

Some Observations on the Legal Status of the Product “Strandzhanski Manov Med”

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Abstract: *This paper presents a study, observations, and an analysis of the current legal status of the product Strandzhanski manov med within the framework of the European Union system of geographical indications. Particular attention is paid to the legal protection linking the product to the Strandzha geographical region and to its specific natural and traditional production factors, as a key mechanism for both protecting the economic value of traditional products and indirectly preserving the knowledge and practices associated with them.*

In this context, the paper examines whether this legal framework functions solely as an instrument of protection or whether it also participates in processes of transforming tradition through its standardisation, institutionalisation, and integration into market mechanisms.

Keywords: *geographical indications; Protected Designation of Origin (PDO); intellectual property; cultural heritage*

INTRODUCTION

The current legal status of Strandzhanski manov med [Strandzha Manov Honey]¹ is significant not only in its own right but also as a contribution to the broader scholarly discourse on the Strandzha region. The subject is inherently interdisciplinary, situated at the intersection of legal scholarship and cultural studies. From a legal perspective, it falls within the field of intellectual property, more

specifically industrial property (Draganov, 2016, p. 230). At the same time, the distinctive nature of designations linked to geographical origin, together with their connection to traditional production practices, knowledge, and skills, makes them highly relevant to cultural and anthropological research concerned with the cultural practices, traditions, and heritage of the region.

Historically, the association between the distinctive qualities of a product and its geographical place of origin gave rise to the concept of geographical indications, primarily for commercial purposes (Blakeney, 2024). The reputation enjoyed by products such as Burgundy wine and similar goods created the need to protect the competitive advantage derived from their local reputation and quality. Merchants therefore began marking goods with signs indicating their place of origin, using images of local animals, characteristic

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¹ Strandzhanski manov med / Manov med ot Strandzha

buildings, heraldic symbols, and well-known local figures. Such indications of origin may be regarded as an early form of trademark, serving as a guarantee of the product's quality. As international trade expanded during the 18th and 19th centuries, it became increasingly evident that products originating from certain regions were preferred over comparable products from elsewhere because of their superior quality. That quality resulted from favourable geographical conditions, including climate and geology, as well as from traditional recipes, locally specific production techniques, and specialised regional craftsmanship (Blakeney, 2024). With the development of industrialisation, the need emerged not only to indicate the geographical origin of products but also to protect producers' commercial reputation, thereby contributing to the establishment of trademark registration systems. However, the evolution of the trademark system did not lead to the disappearance of geographical indications. In Europe, in particular, the identity and recognition of many products have remained inseparably linked to their geographical origin (Blakeney, 2024).

According to Blakeney (2024), the reputation of appellations of origin depends on the image they create in the minds of consumers. That image, in turn, is determined primarily by the product's specific characteristics and, more broadly, by its quality. Ultimately, it is this quality upon which the product's reputation is founded. For consumers, the relationship between producers' reputation and product quality also depends on their confidence that products marketed under a particular appellation of origin are authentic. Consequently, legislation governing geographical indications constitutes an instrument of the common agricultural policy, intended primarily to ensure that a geographical indication registered under the applicable legal framework possesses, by virtue of its origin in a specific geographical area, particular characteristics and thereby provides a guarantee of quality attributable to that geographical origin.

The development of private trademark systems has therefore not resulted in the disappearance of geographical indications. Par-

ticularly in Europe, substantial markets for processed food products and alcoholic beverages continue to depend upon the continued recognition of geographical indications (Blakeney, 2024).

TERMINOLOGICAL AND THEORETICAL REMARKS

Numerous scholars of the law of geographical indications (GIs) have noted the considerable diversity of the terminology associated with this field (Blakeney, 2024). According to some authors, this terminological diversity may be attributed to the various international agreements that have sought to regulate geographical indications².

In a survey of national legislation, the Secretariat of the World Trade Organization (WTO) identified twenty-three different terms and consequently adopted the expression "indications of geographical origin" as a generic concept encompassing the various forms of designation used by WTO Members to protect the geographical origin of products (Blakeney, 2024). Gangjee (2012) argues that this terminological diversity reflects the multiple policy objectives that geographical indi-

² For example, Blakeney (2024) notes that Article 10 of the Paris Convention for the Protection of Industrial Property (1883) provided for the seizure of imported goods bearing *false indications of the source of the goods*. This terminology was subsequently reproduced in the Madrid Agreement for the Repression of False or Deceptive Indications of Source on Goods (1891). The International Convention on the Use of Appellations of Origin and Denominations of Cheeses (the Stresa Convention) (1951) adopted the term *appellations d'origine* from French legislation. The same concept was later incorporated into the Lisbon Agreement for the Protection of Appellations of Origin and their International Registration (1958). Article 2 of the Lisbon Agreement defines an *appellation of origin* as:

"the geographical denomination of a country, region, or locality, which serves to designate a product originating therein, the quality or characteristics of which are due exclusively or essentially to the geographical environment, including natural and human factors."

Article 22 of the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS Agreement) defines *geographical indications* as:

"indications which identify a good as originating in the territory of a Member, or a region or locality in that territory, where a given quality, reputation or other characteristic of the good is essentially attributable to its geographical origin."

cations are intended to serve, including agricultural marketing, rural development, the preservation of traditional knowledge, and the safeguarding of cultural heritage.

Gangjee (2012) identifies several principal objectives of the legal protection of geographical indications. These include, first, the protection of consumers against deception; second, the protection of producers of GI products; third, the promotion of territorial, local, regional, and rural development; and fourth, the conservation of biological resources, biodiversity, and cultural diversity.

According to Hughes (2006), the European enthusiasm for the protection of geographical indications reflects contemporary agricultural policy to a greater extent than a desire to preserve historical institutions or traditions.

What can be observed in this regard today? Products regarded as embodying European cultural heritage, local traditions, quality, and authenticity (Geographical Indications in the EU, 2025) are protected through the Geographical Indications (GI) quality scheme, which safeguards their names by virtue of their unique link with a specific geographical area.

Until 2024, the legal protection of products associated with a particular region, quality, or tradition was governed through sector-specific regulations. Agricultural products and foodstuffs, for example, were regulated by Regulation (EU) No 1151/2012 (now incorporated into the new framework), wines by Regulation (EU) No 1308/2013, and spirit drinks by Regulation (EU) 2019/787. The legal framework could therefore be characterised as sectorally fragmented. By contrast, Regulation (EU) 2024/1143 of 11 April 2024 on geographical indications for wine, spirit drinks and agricultural products, as well as traditional specialities guaranteed and optional quality terms for agricultural products, amending Regulations (EU) No 1308/2013, (EU) 2019/787 and (EU) 2019/1753, and repealing Regulation (EU) No 1151/2012, seeks to establish a more unified and horizontal regulatory framework.

As noted above, geographical indications are closely connected with the broader system

of intellectual property. EU law – particularly Directive (EU) 2015/2436 and Regulation (EU) 2017/1001 – generally accords priority to protected geographical indications over later trademarks where there is a risk of misleading consumers or of the unlawful appropriation of the reputation associated with a protected geographical name. In addition, Directive 2005/29/EC on unfair commercial practices complements this regime by prohibiting misleading commercial practices and protecting consumers against so-called “pseudo-local” products.

In addition to promoting greater regulatory coherence, Regulation (EU) 2024/1143 introduces several important developments, including enhanced digital protection extending to online platforms, a strengthened role for producer groups and the collective management of geographical indications, as well as the incorporation of sustainability considerations through environmental practices and social standards. The latter is particularly significant in the context of intangible cultural heritage, understood as a living and continuously evolving body of traditional practices.

From this perspective, geographical indications may be understood as protecting not merely the product and its name, but also, indirectly, the knowledge, skills, traditions, and local communities associated with it at the intersection of cultural policy, intellectual property, and regional development. They therefore function as a legal mechanism through which elements of intangible cultural heritage are translated into economically valuable and legally protectable assets. At the same time, geographical indications operate both as instruments for the valorisation of heritage and as mechanisms of standardisation, potentially “fixing” tradition in legally defined forms and creating a risk of excluding alternative local knowledge and practices.

ANALYSIS

Strandzhanski manov med is protected in the European Union as a Protected Designation of Origin (PDO), which provides the highest level of legal protection by linking the product entirely to the geographical area of

Strandzha and to the specific natural and traditional factors of production³. The registration was carried out pursuant to Regulation (EU) No 1151/2012, as is evident from the registration act itself. This Regulation established the classical legal framework for the protection of geographical indications through a product specification, control, and protection against imitation.

The registration of Strandzhanski manov med in the European Union as a Protected Designation of Origin (PDO) is officially evidenced by Commission Implementing Regulation (EU) 2019/537, by which the name was entered in the Register of Protected Designations of Origin and Protected Geographical Indications⁴. In accordance with the Single Document accompanying the application for registration, it is expressly stated that the product falls within the category of Protected Designation of Origin (PDO) rather than Protected Geographical Indication (PGI). This distinction concerns the level of legal protection afforded to the product and will be discussed separately below.

As noted above, the registration was carried out pursuant to Regulation (EU) No 1151/2012 on quality schemes for agricultural products and foodstuffs, which lays down the conditions and procedure for the registration of geographical indications, including the requirement to submit a product specification defining the characteristics of the product, the geographical area, and the link between them. Within this legal framework, the registration of a name as a Protected Designation of Origin (PDO) gives rise to legal protection throughout the territory of the European Union.

This status means that all stages of the production, processing, and preparation of

the product take place within the designated geographical area and that its quality or characteristics are essentially or exclusively attributable to the specific geographical environment, including both natural and human factors. It is precisely this close and comprehensive link between the product and the geographical area that distinguishes a Protected Designation of Origin (PDO) from the other categories of geographical indications and justifies the higher level of protection.

Since its registration in 2019, Strandzhanski manov med has enjoyed the full legal protection provided under EU law for Protected Designations of Origin, including protection against the unlawful use of the name, imitation, and any practices that may mislead consumers as to the origin of the product.

Although the legal framework governing geographical indications was subsequently revised through the adoption of Regulation (EU) 2024/1143, this does not alter the status of the product but rather integrates it into the new, more unified system for the protection of geographical indications in the European Union. In other words, the adoption of Regulation (EU) 2024/1143 introduces an updated legal framework which does not change the status of the product but expands the possibilities for its protection and management through enhanced digital protection, a greater role for producers, and the integration of sustainable practices.

PRODUCT SPECIFICATION OF STRANDZHANSKI MANOV MED AS A PROTECTED DESIGNATION OF ORIGIN (PDO)

The Single Document accompanying the application for the registration of Strandzhan-

³ Other documents:

Ministry of Agriculture and Food: <https://www.mzh.government.bg/bg/politiki-i-programi/politiki-i-strategii/politiki-po-agrohranitelnata-veriga/zashiteni-naimenovaniya/znp-strandzhanski-manov-medmanov-med-ot-strandzha/> (02.06.2026).

The European Commission approves a new Bulgarian protected designation of origin <https://cap18.europe.bg/en/node/253> (27.03.2026).

Single document: https://www.mzh.government.bg/media/filer_public/2018/12/21/edinen_dokument_strandzhanski_manov_med.pdf (02.06.2026)

⁴ Act of registration: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32019R0537> (02.06.2026).

⁵ [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32018D1213\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32018D1213(01)) (27.03.2026).

ski manov med as a Protected Designation of Origin (PDO)⁵ constitutes a key legal instrument through which a traditional practice is translated into the language of law. Published in the Official Journal of the European Union as part of the registration procedure, it contains a concise presentation of the essential elements of the product specification on the basis of which the registration was granted (see Single Document – “Strandzhanski manov med”, OJ C 418, 23 November 2018, CELEX: 52018XC1123(02)).

Within this document, the product is defined through a set of objectively verifiable characteristics, including physicochemical parameters, organoleptic properties, and specific features of the raw material that distinguish it from other types of honey. Its dark colour, high mineral content, and characteristic aromatic profile are described not merely as empirical observations but as legally relevant criteria subject to verification and official control. In this way, traditionally recognised qualities are transformed into standardised indicators capable of being certified within an administrative procedure.

A further essential element of the Single Document is the definition of the geographical area, encompassing the territory of Strandzha, together with the description of the link between the product and its environment. This link is substantiated through a combination of natural factors – specific climatic conditions and vegetation favourable to the production of honeydew honey – and human factors associated with traditional beekeeping practices transmitted across generations. It is precisely this combination of the natural environment and accumulated traditional knowledge that justifies the product’s qualification as a Protected Designation of Origin (PDO) and legally substantiates its uniqueness.

An analysis of the Single Document demonstrates how the law “describes” tradition through a process of selection, formalisation, and standardisation. Living and inherently variable practices are translated into stable criteria capable of institutional application and control. In this sense, the document not only reflects an existing tradition but also par-

ticipates in shaping it by determining which of its elements are considered legally relevant and how they are to be reproduced in the future.

FINDINGS

The legal status of Strandzhanski manov med illustrates the transformation of a traditional local practice into a legally protected economic resource while simultaneously raising the question of the limits of legal protection in relation to intangible cultural heritage.

At the same time, an important research question arises as to whether there is an inherent tension between the law’s protection of a standardised version of tradition and the continuing vitality of that tradition as expressed through diverse and informal production techniques.

Several scholars have also drawn attention to the limitations of systems of geographical indications (GIs) and Protected Designations of Origin (PDOs). According to Tregear (2007), their function as indicators of quality and authenticity is not always perceived unambiguously by consumers. In some cases, a product’s high level of recognition and established reputation may render such legal designation almost redundant, whereas in others these schemes may impose a standardised and institutionalised representation of local product identity. They have also been criticised for “fixing” resources, practices, and understandings of authenticity within a particular historical and cultural framework, thereby potentially constraining innovation and alternative development trajectories. Against this background, Tregear raises the question of the extent to which GI systems create opportunities for entrepreneurs and producers developing new products outside established territorial and cultural models, including in regions characterised by a high degree of typicity and strongly established local product identities (Tregear, 2007).

The positive effects of these schemes are undeniable, including increased economic value, market recognition, and protection against imitation. Nevertheless, concerns re-

main regarding the “fixation” of tradition, the exclusion of peripheral producers, and the bureaucratisation of traditional practices. These considerations also invite a comparison between the legal frameworks governing such practices – which, in essence, constitute forms of intangible cultural heritage – namely the European Union legal framework on geographical indications (GIs) and the 2003 UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage.

The fundamental difference between the two regimes lies in their respective objects of protection. EU law protects the product and its name, following a market-oriented logic and relying upon a standardised product specification designed to secure legal protection and economic value. By contrast, the UNESCO Convention (2003) for the Safeguarding of the Intangible Cultural Heritage protects practices, knowledge, and skills as elements of the intangible cultural heritage of communities, with the aim of preserving their vitality and ensuring that traditional practices remain dynamic and living. Conceptually, therefore, the EU legal framework codifies and stabilises tradition, whereas the UNESCO approach seeks to sustain its continuity, adaptability, and vitality as a living cultural practice. Their common ground lies in recognising the intrinsic relationship between community and practice, acknowledging local specificity, and creating mechanisms of legitimacy. It may therefore be argued that the system of geographical indications (GIs) codifies and partially fixes particular aspects of tradition, whereas the 2003 UNESCO Convention approaches tradition as a living cultural value.

It may thus be concluded that geographical indications (GIs) within EU law function as a hybrid mechanism that simultaneously protects the economic value of traditional products and indirectly safeguards the knowledge and traditional practices associated with them. In this process, however, intangible cultural heritage is transformed into a standardised and legally fixed form, raising important questions concerning the boundary between safeguarding and the regulatory

limitation of its vitality.

The literature further emphasises that the economic and social effects of Protected Designations of Origin (PDOs) and Protected Geographical Indications (PGIs) do not arise automatically from registration itself. According to Marescotti (2003), the recognition of a product as a PDO or PGI may create favourable conditions for rural development and the retention of local added value, but the actual distribution of benefits depends largely upon the organisational capacity of local producers, the governance strategies adopted for managing the designation, and the ability of local stakeholders to retain control over supply chains. In this sense, geographical indications (GIs) not only protect existing traditions and practices but also participate in restructuring the relationships between local communities, markets, and institutions, creating both opportunities for development and new forms of dependency and uneven distribution of benefits (Marescotti, 2003).

The role that a typical regional product may play within a broader territorial development strategy is well illustrated by Marescotti's example of the cherries of Lari (Italy). In this case, a product of relatively limited economic importance to the local economy became recognised by the local community as a “cultural marker” and was used as a means of attracting consumers to a broader basket of goods and services offered within the region. The reputation of the Lari cherries thus functioned as a catalyst for the development of other local activities. The application for PDO recognition itself stemmed, in part, from the intention of the local public administration and tourism association to capitalise on the symbolic value of the product in promoting the entire territory, including its castle, agriculture, agritourism, festivals, and other cultural attractions. The principal value of the product therefore resided in its role as a cultural marker reinforcing local identity and social cohesion while simultaneously promoting the wider region (Marescotti, 2003, p. 13). At the same time, however, Marescotti demonstrates that PDO/PGI recognition may also have restrictive consequences for primary

producers. The mandatory requirements contained in the product specification may limit the diversity and variability that might otherwise characterise local production.

The use of a geographical indication (GI) may also be understood as a form of symbolic capital contributing to the construction of narratives, traditions, and local identity (Dimitrov, 2017, p. 179). Similarly, Vukov (2017, p. 207) identifies a close relationship between geographical indications (GIs) and the rediscovery of tradition in the context of transformations in agriculture.

From this perspective, the process of legal protection through geographical indications (GIs) may be viewed not only as a mechanism for safeguarding local knowledge and traditional practices but also as a process of institutionalisation, in which the questions of who defines the content of “tradition” and who ultimately benefits from it become matters of central importance (Marescotti, 2003).

For this reason, research conducted from a cultural-anthropological perspective is particularly well suited to revealing this dimension of the instrumentalisation of heritage and its use as an economic resource (Petrova, 2017, p. 243).

DISTINGUISHING BETWEEN THE DIFFERENT LEGAL CATEGORIES OF GEOGRAPHICAL INDICATIONS

The relationship between geographical indications (GIs) and Protected Designations of Origin (PDOs) is both hierarchical and functional. The former constitutes the general legal category, while the latter represents its most stringent subcategory.

Within the legal framework governing geographical indications (GIs), several categories exist, one of which is the Protected Designation of Origin (PDO). A PDO is granted to a product that satisfies three cumulative requirements: origin (the product originates from a specific geographical area), quality (its qualities or characteristics are essentially or exclusively attributable to that geographical environment), and complete localisation of production (all stages of production take place within the defined geographical area).

Accordingly, a PDO represents the strictest form of legal protection within the broader category of geographical indications (GIs), requiring an exceptionally close connection between the product and its geographical area.

A Protected Geographical Indication (PGI) constitutes a more flexible category. Its defining characteristics are that the product is associated with a particular geographical region and possesses a specific reputation, quality, or other characteristic attributable to that origin, while only one stage of production, processing, or preparation is required to take place within the designated geographical area. Consequently, the territorial link is less stringent than that required for a PDO.

By contrast, a Traditional Speciality Guaranteed (TSG) does not require any geographical connection. The product must be traditional in character and produced using a specific traditional method. In this case, legal protection is granted to the traditional recipe or method of production rather than to the place of origin or geographical area.

Accordingly, within EU law, geographical indications (GIs) constitute the overarching legal framework encompassing several categories that differ in the degree of connection required between the product and its geographical origin.

LEGAL ANALYSIS OF STRANDZHANSKI MANOV MED

As noted above, the adoption of Regulation (EU) 2024/1143 does not alter the legal status of Strandzhanski manov med but rather integrates it into the new legal framework. This has several important legal consequences.

First, the product's registration as a Protected Designation of Origin (PDO), effected through Commission Implementing Regulation (EU) 2019/537 pursuant to Regulation (EU) No 1151/2012, remains fully valid without interruption. The new Regulation neither requires re-registration nor provides for a review of previously recognised designations as a condition for maintaining their legal validity. This follows both from the general principle of legal continuity in EU law and from the explicit transitional provisions of the new

Regulation, which ensure the continued protection of all previously registered geographical indications (GIs)⁶.

The conclusion that existing geographical indications (GIs) remain valid and are incorporated into the new system without the need for re-registration follows directly from Article 93 of Regulation (EU) 2024/1143, which provides for the automatic entry of previously registered names into the new Union Register of Geographical Indications⁷.

Second, this process of “integration” means that previously registered designations automatically fall within the scope of the new, broader, and more unified legal framework. In other words, the product’s status as a Protected Designation of Origin (PDO) remains unchanged, whereas the rules governing its protection, management, and enforcement are now contained in the new Regulation. These include, for example, the new provisions concerning online protection, the strengthened role of producer groups, and the possibility of incorporating sustainability practices into product specifications.

Third, integration also entails a form of functional enhancement. The product does not receive a new type of legal protection but benefits from an expanded set of legal and administrative instruments for its protection and management, while its defining characteristics as a Protected Designation of Origin (PDO), namely its close territorial link and the requirement that all stages of production oc-

cur within the designated geographical area remain unchanged.

DIFFERENCES BETWEEN THE NEW AND THE PREVIOUS LEGAL FRAMEWORK

Although the adoption of Regulation (EU) 2024/1143 constitutes a substantial reform of the legal framework governing geographical indications (GIs) in the European Union, it does not alter the legal status of products that had already been registered, including Strandzhanski manov med, which remains registered as a Protected Designation of Origin (PDO).

Instead, the new Regulation functions as an instrument of systemic integration and modernisation through which existing rights are effectively translated into a more unified, horizontally structured, and functionally expanded regulatory framework. This transformation does not affect the substance of the right itself – that is, the legally protected relationship between the product, the geographical area, and its specific qualities that characterises a Protected Designation of Origin (PDO) – but rather the manner in which that right is administered, implemented, and enforced.

From this perspective, the reform may be understood as a transition from a relatively fragmented, sector-specific regulatory approach to a more coherent legal model. The new framework strengthens legal protec-

⁶ An application is required only for geographical indications that fall within the scope of the new Regulation but were not covered by the previous legal framework, although they enjoyed protection under national law. Article 92 of Regulation (EU) 2024/1143 provides that the national protection granted to geographical indications which did not fall within the scope of Regulation (EU) No 1151/2012, but do fall within the scope of the new Regulation, shall expire on 14 May 2025, unless an application for registration has been submitted to the Commission by that date. After that date, such geographical indications may still be registered under the new Regulation; however, registration will take effect without preserving the national protection previously granted.

⁷Article 93

Continuity of the registers

1. Each designation of origin and geographical indication of wine and agricultural products, and each geographical indication of spirit drinks, including all relevant data and data concerning pending applications for registration, amendment or cancellation, entered in the respective registers of geographical indications referred to in Article 11 of Regulation (EU) No 1151/2012, Article 104 of Regulation (EU) No 1308/2013 and Article 33 of Regulation (EU) 2019/787, on 12 May 2024 shall be entered automatically in the Union register of geographical indications.

2. Each traditional speciality guaranteed entered in the register of traditional specialities guaranteed referred to in Article 22 of Regulation (EU) No 1151/2012, including all relevant data and data concerning pending applications for registration, amendment or cancellation, on 12 May 2024, shall be entered automatically in the Union register of traditional specialities guaranteed. <https://eur-lex.europa.eu/eli/reg/2024/1143/oj> (11.05.2026).

tion, including in the digital environment, institutionalises the role of producer groups as representatives of collective interests, and introduces the possibility of incorporating sustainability practices directly into product specifications. Consequently, the legal framework governing geographical indications (GIs) evolves from an instrument primarily concerned with certifying origin and quality into a broader mechanism for managing the economic, social, and cultural value of traditional products, while preserving the legal continuity of existing rights.

The principal difference between the previous regime established by Regulation (EU) No 1151/2012 and the new framework introduced by Regulation (EU) 2024/1143 may therefore be understood as structural in nature: a transition from a fragmented to a unified regulatory system. Whereas the previous regime regulated different product sectors through separate legislative instruments, the new Regulation consolidates these regimes within a coherent legal framework by establishing common rules applicable across different categories of products. In this respect, Regulation (EU) 2024/1143 expressly pursues the objectives of harmonisation, simplification, and a broader systemic approach. It also forms part of a wider reform of the EU system of geographical indications (GIs), which includes a separate legal framework for craft and industrial products.

The new Regulation also significantly strengthens legal protection, particularly in the digital environment, while enhancing the role of producer groups. One of its most important innovations is the explicit extension of protection to online platforms, internet domain names, and electronic commerce. It imposes obligations on Member States and relevant stakeholders to combat the misuse of geographical indications (GIs) in the digital environment.

Whereas under the previous legal framework producer groups performed primarily functional tasks, the new Regulation expressly recognises them as key actors and grants them broader powers, including responsibilities relating to the management of registered

names, participation in control mechanisms, and the initiation of enforcement actions against infringements. It also permits the inclusion of voluntary sustainability commitments in product specifications or in accompanying documents prepared by producer groups. These elements did not constitute a central component of the regime established under Regulation (EU) No 1151/2012. From this perspective, the new legal framework may be viewed as reflecting broader global concepts of sustainable agriculture and sustainable development and their implementation at the local level (Stancheva, 2017, 247). It also seeks to accelerate registration procedures and to establish a clearer allocation of competences between Member States and the European Commission as part of the broader reform aimed at simplification and efficiency.

It may therefore be concluded that the essential difference between the two legal frameworks lies not in the substance of the protection itself but in the governance of the system, the expanded scope of protection – particularly in the digital environment – the enhanced role of producer groups, and the introduction of new policy objectives, including sustainability and administrative efficiency. Importantly, the new Regulation does not alter the legal status of previously registered products but rather modernises and expands the legal framework within which that status operates.

Within EU law, geographical indications (GIs) do not create an exclusive right in favour of the applicant but establish a collective system of use under which the right to use the protected name is not confined to those who submitted the registration application. Under both Regulation (EU) No 1151/2012 and Regulation (EU) 2024/1143, the right to use a registered designation belongs to all producers operating within the defined geographical area who produce the relevant product in accordance with the approved product specification. Under Regulation (EU) No 1151/2012, this principle follows from a systematic interpretation of the provisions governing the definition of Protected Designations of Origin (PDOs) and Protected Geographical Indications (PGIs), the content of the product speci-

fication (Articles 5 and 7), and the protection afforded to registered names (Article 13).

The new Regulation expressly confirms this approach through provisions establishing that every operator whose production complies with the relevant product specification is entitled to use the registered geographical indication (GI)⁸. Consequently, the applicant (typically a producer group) does not acquire an exclusive right to the registered name but merely initiates the registration procedure.

Accordingly, under both legal frameworks, geographical indications (GIs) function as a form of collective right based on open access, where entitlement to use the protected name depends not upon membership of a particular organisation or legal entity but upon objective compliance with the legally prescribed requirements (Regulation (EU) No 1151/2012, Articles 5, 7, 13 and 49; Regulation (EU) 2024/1143).

CONCLUSION

Viewed within the broader legal context of intellectual property and geographical indications, Hughes' distinction (Hughes, 2006, 303) between the fundamental functions of geographical terms used in product names remains valid. According to Hughes, such terms serve several core purposes: indicating geographical origin, signalling particular qualities, and creating emotional and aesthetic value.

Accordingly, Hughes argues that, since 2004, the European Union has sought to "re-claim" more than forty geographical terms that have become generic names for food products in other jurisdictions (such as Parmesan cheese and Champagne). In the author's view, however, the underlying objective is straightforward: to secure control over geographical terms because of their emotional

value in the marketplace. The monopoly over such terms, together with the exclusive control over their emotional value, has shaped the European Union's position in debates and policymaking concerning geographical indications (Hughes, 2006, p. 305).

The current legal status of Strandzhanski manov med is therefore significant not only in its own right but also as a gateway to a broader range of research questions concerning the Strandzha region. The subject is inherently interdisciplinary, situated at the intersection of legal scholarship and cultural studies. Research on products protected by geographical indications demonstrates that such products function as markers of identity, playing an important role in various legitimising narratives within the broader processes of the "culturalization of products and the economisation of culture" (Petrov, 2017, p. 158).

From a legal perspective, the issue falls within the field of intellectual property – and more specifically industrial property – as it concerns the legal framework governing geographical indications. Accordingly, this paper has examined the applicable legal framework together with the innovations introduced by European Union secondary legislation, in particular Regulation (EU) 2024/1143, which establishes a directly applicable and binding legal framework in this field.

At the same time, the analysis has highlighted that geographical indications function not merely as legal instruments for the protection of economic interests but also as mechanisms that mediate and structure the relationship between product, territory, and tradition. It is precisely this dual function – law acting simultaneously as a protective and transformative mediator between economy and culture, that justifies the incorporation of cultural and anthropological perspectives

⁸ Article 36 of Regulation (EU) 2024/1143 expressly confirms the collective nature of the system of geographical indications. It provides that a registered geographical indication may be used by any natural or legal person marketing a product that complies with the relevant product specification. Member States are required to ensure that operators are subject to verification of compliance with the product specification in accordance with Article 39 of the Regulation or, where applicable, Article 116a of Regulation (EU) No 1308/2013. Furthermore, where a geographical indication consists of, or contains, the name of the applicant producer's holding, this does not prevent other operators from using the registered geographical indication, provided that it is used in relation to a product complying with the product specification.

into the analysis of the associated practices, knowledge, and forms of intangible cultural heritage.

Equally important is the relationship between place, cultural tradition, and product identity, since consumers frequently perceive regional products not merely as commodities but also as carriers of local history, authenticity, and cultural belonging. This symbolic and cultural dimension contributes significantly to the value created by the system of Protected Designations of Origin (PDOs) and Geographical Indications (GIs) (Tregear, 2007).

From this perspective, geographical indications may be understood not only as mechanisms for the legal protection of origin but also as instruments for institutionalising and legitimising particular conceptions of local identity, tradition⁹, and authenticity, through which cultural heritage is translated into an economic resource and an object of legal protection (Tregear, 2007).

This, in turn, raises important questions concerning the limits of legal intervention in the safeguarding of intangible cultural heritage and the role of law not merely as an instrument of protection but also as an active participant in shaping and constructing that heritage. These questions are likely to become increasingly important within future interdisciplinary research.

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⁹ For the purposes of Title III, Chapter 2 of Regulation (EU) 2024/1143, Article 2(3) defines "traditional" as proven historical use of the name by producers within a community for a period that allows transmission between generations. Such period must be at least 30 years, and the demonstrated use may include modifications necessitated by changes in hygiene practices, food safety requirements, and other relevant practices.

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Някои наблюдения около правното положение на продукта „Странджански манов мед“

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Резюме: Настоящата статия представя изследване, наблюдения и анализ на настоящия правен статут на продукта „Странджански манов мед“ в рамките на системата на Европейския съюз за географските указания. Особено внимание се обръща на правната защита, свързваща продукта с географския регион Странджа и с неговите специфични природни и традиционни производствени фактори, като ключов механизъм както за защита на икономическата стойност на традиционните продукти, така и за косвено съхраняване на знанията и практиките, свързани с тях. В този контекст в статията се разглежда дали тази правна рамка функционира единствено като инструмент за защита или дали тя участва и в процесите на трансформация на традицията чрез нейната стандартизация, институционализация и интеграция в пазарните механизми.

Ключови думи: географски указания; защитено наименование за произход (ЗНП); интелектуална собственост; културно наследство
