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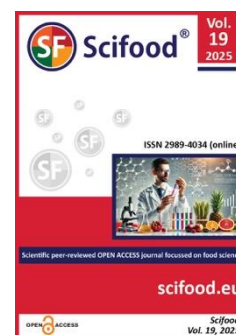
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Legal regulation of labeling extra virgin and virgin olive oil

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ABSTRACT

Labeling extra-virgin and virgin olive oils has received minimal attention in domestic and foreign legal doctrine. The European Union is the world's leading producer, exporter, and consumer of olive oil. In this paper, the authors summarize the legal regulation of labeling for extra-virgin and virgin table olive oils, drawing primarily on European Union standard-setting, the case law of the Court of Justice of the European Union, and relevant legal and food literature. In particular, the authors use the methods of synthesis and analysis to analyze the legal regulation of selected mandatory and voluntary information on extra-virgin and virgin olive oils, focusing on the name of the food, information on the categories of olive oils, the specific storage conditions of extra-virgin and virgin olive table oils and their place of origin. The paper aims to provide the reader with a comprehensive overview of the legal provisions governing the labeling of extra-virgin and virgin table olive oils, and to offer solutions to the problematic and contentious issues surrounding their labeling.

Keywords: Food Law, Virgin Olive Oil, Food Labelling, Place of Origin of Food, Common Agricultural Policy

INTRODUCTION

Olive oil is a yellow-to-yellow-green oil produced from olives [1]. It is generally understood to be oil extracted from the fruit of the olive tree mechanically and without chemical solvents [2]. The European olive tree (*Olea europaea* L.) belongs to about 20 to 25 genera (genus *Olea*) in the family Oleaceae and is one of the oldest cultivated plants. It is an evergreen, slow-growing, drought-tolerant, and highly long-lived species, with a life expectancy of around 500 years. The fruit of the olive tree is a drupe, which usually changes color from green to purple or almost black when fully ripe in late autumn [3]. Olive oil is considered a good source of fat in most Mediterranean countries and is gaining increasing popularity worldwide [4]. Olive oil has gained popularity among consumers, primarily due to its organoleptic properties (characteristics that the human senses can assess) and the associated health benefits [5]. It can be assumed that this is no different in Slovakia and the Czech Republic.

The European Union accounts for approximately 70 to 75% of global olive oil production. The European Union is thus a major producer, exporter, and consumer of olive oil [6]. The island of Crete is a prime example of a renowned olive-growing region, which utilizes 65% of the total agricultural land and produces approximately 35% of Greece's total olive oil [7]. Spain, Italy, Greece, and Portugal are among the most crucial olive oil producers in the European Union. In contrast, neither Slovakia nor the Czech Republic is a producer of olive oil for human consumption [8]. However, it is not the case that there is, therefore, no need to address the issue of correct (i.e. lawful) labeling of olive oils intended for sale to the final consumer. The results of the control action by the Czech Agriculture and Food Inspection Authority focused on the quality of olive oils in the Czech market network, showing that 44.4% of the evaluated samples did not meet the legal requirements. The most serious infringements were those olive oils that did not correspond to the 'extra-virgin' label when assessed, which were actually oils of a lower category [9]. Although the official food control authorities in the Slovak Republic have issued only two decisions in recent years regarding infringements in the placing on the market of olive oils [10], the situation in the Slovak market may be no different.

But first, let us take a closer look at the agricultural sector, which includes olive oil. Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organization of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (hereinafter referred to as the '*CMO Regulation*') establishes the European Union's common agricultural policy in the olive oil and table olives sector (Article 1(2)(g) of the CMO Regulation). However, the common organization of the market in olive oils was established in the European Economic Community on 1 November 1966 by Regulation No 136/66/EEC of the Council of 22 September 1966 on the establishment of a common organization of the market in oils and fats. In that Regulation, the standard-setter also defined for the first time the different types of olive oil which are now included in the olive oils and table olives sector of the European Union's common agricultural policy. This Council Regulation was later repealed by Council Regulation (EC) No 865/2004 of 29 April 2004 on the common organization of the market in olive oil and table olives and amending Regulation (EEC) No 827/68, which was subsequently incorporated into Council Regulation (EC) No 1234/2007 of 22 October 2007 establishing a common organization of agricultural markets and on specific provisions for certain agricultural products (Single CMO Regulation).

The olive oil and table olives sector encompasses olive oil and its fractions, as well as refined but unmodified olive oils (CN 1509 of the Common Customs Tariff) [11]. The marketing year for olive oil in the olive oil and table olive sector of the common agricultural policy of the European Union shall be from 1 October to 30 September of the following year (Article 6(f) of the CMO Regulation). It is worth noting that the marketing year for table olives in the olive oil and table olive sector is set differently, from September 1 to August 31 of the following year. The determination of the olive oil marketing year is also relevant in relation to the labeling of olive oils with voluntary information, in particular the optional indication of the year of harvest on extra-virgin and virgin olive oils (Article 11 of the Delegated Regulation for olive oil). Olive oils and table olives belonging to the olive oil sector are divided into three categories under the CMO Regulation. These are virgin olive oils, refined olive oils, and olive oils composed of a blend of refined and virgin olive oils (Part VIII of Annex VII of the CMO Regulation). The CMO Regulation also distinguishes three categories of olive pomace oil - crude olive pomace oil, refined olive pomace oil, and olive pomace oil. Olive pomace is a thick sludge, the main residue of the olive oil extraction (pressing) process. It is the residue of the pulpy material after most of the oil has been removed from the olive pulp and consists of pieces of skin, pulp, stone, and olive kernel [12]. Olive pomace is a source of fatty acids that play a role in various industries. The sale of crude olive pomace oil to the final consumer is not authorized. Still, if such olive pomace oil is refined, it may be placed on the market for sale to the final consumer and is suitable, for example, as frying oil or for other purposes [13].

In passing, it may be noted that olive pomace oils cannot be labeled with the compulsory food designation 'olive oil' because they do not meet the definition of olive oil, but are instead classified as olive pomace oils [14]. This requirement is also explicitly stated in the Codex Alimentarius Standard for Olive Oil and Olive Pomace Oil CXS 33-198. It can also be derived from Article 12(5) of Commission Delegated Regulation (EU) 2022/2104 of 29 July 2022 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards marketing standards for olive oil, and repealing Commission Regulation (EEC) No 2568/91 and Commission Implementing Regulation (EU) No 29/2012 (hereinafter referred to as the '*Delegated Regulation for olive oil*'), which states that where olive pomace oil is present in a product, the words '*olive oil*' are replaced by the words '*olive pomace oil*'. The Delegated Regulation for olive oil was last amended by Commission Delegated Regulation (EU) 2024/1401 of 7 March 2024 amending Delegated Regulation (EU) 2022/2104 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards marketing standards for olive oil. In food practice, it is also possible to encounter labeling of olive pomace oil with the compulsory indication under Article 9(1) of the FIC Regulation, which is the name of the food 'pomace olive oil'. The term 'pomace' refers to the English name for olive pomace oil. The official food control authority in the Czech Republic considers such labeling of olive pomace oil to be contrary to 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 (hereinafter referred to as the '*FIC Regulation*'), namely the fair information procedure referred to in Article 7(1)(a) of that Regulation [14]. The above can be accepted, as such a label would mislead the consumer regarding the characteristics and method of production of this oil.

As mentioned above, one category of olive oils is virgin olive oils. The standard-setter in the CMO Regulation defines virgin olive oils as oils obtained from the fruit of the olive tree exclusively by mechanical or other physical processes under conditions without altering the oil, which have not undergone any technological operation other

than rinsing, decanting, centrifugation or filtration, excluding oils obtained by the use of solvents or by the use of auxiliary substances characterized by chemical or biochemical action or by processes of re-esterification, and any mixtures with oils of other kinds (Point 1 of Part VIII of Annex VII of the CMO Regulation). Virgin olive oils are classified under the CMO Regulation as extra-virgin, virgin, and lampante virgin olive oil. Lampante virgin olive oil may not be placed on the market for sale to the final consumer. It is mainly used for technical purposes or refined. Extra-virgin olive oil is considered the highest quality based on chemical parameters, particularly total acidity. In the case of extra-virgin olive oil, this value must be less than 0,8 %, virgin olive oil less than 2 %, olive oil less than 1,5 %, and lampante olive oil more than 2 % [15].

The only extra-virgin olive oil and virgin olive oil, as single-ingredient foodstuffs, that are offered for sale to consumers on their own (not as an ingredient of another foodstuff) will be the subject of our interest hereafter. We are talking about so-called table virgin olive oils. The legislation outlines specific rules for labeling these olive oils. Extra-virgin and virgin olive oils can also be added to other foods as ingredients, and the delegated regulation for olive oil lays down additional rules for their labeling as food ingredients. However, this issue will not be of interest to us.

Objectives

This paper's objective is to provide a comprehensive review of the European Union's legal framework governing the labeling of extra-virgin and virgin table olive oils. It focuses on mandatory and voluntary labeling requirements, including food naming, oil category, storage conditions, place of origin, and optional quality terms. The study analyzes relevant EU legislation, case law, and Codex Alimentarius standards to identify legal obligations, highlight practical challenges, and propose interpretative solutions for food business operators and control authorities.

MATERIAL AND METHODOLOGY

The subject of this paper is the identification of legislation at national and supranational levels that contains the legal regulation of the labeling of extra-virgin and virgin table olive oils. The individual legal standards are obtained from www.eur-lex.eu, the official website of the European Union, which provides access to European Union legal acts, other relevant documents, and official information published in the Official Journal of the European Union. We draw particular attention to the FIC Regulation, CMO Regulation, Delegated Regulation for olive oil, and related legal acts. The subject matter of the uniform regulations is then analyzed and interpreted using traditional methods of legal analysis and legal-hermeneutical methods, emphasizing the linguistic and systematic interpretation of the legal texts. The legislation concerned is analyzed systematically within the logical structure of classical legal dogmatics, which comprises a systematic set of legal institutes, legal norms, and the consistent results of legal application and implementation practice. The findings of practice are subsumed under specific hypotheses of legal norms. At the same time, the logical syllogism is used to deduce legally established dispositions and sanctions, tied to the fulfillment of the hypotheses of legal norms. Given the interdisciplinary nature of the paper, the system of legal dogmatics regarding the labeling of extra-virgin and virgin table olive oils is examined and, where appropriate, supplemented with current legal and food doctrine.

RESULTS AND DISCUSSION

Legislation on the labeling of extra-virgin and virgin olive oils

The labeling of extra-virgin and virgin olive oils can be divided into horizontal and vertical legislation [16]. Horizontal legislation, which generally applies to all types and categories of foodstuffs, is primarily contained in the FIC Regulation and related legislation. For example, Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods. This legislation also applies to the labeling of extra-virgin and virgin olive oils.

The vertical labeling of extra-virgin and virgin olive oils is primarily governed by the CMO Regulation, which establishes the Common Agricultural Policy of the European Union. Marketing standards are part of the European Union's Common Agricultural Policy. Marketing standards are defined as rules designed to ensure that agricultural products of standardized quality are supplied to a single market [17]. They aim, above all, to take account of consumer expectations, contribute to improving the economic conditions for the production and marketing of agricultural products, and enhance their quality [18]. Marketing standards are important because they establish binding rules for specific sectors and products, including agricultural products, for which marketing standards have been established. These products may be marketed in the European Union only if they comply with these standards. Marketing standards may only apply to the sectors and products listed in Article 75(1) of the CMO Regulation and the wine sector under Article 75(4) of the CMO Regulation. Marketing standards may

be adopted for the olive oils and table olives industry or the products of this sector following Article 75(1)(a) of the CMO. The regulation of marketing standards can be divided into:

- (a) marketing standards in the strict sense,
- (b) definitions, designations, and trade names; and
- (c) optional reserved terms.

Following Article 75(2) of the CMO, the European Commission has adopted marketing standards in the narrower sense for olive oil in the Delegated Regulation for olive oil. In addition to the marketing standards in the narrower sense for olive oil, the marketing standards of the European Union's Common Agricultural Policy also include regulations on definitions, designations, and sales denominations. The following definitions, designations, and sales denominations for the olive oil and table olive sector are those pursuant to Article 78(1) of the CMO Regulation. They are contained in Annex VII of the CMO Regulation. A distinction is also made between definitions (technical definitions), designations, and sale descriptions under Article 75(3)(a) of the CMO Regulation. The definitions, designations, or sales descriptions laid down in Annex VII of the CMO Regulation may only be used to market products that comply with the requirements. Finally, optional reserved terms are also provided for olive oils and table olives from the olive oil and table olive sector in Annex IX of the CMO Regulation. The optional reserved terms have been created to facilitate the communication of these qualities or characteristics within the internal market (in particular to consumers) by producers of agricultural products with characteristics or attributes that represent an added value, and also to support and complement specific marketing standards (Article 84 of the CMO Regulation). The vertical labeling of extra-virgin and virgin olive oils is also complemented by legislation in Commission Implementing Regulation (EU) 2022/2105 of 29 July 2022 laying down rules on conformity checks of marketing standards for olive oil and methods of analysis of the characteristics of olive oil (hereinafter referred to as the 'Implementing Regulation for olive oil'). The Implementing Regulation for olive oil was last amended by Commission Implementing Regulation (EU) 2024/2707 of 21 October 2024, amending Implementing Regulation (EU) 2022/2105 laying down rules on conformity checks of marketing standards for olive oil and methods of analysis of the characteristics of olive oil.

In particular, the international Codex Alimentarius standards can also be cited as a source. The Codex Alimentarius Commission is a major regulatory body worldwide, part of the Food and Agriculture Organization (FAO) and the World Health Organization (WHO). The Codex Alimentarius Commission develops Codex Alimentarius standards applied in 185 countries worldwide. Codex Alimentarius standards set standards for all food products traded worldwide, based on hygiene, additives, food labeling, and many other aspects [19]. It should be noted, however, that the Codex Alimentarius Commission's measures are not binding at the national level or on individual states in the international community [20]. They are, however, considered to be standards for the scientific assessment of food safety [21]. Compliance with them constitutes a presumption of compliance with international law [22]. Concerning the labeling of extra-virgin and virgin olive oil, in particular, the Standard for Olive Oil and Olive Pomace Oil CXS 33-1981 and the General Standard for the Labelling of Pre-packaged Foods CXS 1-1985 will be of relevance.

The European Union, Slovakia, and the Czech Republic are members of the International Olive Council (IOC) [23]. The International Olive Council is an international organization established to implement the provisions of the 2015 International Olive Oil and Table Olive Agreement [24], which replaced the 2005 International Olive Oil and Table Olive Agreement [25]. However, the International Olive Council itself, as an international organization, was established in 1959 and is based in Madrid, Spain. Today, the International Olive Council members cover up to 95% of global olive oil production [26]. The International Olive Council, through its Council of Members, establishes marketing standards applicable to olive oils, olive pomace oils, and table olives. The International Olive Council has adopted marketing standards covering olive and pomace oil [27]. The European Union, as a member of the International Olive Council, regularly aligns European Union standard-setting with those marketing standards, most recently by Commission Delegated Regulation (EU) 2024/1401 of 7 March 2024 amending Delegated Regulation (EU) 2022/2104 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards marketing standards for olive oil and by Commission Implementing Regulation (EU) 2024/2707 of 21 October 2024 amending Implementing Regulation (EU) 2022/2105 laying down rules on conformity checks of marketing standards for olive oil and methods of analysis of the characteristics of olive oil.

Labelling of extra-virgin and virgin olive oils

The basic definition of extra-virgin olive oil is contained in the CMO Regulation and extra-virgin olive oil is considered to be virgin olive oil whose free acidity, expressed as oleic acid, is no more than 0,8 g per 100 g and whose other characteristics are following those laid down in the Delegated Regulation for olive oil, in particular in point 1 of Tables A and B of Annex I to the Delegated Regulation for olive oil (Point 1(a) of Part VIII of Annex VII of the CMO Regulation). Virgin olive oil means virgin olive oil whose free acidity, expressed as oleic acid, is not more than 2 g per 100 g and whose other characteristics are following those laid down in the Delegated Regulation for olive oil, in particular in point 2 of Tables A and B of Annex I to the Delegated Regulation for olive oil (Point 1(b) of Part VIII of Annex VII of the CMO Regulation). The characteristics (properties) of olive oils set out in Annex I to the Delegated Regulation for olive oil shall be determined by the Implementing Regulation for olive oil (Article 2(2) of the Delegated Regulation for olive oil).

These definitions are relevant concerning the labeling of olive oils, in particular concerning the correct indication of the mandatory indication of the name of the foodstuff according to Article 9(1)(a) of the FIC Regulation. In the context of the above definitions of extra-virgin and virgin olive oil, the question arises whether these oils may be placed on the market with the mandatory designation '*extra-virgin olive oil*' or '*virgin olive oil*' if a flavoring ingredient such as spices or lemon has been added to them. The answer to this question is negative. This is because such food no longer meets the definition of extra-virgin and virgin olive oil, which are considered single-component foods derived from the fruit of the olive tree. This fact is made explicit in Article 12(6) of the delegated regulation on olive oil, according to which the resulting foodstuffs may not be labeled with any of the names provided for in the legislation referred to in Article 6 if other foodstuffs are added to the oils referred to in Article 1(b). In such cases, the official food control body in the Czech Republic offers, as a solution, the possibility of indicating the name of the food, for example, '*dressing with extra-virgin olive oil*' [28].

It may be noted in passing that both extra-virgin and virgin olive oils, as is also clear from the case law of the Court of Justice of the European Union, may only be sold to the final consumer in packaged form [29]. At the same time, those olive oils must be offered for sale to the final consumer in packages of not more than 5 liters. These packages must have a closed system that cannot be permanently closed after the first opening (Article 4(1) of the Delegated Regulation for olive oil). These rules have been adopted to ensure the authenticity of the olive oils sold. The official food control authorities have noted a tendency of food business operators to offer poured extra-virgin and virgin olive oil for sale to consumers. However, such sales to the final consumer must comply with Article 4(1) of the Delegated Regulation for olive oil. Therefore, if a food business operator wishes to offer for sale to consumers extra-virgin or virgin olive oil from other larger containers, he must bottle that olive oil in containers fitted with an opening system that cannot be permanently closed after the first opening and which have a maximum capacity of 5 liters [30]. This packaging of olive oil will also have to be labeled with the relevant compulsory information.

In restaurants, hospitals, canteens, and other similar establishments, Member States may set a maximum packaging volume for extra-virgin and virgin olive oil of more than 5 liters, also depending on the type of establishment concerned (Article 4(2) of the Delegated Regulation for olive oil). To date, neither Slovakia nor the Czech Republic has adopted such legislation.

Selected mandatory information on extra-virgin and virgin olive oil

Mandatory food information is defined in the FIC Regulation as the information required to be provided to the final consumer by European Union regulations (Article 2(2)(c) of the FIC Regulation). The mandatory information must be available and easily accessible, except for non-prepacked foods. They shall be prominently displayed in such a way as to be visible, clearly legible, and, where necessary, indelible [31]. The compulsory information on extra-virgin and virgin olive oil contained in European Union rules can be divided into the information which the FIC Regulation requires to be provided to the final consumer and the compulsory information on foodstuffs which is determined by specific European Union rules, in our case in particular the CMO Regulation, the Delegated Regulation for olive oil and, in part, the Implementing Regulation for olive oil. Incidentally, the imposition of additional food information may also be found in the national legislation of the Member States of the European Union. National legislation in Member States may require additional mandatory food information to the final consumer [32]. However, in this context, it should be noted that Decree No. 424/2012 Coll. of the Ministry of Agriculture and Rural Development of the Slovak Republic, which lays down requirements for edible vegetable fats and edible vegetable oils and their products, does not apply to olive oils [33].

The mandatory food information set out in the FIC Regulation can be divided into compulsory particulars, as outlined in Article 9(1) of the FIC Regulation, and compulsory additional particulars for specific food types and

categories. The list of mandatory details is set out in Article 9(1)(a) to (l) of the FIC Regulation [34]. Mandatory particulars under Article 9(1) of the FIC Regulation must be provided with the food, with specified exceptions.

The mandatory particulars under Article 9(1) of the FIC Regulation are:

- (a)** The name of the foodstuff; The name of the foodstuff as a mandatory indication under Article 9(1) of the FIC Regulation for extra-virgin and virgin olive oils will be discussed below in the text of the paper.
- (b)** The list of ingredients: Extra-virgin and virgin olive oil can be considered as so-called single-ingredient foods - foods composed of a single ingredient. This fact follows from the very definition of virgin olive oil in the CMO Regulation (Point 1 of Part VIII of Annex VII of the CMO Regulation). No additives may be added to extra-virgin and virgin olive oils under Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives. For single-ingredient foods, there is no obligation to list the ingredients of the food. However, the omission of the list of ingredients is not mandatory. It is always up to each food business operator to decide whether or not to include a list of ingredients on a food. For example, on (extra) virgin olive oil, the list of ingredients may read: 'Ingredients: (extra) virgin olive oil'.
- (c)** a list of substances and products causing allergy or intolerance; Food allergy is defined as an adverse health effect resulting from a specific immune reaction that occurs repeatedly on exposure to a given food, and food intolerance is a non-immune reaction involving metabolic, toxic, pharmacological, and undefined mechanisms [35]. In the case of food allergies, the immune system recognizes certain food proteins as allergens and produces an immune response that causes various allergic reactions. The prevalence of food allergy in the population ranges from 0.5 to 9 % and has adverse health consequences, especially for adolescents [36]. However, substances and products causing allergies or intolerances are not encountered in labeling extra-virgin and virgin olive oil.
- (d)** The quantity of certain ingredients or categories of ingredients. The requirements laid down in the FIC Regulation for the indication of the amount of certain ingredients and categories of ingredients do not apply to foods composed of a single ingredient, which are also extra-virgin and virgin olive oils. The quantity of the single ingredient shall always correspond to 100%. However, the following optional indication may be encountered in food practice: 'Ingredients: 100 % (extra) virgin olive oil'.
- (e)** The net quantity of the foodstuff; the net quantity of the foodstuff in the case of liquids, which shall include extra-virgin and virgin olive oil, shall be indicated in units of volume - liters, centiliters, or milliliters (Article 23(1)(a) of the FIC Regulation). For extra-virgin and virgin olive oils, in practice, the net quantity is usually indicated in liters or milliliters.
- (f)** The date of minimum durability or use-by date; the date of minimum durability shall be indicated on extra-virgin and virgin olive oil. This is because they are not microbiologically perishable foodstuffs and therefore may pose an immediate danger to human health after a short period. They would then have to be labeled with a use-by date. The date of minimum durability is the date until which the foodstuff if properly stored, retains its specific characteristics (Article 2(2)(r) of the FIC Regulation). The date of minimum durability shall consist of a day, a month, and a year. This order must be maintained and must not be in coded form. The date of minimum durability shall be indicated on the packaging of the foodstuff by the words '*Best before*' (if the date of minimum durability also includes a day) or '*Best before end*' (if the date of minimum durability does not include a day but only a month and a year or only a year). These words are either followed by the date itself or by a reference to where the date is indicated on the packaging or attached label of the foodstuff, e.g. '*see the neck of the bottle*'.
- (g)** Any special storage conditions and conditions of use; Special storage conditions as a mandatory indication under Article 9(1) of the FIC Regulation will be addressed later in the paper.
- (h)** The name or business name and address of the food business operator;
- (i)** The country of origin or place of provenance, where provided for in Article 26 of the FIC Regulation; the country of origin shall be the place or region from which the goods were obtained. Where products are produced in more than one country, the country of origin shall be determined as the country or territory where the last substantial, economically justified processing took place. The place of origin is any place from which the foodstuff is said to originate and which is not the country of origin [37]. Extra-virgin and virgin olive oil must indicate the place of origin. The indication of the place of origin as a compulsory indication under Article 9(1) of the FIC Regulation in conjunction with Article 8 of the Delegated Regulation for olive oil will be dealt with below in the text of the paper.
- (j)** Instructions for use, if it would be difficult to use the foodstuff correctly without such instructions; instructions for use of extra-virgin or virgin olive oil are generally not given.
- (k)** In the case of beverages containing more than 1,2 % by volume of alcohol, the actual alcoholic strength by volume; the compulsory indication referred to in Article 9(1) of the FIC Regulation shall not apply to extra-virgin and virgin olive oils as they do not contain alcohol.
- (l)** Nutritional information; Nutritional information shall be compulsory on extra-virgin and virgin olive oil.

In addition to the mandatory particulars under Article 9(1) of the FIC Regulation, the FIC Regulation also provides for compulsory additional particulars for specific types or categories of food [38]. The additional mandatory particulars for specific types and categories of food are listed in Annex III of the FIC Regulation. However, they are not used in the labeling of extra-virgin and virgin olive oil.

As mentioned above, mandatory food information is also provided for by specific European Union regulations (in addition to the FIC Regulation), in our case, in particular, the CMO Regulation, the Delegated Regulation for olive oil, and partly the Implementing Regulation for olive oil. Concerning extra-virgin and virgin olive oil, specific rules apply for the indication of the following mandatory particulars:

- (a) the name of the food,
- (b) information on the category of oil,
- (c) specific storage conditions,
- (d) the place of origin; and
- (e) the packing center number.

Legal name and labeling of categories of oils

The name of a food serves as an indication that helps consumers quickly identify the food and its characteristics. It also distinguishes the food from other types and categories of food. From a legal point of view, the name of the food is a compulsory indication under Article 9(1) of the FIC Regulation (Article 9(1)(a) of the FIC Regulation), which must appear on the pre-packed food. This rule also applies to extra-virgin and virgin olive oil. The legal regulation of food names is detailed in Article 17 of the FIC Regulation. Annex VI of the FIC Regulation then contains selected specific provisions on the name of the food and on the mandatory particulars that must accompany the name of the food. It applies that no food may be designated by any name invented by the manufacturer or distributor. The use of various invented names for foodstuffs is explicitly prohibited in the legislation (Article 17(4) of the FIC Regulation). The legislation outlines precise procedures for determining the name of a foodstuff, as well as specific names of foods.

The name of the food is a mandatory indication of the food under the FIC Regulation, which must be used to label the food. This also applies, for example, to so-called small food packages. According to the legislation, there are three types of food names. The legal name of the food (legal name of the food), the customary name of the food, and the descriptive name of the food (Article 17(1) of the FIC Regulation). About the labeling of extra-virgin and virgin olive oil, only the legal name of the food may be used as the mandatory indication of the name of the food pursuant to Article 9(1) of the FIC Regulation (Article 6(1) of the Delegated Regulation for olive oil). In determining the legal name of a foodstuff, reference should be made to the description of olive oils in Part Eight of Annex VII of the CMO Regulation (Article 6(1) and Article 1(b) of the Delegated Regulation for olive oil).

In addition to the designation of extra-virgin and virgin olive oil as a legal food name, these oils must also be labeled with information on the oil category (olive oil or olive pomace oil). The information on the oil category is determined by specific European Union rules (other than the FIC Regulation) in terms of the breakdown of mandatory food information. In our case, this specific regulation is the Delegated Regulation for olive oil. According to Annex VI of the FIC Regulation, the information on the oil category is therefore not a mandatory indication that must accompany the name of the food. The packaging or the accompanying label of extra-virgin olive oil must also bear, in clear and indelible characters, the following information on the oil category: *'olive oil of the selected category, obtained directly from olives and exclusively by mechanical means'*. In the case of virgin olive oil, the label must state the category of the olive oil in the following wording: *'olive oil obtained directly from olives and exclusively by mechanical means'*. The standard-setter lays down in the delegated regulation the precise wording of the information on the oil category, which may not be changed or modified, even if the content of the information on the category of oil is maintained in terms of meaning. However, the mandatory information on the oil category does not necessarily have to be given close to the name of the food. This also distinguishes it from the compulsory particular accompanying the name of the food under Annex VI of the FIC Regulation.

The legal name of the foodstuff of extra-virgin and virgin olive oil must be indicated in the main field of vision according to the FIC Regulation (Article 5(2) of the Delegated Regulation for olive oil). The principal field of vision of food packaging is the field of vision that the consumer is most likely to see first when making a purchase, and which will enable them to identify the product immediately in terms of its nature and characteristics, and also the trademark, if any, of the product. Where a package has several identical main fields of vision, the main field of vision shall be that determined by the food business operator (Article 2(2)(1) of the FIC Regulation). The name of the extra-virgin and virgin olive oil foodstuff shall appear in the main field of vision at the same time as the place of origin of the extra-virgin and virgin olive oil as a homogeneous block of text (e.g. same font, same size, same color, etc.). These rules shall not apply to the information on the category of oil.

Specific storage conditions for extra-virgin and virgin olive oil

As a general rule with food labeling, not every food is obliged to have the storage conditions of that food indicated on the packaging or on an accompanying label. Only the specific storage conditions are mandatory under the FIC Regulation (Article 9(1)(g) of the FIC Regulation). Therefore, storage conditions must only be compulsorily indicated on prepacked food under the FIC Regulation if the food requires specific storage conditions. The specific storage conditions of the food, if not laid down in the legislation, are determined by the manufacturer or importer of the food. Specific regulations (other than the FIC Regulation) can and do specify specific special storage conditions for selected types or categories of food. This is also the case for extra-virgin and virgin olive oil, for which specific storage conditions must always be indicated.

Various factors may influence the characteristics and chemical composition of extra-virgin and virgin olive oils, with storage conditions being a significant factor [39]. In particular, storage can significantly affect the oxidative stability of extra-virgin and virgin olive oils, which is one of the main causes of its degradation and can be accelerated in the presence of light (photo-oxidation) and enzymes (enzymatic oxidation) [40]. The specific storage conditions on extra-virgin and virgin olive oil must therefore include information to protect these olive oils from light and heat (Article 7 of the Delegated Regulation for olive oil). For example, by stating: *'Protect from heat and direct sunlight'*. Or *'Protect from heat and light'*. The specific form of the verbal expression of the specific storage conditions for extra-virgin and virgin olive oil is not laid down in the delegated Regulation for olive oil. Various optional recommendations for consumers in relation to the storage of extra-virgin or virgin olive oils can also be encountered in food practice. For example, *'Do not store in a refrigerator'* or *'Store at room temperature'* etc. In this context, various optional warnings for consumers may also be encountered in the case of refrigerated storage of extra-virgin or virgin olive oil. For example: *'Cold haze formed during storage in a refrigerator is not a quality defect, it disappears at room temperature'*. Or *'At temperatures of 7 °C and below, cloudiness may occur'*.

Place of origin of extra-virgin and virgin olive oil

Consumers are increasingly interested in knowing the origin of their food, and several citizens' initiatives have been registered within the European Union to make origin labeling mandatory for all types of food, to prevent fraud, protect public health, and ensure consumers' right to information [16]. It is not compulsory to indicate the place of origin on all categories of olive oil. Only extra-virgin olive oil and virgin olive oil are obliged to indicate the place of origin (Article 8(1) of the Delegated Regulation for olive oil). The rules for determining the place of origin of extra-virgin and virgin olive oil originating in European Union countries are laid down in the Delegated Regulation for olive oil. The place of origin indicating the Member State or the European Union must correspond to the geographical area in which the olives were harvested and in which the mill where the oil was extracted (pressed) from the olives is located (Article 8(6) of the Delegated Regulation for olive oil). For example, if the place of origin of the extra-virgin olive oil indicated on the label is Italy, the olives used to produce this olive oil must have been harvested in Italy, and the mill where the olive oil was extracted from these harvested olives must also be located in Italy. In the case of imports of extra-virgin and virgin olive oil from third countries, the place of origin shall be determined following the rules laid down in the European Union Customs Code (Article 8(5) of the Delegated Regulation for olive oil).

Where the olives have been harvested in a Member State or in a third country other than the country in which the mill where the olive oil has been extracted from those harvested olives is located, the place of origin of the extra-virgin or virgin olive oil shall contain the following text: *'(extra) virgin olive oil obtained in (Union or the name of the Member State or third country concerned) from olives harvested in (Union or the name of the Member State or third country concerned)'* (Article 8(7) of the Delegated Regulation for olive oil). For example, *'extra-virgin olive oil obtained in the Slovak Republic from olives harvested in Italy'* if the olive oil mill is located in Slovakia and the extra-virgin or virgin olive oil is extracted therefrom olives harvested in Italy.

Suppose the olive oil originates in one Member State or a third country following the rules for determining the place of origin of olive oil described above. In that case, the place of origin shall be indicated by reference to that Member State (e.g. *'Place of origin: Spain'*), the European Union (e.g. *'Place of origin: EU'* or *'Place of origin: European Union'*) or a third country (e.g. *'Place of origin: Tunisia'*) (Article 8(3)(a) of the Delegated Regulation for olive oil). In the case of olive oil blends originating in more than one Member State or third country, the place of origin shall be indicated as follows:

- (a) *'olive oil blend originating in the European Union' or from a reference to the European Union (e.g. 'Place of origin: EU countries'),*
- (b) *'blend of olive oils not originating in the European Union' or from a reference to an origin other than that of the European Union',*

(c) 'mixture of olive oils from the Union and olive oils not originating in the Union' or from a reference to an origin from the Union and an origin other than that of the European Union'.

The indication of the place of origin of extra-virgin or virgin olive oil may also consist of the indication of a protected designation of origin or a protected geographical indication as provided for in 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 specialties 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 (originally Regulation (EU) No 1151/2012 of the European Parliament and of the Council of 21 November 2012 on agricultural product and food quality schemes). It is necessary to underline the fact that the Regulation grants protection to geographical indications entered in the Union register of geographical indications even if they constitute an ingredient of a foodstuff. As can be seen from Article 27(1) of the Regulation, where a protected geographical indication is used as an ingredient in a processed product, it may appear in the name of the product, on its label or in advertising, provided that the product does not contain any other comparable ingredient, the ingredient with the geographical indication is present in sufficient quantity to affect the characteristics of the product and the percentage of that ingredient is indicated on the label. Protected geographical indications and protected designations of origin have been established in the European Union for a long time. Such designations not only express the product's origin but also codify the product's specifications which guarantee its specific characteristics [41].

For example, where extra-virgin olive oil bears the registered protected designation of origin '*Terre Aurunche*' [42], it is not compulsory to indicate on the packaging of that extra-virgin olive oil the place of origin of the extra-virgin olive oil, as the indication of the protected designation of origin replaces the compulsory indication of the place of origin of the extra-virgin or virgin olive oil, as provided for in Article 8 of the Delegated Regulation for olive oil (Article 8(3)(c) of the Delegated Regulation for olive oil). The following table shows the registered protected geographical indications concerning virgin olive oils in the European Union (including pending registration applications). All these geographical indications apply only to extra-virgin olive oils. There are countless more protected designations of origin registered in respect of virgin olive oils. Examples from the last two years include the protected designations of origin '*Aydın Memecik Zeytinyağı*' (Turkey) [43], '*Huile d'olive du Languedoc*' (France) [44], and '*Aceite Villuercas Ibores Jara*' (Spain) [45].

Table 1 Protected geographical indications in relation to virgin olive oils in the European Union.

Name of the protected geographical indication	Legal act	Country of registration
Κεφαλονιά / Kefalonia Λέσβος / Μυτιλήνη / Lesbos / Mytilini Λακωνία / Lakonia Θάσος / Thassos Πρέβεζα / Preveza Ολυμπία / Olympia Ρόδος / Rodos Χανιά Κρήτης / Chania Kritis	Commission Regulation (EC) No 1107/96 of 12 June 1996 on the registration of geographical indications and designations of origin under the procedure laid down in Article 17 of Council Regulation (EEC) No 2081/92	Greece
Toscana	Commission Regulation (EC) No 644/98 of 20 March 1998 supplementing the Annex to Regulation (EC) No 1107/96 on the registration of geographical indications and designations of origin under the procedure laid down in Article 17 of Council Regulation (EEC) No 2081/92	Italy
Ζάκυνθος / Zakynthos Σάμος / Samos	Commission Regulation (EC) No 1549/98 of 17 July 1998 supplementing the Annex to Regulation (EC) No 1107/96 on the registration of geographical	Greece

	indications and designations of origin under the procedure laid down in Article 17 of Council Regulation (EEC) No 2081/92	
Άγιος Ματθαίος Κέρκυρας / Agios Mattheos Kerkyras	Commission Regulation (EC) No 1845/2004 of 22 October 2004 supplementing the Annex to Regulation (EC) No 2400/96 on the entry of certain names in the ‘Register of protected designations of origin and protected geographical indications’ (Tergeste, Lucca, Miele della Lunigiana and Άγιος Ματθαίος Κέρκυρας (Agios Mathaios Kerkyras))	Greece
Sicilia	Commission Implementing Regulation (EU) 2016/1662 of 12 September 2016 entering a name in the register of protected designations of origin and protected geographical indications (Sicilia (PGI))	Italy
Olio di Calabria	Commission Implementing Regulation (EU) 2016/2301 of 8 December 2016 entering a name in the register of protected designations of origin and protected geographical indications (Olio di Calabria (PGI))	Italy
Marche	Commission Implementing Regulation (EU) 2017/702 of 4 April 2017 entering a name in the register of protected designations of origin and protected geographical indications (Marche (PGI))	Italy
Olio di Puglia	Commission Implementing Regulation (EU) 2019/2202 of 16 December 2019 entering a name in the register of protected designations of origin and protected geographical indications (Olio di Puglia (PGI))	Italy

Κριτσά / Kritsa	Commission Implementing Regulation (EU) 2019/2205 of 16 December 2019 entering a name in the register of protected designations of origin and protected geographical indications [Κριτσά (Kritsa) (PGI)]	Greece
Aceite de Jaén	Commission Implementing Regulation (EU) 2020/665 of 13 May 2020 entering a name in the register of protected designations of origin and protected geographical indications ('Aceite de Jaén' (PGI))	Spain
Olio lucano	Commission Implementing Regulation (EU) 2020/1389 of 28 September 2020 entering a name in the register of protected designations of origin and protected geographical indications 'Olio lucano' (PGI)	Italy
Aceite de Ibiza / Oli d'Eivissa	Commission Implementing Regulation (EU) 2020/1527 of 21 October 2020 entering a name in the register of protected designations of origin and protected geographical indications ('Aceite de Ibiza'/'Oli d'Eivissa' (PGI))	Spain
Olio di Roma	Commission Implementing Regulation (EU) 2021/1261 of 26 July 2021 entering a name in the register of protected designations of origin and protected geographical indications ('Olio di Roma' (PGI))	Italy
Olio Campania	Commission Implementing Regulation (EU) 2023/666 of 16 March 2023 entering a name in the register of protected designations of origin and protected geographical indications ('Olio Campania' (PGI))	Italy
Oli de Menorca / Aceite de Menorca	Commission Implementing Regulation (EU) 2025/118 of 14 January 2025 on the registration of the geographical indication Oli de Menorca / Aceite de Menorca	Spain

(PGI) in the Union register of geographical indications pursuant to Regulation (EU) 2024/1143 of the European Parliament and of the Council

Κρήτη / Kriti

Application for registration submitted.

Greece

The European Union acceded to the Geneva Act of the Lisbon Agreement on Appellations of Origin and Geographical Indications in 2019, following the Council Decision (EU) 2019/1754 of 7 October 2019 on the accession of the European Union to the Geneva Act of the Lisbon Agreement on Appellations of Origin and Geographical Indications. Both the Czech Republic and the Slovak Republic have been party to the Lisbon Agreement on the Protection of Appellations of Origin and their International Registration since 1993 as successor states, while the Czech and Slovak Federative Republic has been party to the Agreement since 1961. In the context of the European Union's accession, a Regulation was adopted laying down the rules and procedures concerning the European Union's activities following its accession to the Geneva Act of the Lisbon Agreement on Appellations of Origin and Geographical Indications [46]. Based on that Regulation and following the procedures laid down therein, protection has been granted in the European Union for the registration of the designation of origin 'Huile d'Olive Téboursouk' (Turkey) [47] in respect of olive oil, the indication of which on the packaging of extra-virgin and virgin olive oil also replaces the indication of its place of origin pursuant to Article 8 of the Delegated Regulation for olive oil.

The place of origin of extra-virgin and virgin olive oil (e.g. '*Place of origin: Spain*' or '*Place of origin: EU countries*') and not the country of origin (e.g. '*Country of origin: Spain*') should always be indicated on the packaging or on the label, following the legislation of the Delegated Regulation for olive oil. The place of origin of extra-virgin and virgin olive oil is determined in the delegated regulation for olive oil according to criteria different from the country of origin of the food under the FIC Regulation and related legislation.

The place of origin, which is compulsorily indicated on extra-virgin and virgin olive oil, must be indicated in the main field of vision, together with the legal name (Article 5(2) of the Delegated Regulation for olive oil). The principal field of vision of food packaging is the field of vision that the consumer is most likely to see first when buying and which allows him to identify the product immediately in terms of its nature and characteristics and also the trademark, if any. Where a package has several identical main fields of vision, the main field of vision shall be that determined by the food business operator (Article 2(2)(l) of the FIC Regulation). The legal name and the place of origin of extra-virgin and virgin olive oil must be given in full and as a homogeneous block of text.

Extra-virgin and virgin olive oil packing number

Member States have the possibility (but not the obligation) to approve olive oil and olive pomace oil packaging plants located in their own territory, following Article 6(1) of the Implementing Regulation for olive oil. If a Member State chooses to apply this authorization on its territory, it shall approve any packaging plant that so requests, provided that it meets the conditions. The olive oil or olive-pomace oil packaging plant must have its packing facilities, undertake to collect and keep the documentation provided for in the Implementing Regulation for olive oil, and have a storage system that makes it possible to check the origin of the extra-virgin and virgin olive oils (Article 6(2) of the Implementing Regulation for olive oil). Neither the Slovak nor Czech Republic applies this authorization under the Implementing Regulation for olive oil.

Where the extra-virgin or virgin olive oil comes from a packaging plant that has been approved and therefore allocated an alphanumeric packaging center code, the indication of the packaging plant number is compulsory information. Hence, the packing center number must appear on the packaging or on the accompanying label of all extra-virgin and virgin olive oil coming from an approved packing center. The packing plant number shall be given as an alphanumeric packaging plant code.

Selected voluntary information on extra-virgin and virgin olive oil

The definition of voluntary food information can be derived from Article 36(2) of the FIC Regulation. Voluntary food information is information that is provided voluntarily, i.e. European Union legislation (or national law) does not impose an obligation to provide it to the final consumer. Food business operators provide it voluntarily. It should be underlined that, according to Article 36(2)(a) of the FIC Regulation, voluntary food information is subject to the same rules of fair information practices as those laid down in Article 7(1) of the FIC

Regulation. This means that voluntary food information must not mislead the consumer in the same way as mandatory food information [16].

The Delegated Regulation for olive oil provides for the following voluntary indications which may be used for the labeling of table extra-virgin and virgin olive oils:

- (a) optional reserved terms and
- (b) an indication of the year of harvest (Article 5(3) of the Delegated Regulation for olive oil).

Optional reserved terms for extra-virgin and virgin olive oil

As part of the legal regulation of the marketing standards of the common agricultural policy of the European Union, the use of optional reserved terms is also regulated. This legislation applies to the poultrymeat sector, the egg sector, and the olive oils and table olives sector. As these are optional reserved terms, their use on foodstuffs is not compulsory. The legislation on the use of optional reserved terms for olive oils is contained in the CMO Regulation. The optional reserved terms listed in Annex IX of the CMO Regulation in relation to olive oil can be divided into:

- (a) The optional reserved term '*first cold pressing*'; this optional reserved term may only be used on extra-virgin and virgin olive oils if they have been obtained at a temperature below 27 °C from the first mechanical pressing of olive paste by the traditional extraction method using hydraulic presses.
- (b) The optional reserved term '*cold extraction*'; that optional reserved term may also be used only to designate extra-virgin and virgin olive oils which have been obtained at a temperature below 27 °C by precooling (cold leaching) or centrifugation of the olive paste.
- (c) Optional reserved terms indicating the organoleptic characteristics of the oils relating to taste and aroma may appear only on extra-virgin and virgin olive oils. The positive attributes of extra-virgin and virgin olive oils are fruitiness, bitterness, and pungency. Depending on the intensity of the perception of the positive attributes of extra-virgin and virgin olive oils, the terms '*robust*', '*medium*', and '*delicious*' can be distinguished. The term '*balanced*' can also be encountered (Annex II of the Delegated Regulation for olive oil).
- (d) An indication of the maximum acidity expected at the date of minimum durability of the olive oil. In addition to extra-virgin and virgin olive oils, this optional reserved term may also be used to designate olive oils composed of refined olive oils virgin olive oils, and olive pomace oils. Together with the indication of the maximum acidity expected on the date of minimum durability of the olive oil, the maximum peroxide value, the wax content, and the ultraviolet absorption determined following the Implementing Regulation for olive oil must be indicated in the same field of vision in the same font size (Article 10(d) of the Delegated Regulation for olive oil).

Indication of the year of harvest of extra-virgin and virgin olive oil

Olives are traditionally harvested by hand, a process that is lengthy and laborious and accounts for the major share of the cost of olive oil production [48]. Mechanical olive harvesting is used to a limited extent in more intensive orchards. It is reported that the maximum oil content occurs between 60 and 75 days after the start of ripening [49].

The indication of the year of harvest is an optional indication under Article 11 of the Delegated Regulation for olive oil, which can only be indicated on extra-virgin and virgin olive oil. For other categories of olive oils, the harvest year may not be indicated, even voluntarily. The year of harvest may be indicated on extra-virgin and virgin olive oil only if 100% of the content comes from that harvest (Article 11(2) of the Delegated Regulation for olive oil). The year of harvest shall be indicated on extra-virgin and virgin olive oil in the form of the marketing year concerned. The marketing year for olive oil in the olive oil and table olive sector of the common agricultural policy of the European Union shall be from 1 October to 30 September of the following year (Article 6(f) of the CMO Regulation). The year of harvest may also be given in the form of the month and the year of harvest respectively. The month must correspond to the month in which the olive oil is extracted from the olives (and therefore does not necessarily correspond to the actual harvest of the olives).

Member States may, but shall not be obliged to, following Article 11(3) of the Delegated Regulation for olive oil, decide that the packaging or the label accompanying extra-virgin and virgin olive oils shall also be required to indicate the year of harvest if 100 % of the content comes from that harvest and if those olive oils are of their domestic production, are obtained from olives harvested on their territory and those olive oils are destined for their national market. In this case, the harvest year shall be compulsory food information under the specific rules - delegated Regulation for olive oil. Member States are obliged to notify the European Commission if they use this decision option. The Czech Republic and Slovakia have not applied this provision [50].

CONCLUSION

Extra-virgin and virgin table olive oils are labeled with a complex interplay of general and sector-specific European Union legislation. Core labeling obligations arise from the FIC Regulation. At the same time, detailed rules explicitly tailored to olive oils are laid down in the CMO Regulation, the Delegated Regulation for olive oil, and the Implementing Regulation. The labeling must include precise legal names, clearly defined categories of oils, specific storage conditions, accurate indications of the place of origin, and, where applicable, the packaging plant number. These elements are legal requirements and crucial tools in safeguarding consumer trust, product authenticity, and transparency in the food supply chain. Extra-virgin and virgin olive oils, as high-value food commodities, require particular attention to ensure that their labeling does not mislead the consumer — through unclear category descriptions, misleading origin claims, or improper use of voluntary terms. Compliance with labeling standards helps avoid unfair competition and fosters a fair internal market. Moreover, optional labeling elements such as organoleptic descriptors, acidity levels, and the year of harvest, although not compulsory, must adhere to strict conditions when used. Their application can enhance product credibility and marketability but must not circumvent fair information practice principles. Despite the absence of domestic olive oil production in countries like Slovakia or the Czech Republic, adherence to EU labeling legislation remains essential, especially in the context of imported oils. Controls conducted on national markets confirm the persistent labeling deficiencies, underscoring the need for rigorous enforcement and consistent interpretation of legal standards. Proper labeling supports informed consumer choices and ensures a level playing field for food business operators. In conclusion, the legal framework governing the labeling of extra-virgin and virgin table olive oils is detailed and prescriptive. Correctly applying these rules is essential for legal compliance, consumer protection, and maintaining the quality and reputation of olive oils in the European market. Continued attention to this issue is warranted, particularly in light of evolving marketing practices, growing consumer expectations, and the increasing relevance of origin-based labeling in the agri-food sector.

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