 1. Agricultural products intended for the human consumption listed in Annex I to the Treaty
- Class 1.1. Fresh meat (and offal)
- Class 1.2. Meat products (cooked, salted, smoked, etc.)
- Class 1.3. Cheeses
- Class 1.4. Other products of animal origin (eggs, honey, various dairy products except butter, etc.)
- Class 1.5. Oils and fats (butter, margarine, oil, etc.)
- Class 1.6. Fruit, vegetables and cereals fresh or processed
- Class 1.7. Fresh fish, molluscs, and crustaceans and products derived therefrom
- Class 1.8. other products listed in Annex I to the Treaty (spices etc.)
- 2. Agricultural products and foodstuffs referred to in Annex I to Regulation (EU) No 1151/2012
- I. Designations of Origin and Geographical indications
- Class 2.1. beer,
- Class 2.2. chocolate and derived products,

Annex XI of R. (EU) N° 668/2014, <u>https://eurlex.europa.eu/legal-</u> <u>content/GA/TXT/?uri=CELEX%3A32014R0668</u>



EXAMPLE: Coffee

Corresponds to Class 1.8. Other products listed in Annex I to the Treaty (spices, etc.)

Chapter 6 | Live trees and other plants; bulbs, roots and the like; cut flowers and ornamental foliage | Chapter 7 | Edible vegetables and certain roots and tubers | Chapter 8 | Edible fruit and nuts; peel of melons or citrus fruit | Chapter 9 | Coffee, tea and spices, excluding maté (heading No 09.03) | Chapter 10 | Cereals | Chapter 11 | Products of the milling industry; malt and starches; gluten; inulin | Chapter 12 | Oil seeds and oleaginous fruit; miscellaneous grains, seeds and fruit; industrial and medical plants; straw and fodder | Chapter 13 ex 13.03 | Pectin | Consolidated version of the Treaty on the Functioning of the European Union, Annex I https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=celex%3A12012E%2FTXT





- GI: grant collective rights
- May be used by operators whose production/product complies with the product specification
- Usually: group of producers (e.g. farmers, processors)
- Provide name, address, contact data of the applicant*
- *if personal data (e.g. email address) contained: give express permission to store and publicise personal data
- If not a producer group, but single company or individual, explain that applicant has been accepted under the relevant national rules in force



- Describe the finished product to which the name applies (as available on the market/exported to the EU)
- Description: concise and technical
- Type, shape, weight, size, colour, taste, physical and/or chemical properties
- Level of detail: Brix level (sweetness/sugar content), acidity % if relevant
- Highlight the specificity of the product: how is it different from other products of the same category?
- Processed products: give information on the proportion of the raw materials
- Wine: raw materials, alcohol content, physical appearance, wine grape variety, type (white/red/rosé), still or sparkling
- Focus on the *final* product
- Description should allow control authorities to identify counterfeits



'XXX is a sweet orange. It has an intensive orange colour and aroma. It is oblate in shape. It has thin peel, soft and juicy pulp and no seeds inside. Its fragrance is strong. The diagram of a single orange is 40-50mm. The top of the orange is flat and a little cupped, and the bottom is also a little cupped, with 4 to 6 furrows stretching out. The surface of the orange is smooth and bright, with small, dense and smooth oil vacuoles. The peel is soft and resilient, about 0.15 cm thick and is easy to peel off. There are 9-12 crescent segments inside the orange; the axis of the orange is small and half-empty; the juice sacs are orange and fusiform, and contains much juice.'



6. GEOGRAPHICAL AREA

- Area from which the product originates
- Usually a delimited region within a country
- Whole country: provide justification
- Delimitation of the geographical area: clear and not too vague
- Example: 'XXX is located in the east of X Province, south of X City, in the upper range of the X River, between [...]'-[...]'east longitude and [...]'-[...]'northern latitude.

(administrative and geographical identification)





Link = The **essential** part of the Single Document

Link = **Logical reasoning**:

- Show how the qualities / specificities of the product are **due to** the characteristics of the geographical area
- **Objective arguments** linking the geographical area and the product



GIs are indications which identify a good as originating in the territory (region or locality)

- where given quality, reputation or other characteristic of the good
- is essentially attributable to its geographical origin







- Identify and describe the characteristics of the defined geographical area
 what makes this area "special"
- 2. Identify and describe the **characteristics** of the **product**
 - what makes this product "special" compared to similar products
- 3. Show how the **features of the product** are **produced by** the **factors** present **in the area**







7. LINK: GEOGRAPHICAL AREA



- Specificity of the designated geographical area
- Only characteristics that have influence on the product
- Clear and precise
- May refer to:
 - soil condition, climate characteristics such as temperature, sunshine exposure, high humidity, heavy rainfalls etc.
 - specific know how of local producers

7. LINK: GEOGRAPHICAL AREA







"The texture of fruit XXX is influenced by climate condition of XXX Island, particularly sunlight intensity and the exposure duration."





"Cultivation area is located at the hillside with the elevation around 900m, 750 mm – 2,000 mm/year rainfall and temperature around 16°C – 34°C, with duration of sunlight 9 – 12 hours. Soil type where the XXX fruit grows is brown latosol soil, that carries high organic aerasi substance, and good drainage".





"Factor of local society that is <u>skillfull in cultivation and climate prediction</u> have foster the cultivation.



Human factor also plays important role in production and post-harvest.





Producers have made their utmost effort in securing rice straw since they <u>aim to</u> <u>feed clean and excellent quality</u> rice straw to their cattle. Furthermore, producers adopt <u>small-scale farming style</u>, usually having 25 cattle per household on average. This enables producers to manage their cattle more closely, taking account of each calf's condition.



7. LINK: SPECIFIC PRODUCT







- Specificities of the product what makes product "special" in comparison with other products in the same category
- Only features of the product that have a relation to the geographical area
- Clear and precise
- May refer to specific shape, size, taste, aroma, etc.



Alcoholic beverage is produced by <u>distillation using wash produced with</u> <u>naturally filtered limestone water</u> obtained from the limestone water basins.




Alcoholic beverage is renowned for its <u>flavorful character and smoothness</u>, and the distinctive <u>sugar-cane sweetness on the aroma</u>.





- Show description of the reputation of the product marketed **under the name**
- Show that reputation is attributable to the geographical area
- Reputation of today (recent times) historical references not are relevant but help understanding the story of the GI
- **Proof**: celebrations of the product, prizes, books dedicated to the product, references in the cooking literature media, etc.



Due to the continuous efforts made by producers to improve production method, XXX BEEF obtained nationwide recognition.

During 1965 to 1974, the farmers had started fattening XXX cattle, and has continued to work on improving their production technique and method. As a result, XXX BEEF has received numerous awards including the <u>Honorary</u> <u>Awards at the National Beef Carcass Exhibition for 6 times</u>





XXX Pepper is a product which has high quality and reputation in the world market because it is cultivated by people who are concerning for quality. XXX Pepper has hold a long history for the living of the local community, <u>the first culture which began around the 19th century.</u>





- Short description of the causal link between geographical area and a specific quality, reputation or other characteristics of the product
- in what way the product's characteristics are due to the geographical area

 how the feature of the area such as soil, climate characteristics, local skills etc give its specificity to the product as compared to products of the same category produced in other geographical areas



XXX County is located in the mid-subtropical monsoon climate zone where the four seasons are distinct. The average annual temperature is 18.3° C; the effective accumulative temperature above 10° C is 5805.9° C; the average temperature of the coldest month is 6.1° C; the average lowest temperature is -4.7° C; the frost-free season lasts 271 days; the annual precipitation is 1700mm; the annual sunshine duration is 1928.2 hours. In the county winter is short and warm; spring comes early and autumn comes late; the growth period of crops is long; rainfall and heat resources are abundant. These climate characteristics are conducive to the growth of orange and ensure the excellent quality of XXX orange.





Thanks to particular climate conditions in XXX county, XXX orange has specific qualities. <u>High</u> level of <u>solar radiation</u> typical for XXX county makes the orange has an <u>intensive</u> <u>orange colour and high level of sugar</u> (taste test to optimally mature oranges shows sugar content of 10.44 - 10.78° Brix and organoleptic test results with a score of 4.0 (very sweet). This gives also to orange its particularly <u>strong flagrance</u>. Sufficient water supply thanks to <u>abundant annual precipitations</u> during growing season gives to orange it juicy texture as compared to oranges from neighbouring regions with lower annual precipitations. The abundance of sun and water stimulates oranges growth; Thus XXX oranges are bigger (<u>40-50mm diagram</u>) than oranges from neighbouring (max 30 mm diagram)



7.LINK: WHAT MAKES A GI?









- Give information on the control body/authority responsible for checking the respect of the product specification
- Controls not to be performed by the applicant/producer. Controls must be done by a governmental body or by a certified control body
- Public authority: government departments, agencies, regional authorities; please state that they do direct controls
- Certification body: controls by private control bodies acceptable, under certain conditions



- Are accredited according to/meet the requirements of the standard ISO/IEC 17065, and
- Are accredited by a national accreditation body outside the Union, in accordance with Regulation (EC) No 765/2008, or by an accreditation body outside the Union that is a signatory of a multilateral recognition arrangement under the auspices of the International Accreditation Forum (IAF), and
- The accreditation certificate must specifically include:
 - the name of the certification body
 - the name of the standard ISO/IEC 17065,
 - the products and sectors concerned, clearly stating the PDO/PGI quality scheme;
 - the name of the third country.

9. SPECIFIC LABELLING RULES



- Avoid references to national legislation/labelling rules
- Does not concern mandatory rules under national legislation, but rules specifically imposed for the product, as sold on the EU market
- Example: specific TM logo obligatory on the label, specific mentions

9. EXAMPLES

Reproduce specific logo

'[...] The packaging of the ground roasted coffee must also bear a printed, prenumbered guarantee stamp. The Spanish version of the Café de Valdesia logo is shown below:'

(direct application, PDO-DO-1197)

- Specific classification depending on ageing
 'Classifications C) to (E) shall be labelled as follows
 - c) Cask Aged XXX: aged for 3 years or
 - d) Special Reserve XXX- aged for 12 years or more
 - e) Grand Special Reserve XXX aged for 25 years or more '







- Avoid references to laws and regulations of your country
- Avoid non-relevant material (be concise and focus on the essential)
- Avoid references to external documents and websites the summary specification should be self-explaining
- Be cautious with rules on post-production, e.g. restrictions on bottling or packaging; can go against EU internal market rules





- European Commission, Quality schemes explained, <u>https://ec.europa.eu/info/food-farming-fisheries/food-safety-and-quality/certification/quality-labels/quality-schemes-explained</u> (contains overview of relevant EU regulations)
- eAmbrosia the EU geographical indications register, <u>https://ec.europa.eu/info/food-farming-fisheries/food-safety-and-</u> <u>quality/certification/quality-labels/geographical-indications-register/#</u>
- EU law available at EUR-Lex:

https://eur-lex.europa.eu/homepage.html?locale=en

 WIPO, Lisbon – The International System of Geographical Indications, <u>https://www.wipo.int/lisbon/en/</u>



THANK YOU GRACIAS MERCÍ BEDANKEN

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