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An Analysis of Geographical Indications in terms of International, Bilateral and Regional Agreements[1]

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Abstract

A geographical indication (GI) serves as a quality label that identifies and assures a product's origin for consumers, highlighting its unique features and the link between these characteristics and its geographical source. Registering a GI provides protection for products that have earned a reputation based on their quality, tradition, regionally sourced raw materials, and local attributes. GIs play a dual role: they not only help transmit local culture to future generations and promote economic development within a country, but they also encompass products with substantial profit potential in international trade. Items such as cheeses, processed animal products, and naturally grown goods (e.g., hazelnuts, grapes, figs) are commonly traded internationally under GI protections. This study aims to analyze international, bilateral, and regional agreements related to GIs, specifically those covering appellations of origin. The analysis includes the 1883 Paris Convention, the 1891 Madrid Convention, the 1958 Lisbon Agreement, and more recent agreements on trade-related intellectual property rights under the World Trade Organization (WTO), as well as bilateral and regional agreements on GIs among countries. Although these agreements address international disputes and trade matters concerning GI products, findings indicate that they can also lead to various challenges between countries regarding the protection and trade of these products.

Keywords: Agricultural Trade, Geographical Indication, TRIPS, International Trade Agreements, WTO, Intellectual Property
JEL Classification: F13, F15, O34, Q17

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Coğrafi İşaretli Ürünlerin Uluslararası, İki Taraflı ve Bölgesel Anlaşmalar Açısından İncelenmesi

Öz

Coğrafi işaret, tüketiciler için ürünün kaynağını, karakteristik özelliklerini ve ürünün söz konusu karakteristik özellikleri ile coğrafi alan arasındaki bağlantıyı gösteren ve garanti eden kalite işaretidir. Coğrafi işaret tescilinin alınması, kalitesi, gelenekselliği, yöreden elde edilen hammaddesi ile yerel niteliklere bağlı olarak belli bir üne kavuşmuş ürünlerin korunmasını sağlamaktadır. Coğrafi işaretler, sadece ülke içinde yerel kültürü gelecek nesillere aktarma ve ekonomik kalkınma aracı değil aynı zamanda uluslararası ticarete de konu olabilen ve önemli bir kazanç sağlama imkânı sağlayan ürünlerden de oluşabilir. Özellikle peynir türleri, işlenmiş hayvansal ürünler, doğal yetişen ürünler (fındık, üzüm, incir vb. gibi) uluslararası ticarete konu olabilmektedir. Bu çalışmanın amacı uluslararası, iki taraflı ve bölgesel anlaşmaların menşe adı ve mahreç işaretli ürünleri kapsayan coğrafi işaretler açısından incelenmesidir. Bu kapsamda 1883 Paris Sözleşmesi, 1891 Madrid Sözleşmesi, 1958 Lizbon Anlaşması ve nihai olarak en güncel anlaşma olan WTO'nun ticaretle bağlantılı fikrî mülkiyet haklarını konu alan anlaşmalar ve ülkeler arasında coğrafi işareti de konu alan ikili ve bölgesel anlaşmalar değerlendirilmiştir. Bu anlaşmalar coğrafi işaretli ürünlerle ilgili uluslararası uyuşmazlıklar ve ticaret sorunlarına çözüm sunsa da ülkeler arasında bu ürünlerle ilgili çeşitli sorunlara yol açabileceği sonucuna varılmıştır.

Anahtar Kelimeler: Tarımsal Ticaret, Coğrafi işaret, TRIPS, Uluslararası Ticari Anlaşmalar, DTÖ, Fikri Mülkiyet

JEL Sınıflandırması: F13, F15, O34, Q17

Introduction

The history and initial use of geographical indications (GIs) can be traced back to Ancient Greece and Ancient Egypt (Tekelioğlu, 2016). Since products with geographical indication (GI) characteristics provide undeniable benefits to their owners and producers, they have historically needed to be protected at the local or national level. France's development of a legal and practical protection system for its wines was the first time that GIs were conceptually considered in Europe. Furthermore, this initiative by France prompted other countries in the region to establish and develop their own national (ministerial level) policies for protecting their wines. As these policies diversified and other types of products were added, countries were forced to enter into international, bilateral, or regional agreements to protect their interests in these products, or to add these products to their existing agreements (Demirarslan, 2022).

Since other products of this type in Europe are also directly related to trade and can also be associated with intellectual property, the European Union (EU) came up with

the idea of including these types of products in international protection. The European Union submitted a proposal to the World Trade Organization (WTO) on the necessity of including these products with GI characteristics in the Trade-Related Intellectual Property Agreement (TRIPS), which was adopted in the Uruguay Round between 1986 and 1994, and this proposal was accepted, ensuring that GI products are now evaluated and protected like intellectual and industrial rights.

An examination of the Paris Convention of 1883, the Madrid Convention of 1891 and the Lisbon Convention of 1958, all of which were in force long before the products with a GI became a subject of TRIPS and received explicit international protection, reveals the processes that the GI has gone through as international agreements. In addition to these international agreements, articles on the protection and trade promotion of such products have also been included in bilateral agreements or regional agreements. In such agreements, intellectual and industrial property rights clauses are regulated in general and inclusive terms without mentioning specific products of certain countries. The remainder of the work proceeds as follows: In the first section, general research on products with GIs is discussed, followed by an explanation of recent studies addressing the international dimension of GIs, including bilateral and regional agreements. In the second section, geographical indications are examined in the context of multilateral treaties, considering the historical process and examining both the strengths and weaknesses of these agreements in relation to the protection of geographical indications. Third, GIs will be analyzed in terms of regional and bilateral agreements. Finally, a general evaluation is presented in the conclusion section.

1. Literature Review

There is a substantial number of scientific studies in the literature that address concepts related to international trade. However, the number of studies related to the concept of GIs is quite limited. Research on GIs generally focuses on areas such as the role of GIs in gastronomy and regional tourism, GIs as a tool for sustainable regional and rural development, GIs from a marketing perspective, legal regulations concerning GIs, and product-based evaluations. Furthermore, there are relatively few studies examining the relationship between GIs and international trade.

Studies examining gastronomy and regional tourism can be illustrated through the effects of GI foods and beverages on gastronomic tourism (Coşkun et al., 2024), the analysis of regional products in the context of gastronomic tourism (Esen, 2022; Cam and Çılgınoğlu, 2024), and their contributions to regional tourism (Avşar and Eryılmaz, 2022). Examples of studies related to regional and rural development and GIs include the perception of GIs as a development tool in certain provinces (Kanberoğlu and Yıldırımçakar, 2022), the role of GIs in rural-local development (Bidav and Doğan, 2022; Crescenzi et al., 2022), and case analyses of GI products as instruments for rural development (Vecchio et al., 2020). Additionally, there are studies that address GIs as tools for sustainable development (Flinzberger et al., 2022; Uçuk and Perçin, 2022).

Studies focused on the marketing of GI products revolve around topics such as GIs and consumer behavior (Berber et al., 2024), pricing policies for GI products (Bimbo et al., 2023), and the use of GIs as a marketing strategy tool (Mece, 2023). Additionally, there are also studies that evaluate GI products from the perspective of supply chain management (Wong and Elbegsaikhan, 2020; Falasco et al., 2024).

From a legal perspective, studies focus on the examination of GI laws and the necessity of establishing legal protection for these indications. Recent legislative reviews include the innovations brought by the current law to Turkey (Suluk, 2018) and analyses concerning the nature of the protection required by law (Merhacı, 2023). Additionally, some studies discuss whether GIs should be protected under trademark law or whether they require a distinct sui generis[2] protection system (Gangjee, 2020; Calabrese, 2024). In addition to these fundamental topics, the literature also includes studies that examine GIs based on specific products, such as cheeses (İçli and Anıl, 2022), agricultural products (Durmuş et al., 2022), food items (Cebeci and Şen, 2020), and handicrafts (Kırıkcı and Çetiner, 2021).

Beyond the general situations highlighted above, the literature includes studies that directly address international, regional, or bilateral agreements encompassing GIs. These agreements often focus on the impact of international protection on trade margins and the potential legal issues that may arise from the legal framework and the scope of protection among countries. Bozgeyik and Macit (2024) examined the developments in EU and Turkish trademark law in their study and focused on the judicial and legal effects of the developments in trademark law of European countries on Turkish trademark law. However, this study focused on the developments in trademark law that deal with GI in a more general context, not in terms of GI products.

Lightbourne (2021) reviews the evolution of GIs and delineates key positions within the WTO framework. It examines the influence of WTO Dispute Settlement Body (DSB) rulings on the European Union's system, recent bilateral agreements between China and the EU, and between the EU and the United States. Additionally, it assesses the impact of the Geneva Act of the Lisbon Agreement on GIs and the ongoing dialogue on these issues within the Internet Corporation for Assigned Names and Numbers (ICANN).

Calabrese (2024) highlights a key gap in extending GI protection to services, with unresolved EU case law questions about regulating geographical names in service markets. This includes addressing both direct restrictions and authorized use, akin to trademark rules. The evolving GI role in services also raises competition issues, especially around resale rights and the "prestige" rationale for GI protection. It is suggested that a balanced approach to adapt the EU GI framework to future demands, while preserving its identity as a distinct intellectual property right.

[2] The concept of sui generis will be explained in the Regional Agreements and GI section of the study.

Curzi and Huysmans (2021) investigate whether GI products with external protection via bilateral and regional trade agreements see an increase in their GI exports to the EU. Using comprehensive cheese export data from 2004 to 2019, their study applies advanced trade models that account for zero-trade flows for certain goods. Their results suggest that legal GI protection within trade agreements generally does not significantly boost exports beyond the overall trade-promoting effects of the agreements themselves.

Huysmans (2022) formulates and empirically examines a theory of GIs protection using new data on GIs listed in 11 recent EU trade agreements. The findings reveal that EU trade agreements are more likely to protect GIs with higher sales values and originating from Southern European countries, where gastronationalism heightens the significance of GIs. These results demonstrate how economic, cultural, and political dynamics influence and facilitate the EU's policy extension via trade agreements.

Raimondi et al. (2020) investigate how food quality policies, specifically EU geographical indications (GIs), impact trade margins from 1996 to 2014 using a new dataset with country-product details on EU GIs. The study examines GIs' effects on intra-EU and extra-EU trade margins, as well as export and import values per unit. The findings suggest that GIs impact trade flows differently depending on their origin. GIs from the exporting country positively influence both extensive and intensive trade margins, while GIs registered only in the importing country can act as a mild trade barrier, especially on intensive margins. Additionally, GIs are shown to increase export prices, with intra-EU trade margins mirroring those of EU foreign trade.

Henckels (2022) discusses the EU's GIs regime for wines, focusing on the circumstances under which a World Trade Organization member's actions to implement the TRIPS Agreement could potentially conflict with its obligations under the Agreement on Technical Barriers to Trade (TBT Agreement). As a result of the study, the compatibility of EU regulations on wines with the TBT agreement is viewed as questionable. Hari et. all (2022) analyzes free trade agreements that incorporate provisions for the protection of GIs from Asian countries, including China, South Korea, India, Japan, Malaysia, Singapore, and Vietnam, which have been signed and fully negotiated. The study explores whether Asian countries require a regional arrangement, considering the successful models established by common EU regulations on GIs and Annex VI of the Bangui Agreement of the African Intellectual Property Organization.

Blasetti (2020) focuses on the intellectual property section of the EU-MERCOSUR Free Trade Agreement, specifically considering GIs. The study illustrates the complexities of incorporating the private rights of prior users (such as generic names, plant varieties, and trademarks) as a trade-off for agricultural market access in negotiations that primarily emphasize tariff reductions and trade regulations. Several proposals are presented to establish a medium- and long-term strategy that addresses the needs of local producers in order to enhance the value of their products.

Frankel (2017) debates on various approaches to the protection of GIs within mega-regional and bilateral Free Trade Agreements (FTAs). The study also addresses

several incompatibilities between the EU-centric and US-centric frameworks. Furthermore, it poses questions regarding countries that claim to engage in both regimes, such as Singapore, South Korea, Australia, and New Zealand. Viju et. all (2012) investigates the broader issues related to disparities in intellectual property protection and their impact on market access, as well as the specific challenges concerning the protection of GIs in the context of the Comprehensive Economic and Trade Agreement (CETA) negotiations for North American Free Trade Agreement (NAFTA) members. The paper also examines any potential conflicts between Canada's commitments under NAFTA and the prospective provisions of CETA.

Prescott et. all (2020) addresses the implications of the draft withdrawal agreement that ensures mutual protection of GIs between the United Kingdom, which has exited the European Union, and the EU. Under the withdrawal agreement, GIs from outside the EU do not receive protection. Consequently, the study questions how UK GIs will remain protected in countries that have entered into free trade agreements with the EU, by analyzing the rollover agreements that the UK government is establishing globally.

Sunner (2021) seeks to examine how the European Union has progressively integrated higher levels of protection for GIs within its trade agenda. The article provides insights for future developments in this area, as the European Union increasingly establishes itself as a dominant player in numerous similar agreements on the global stage. Cheng (2023) analyzes the challenges in China's geographical indication (GI) protection system, which includes sui generis system and a trademark-based system. Implemented after China's WTO accession, this approach has positioned China as a prominent player in global GI discussions, particularly for developing countries. However, it has also created domestic legal inconsistencies and regulatory conflicts, which may be further complicated by recent bilateral agreements with the EU and the US.

Marie-Vivien (2020) explores the growth of geographical indications (GIs) in the Association of Southeast Asian Nations (ASEAN) and Asia, focusing on the legislative frameworks and their implementation in eight ASEAN countries with sui generis GI systems, as well as in India and Japan. The study highlights common challenges and points of convergence, providing strategic recommendations to bolster GI success in Asia. It emphasizes the importance of involving collective organizations that represent various stakeholders in the value chain to enhance the development and management of effective GI strategies.

Bannakorn (2023) aims to analyze the legal framework for GIs in Thailand, comparing it to international standards and best practices. The study focuses on Thai laws, international agreements like the Paris Convention, Madrid Agreement, Lisbon Agreement, TRIPS Agreement, and EU regulations, as well as Singapore's GI Act. The study concludes that the main issues are unclear legal framework, insufficient protection, and challenges in compliance.

Mogol (2021) aims to examine the current state of GIs in the EaP countries (Georgia and Moldova), showcasing best practices while also identifying vulnerabilities

within their GI systems. Since June 18, 2018, the European Union (EU) and Australia have been negotiating an ambitious and comprehensive FTA. Kneller (2020) examines how GIs may fare in these negotiations, given the historical conflicts between Australia and the EU over agricultural policy in international trade and their opposing legal approaches to GI protection, except in the case of wines. The study addresses the legislative framework for GIs, the primary challenges facing GI discussions, and identifies key potential points of convergence.

In light of the aforementioned studies, both developed and developing countries are striving to establish a sustainable GIs protection structure. The structure is to be established through bilateral and regional agreements, in addition to global agreements. Furthermore, the impact of these agreements on trade margins between countries is being determined. Finally, scientific studies are being conducted to ascertain which agreement is better suited to protect the interests of countries in question.

This article is expected to contribute to the literature by providing a comprehensive examination of recent bilateral and regional trade agreements related to geographical indications (GIs) using the latest data. It aims to facilitate a thorough evaluation of future trade agreements before their approval.

2. Geographical Indications and Multilateral Treaties

Countries employ various strategies to safeguard their high-value-added products at the borders of other nations, with internationally recognized agreements being among the most significant measures. While bilateral or regional agreements offer a certain level of protection, nations often find that global protection is ultimately more effective. This section will explore key international agreements, including the 1883 Paris Convention, the 1891 Madrid Convention, the 1958 Lisbon Agreement, and the latest agreement, the WTO's Trade-Related Aspects of Intellectual Property Rights (TRIPS).

2.1. 1883 The Paris Convention and GI

The legal protection of geographical indications (GIs) on a global scale was originally established to prevent misleading uses of these products. The Paris Convention, along with subsequent regulations in the Madrid Convention, aimed to curb deceptive practices related to these goods in commerce. Furthermore, GIs, which require clear identification of their origins, were recognized as a form of industrial property needing protection under the 1883 Paris Convention. Signatory countries committed to treating these products as industrial rights and aligning their national legal frameworks with appropriate protective measures.

This agreement also regulates how the member states that have ratified the Paris Convention should deal with each other and with non-member states in this regard. The Paris Convention, which was signed in 1883, was revised in Brussels in 1900, Washington in 1911, The Hague in 1925, London in 1934, Lisbon in 1958, Stockholm in 1967 and finally finalized on 28 September 1979. This convention on the protection of

industrial property is divided into three main categories: national treatment, priority rights and some common rules. As of 2020, 177 member countries have adopted this convention, which Turkey joined in 1925 (WIPO, 2020).

While the Paris Convention does not explicitly define GIs, the Article 1 references appellations of origin and indications of source. Thus, even without providing a clear definition of GIs, the Convention offers an extensive explanation concerning related products. The Paris Convention distinguishes misleading indications from deceptive labels, as clarified in Article 10. Additionally, Article 9 imposes specific sanctions on businesses and producers who disregard prohibitions against misleading and deceptive terms. These sanctions include seizing such imported products before they reach the domestic market, banning their import, or confiscating them within the country's borders if they have already entered. However, when evaluated from various perspectives, these sanctions have proven to be somewhat ineffective, as producers continue, and even increase, the production of such products, indicating that the measures outlined in the Convention may not be sufficient (Heath, 2005:98).

The Paris Convention has been subject to different regulations and amendments since its signing. Nevertheless, it is important as it is the first treaty to establish a clear distinction between origin indications such as GIs and trademarks at the international level. The first amendment to the Paris Agreement was first brought to the agenda at the Rome Conference of 1886, and the first notable amendment was the Madrid Convention of 1891. Even though the Madrid Convention, which was concluded after this convention, contains different regulations, it is very important in terms of seeing and understanding the shortcomings of the Paris Agreement.

2.2. 1891 Madrid Agreement and GI

As soon as the Paris Convention entered into force, various efforts to improve the protection of GIs began to emerge. First of all, at the Rome Conference held in 1886, amendments to Article 10 of the Paris Convention on false and deceptive indications of origin were submitted to the member states, but no significant changes were approved by the member states, except for minor changes (Heath, 2005:98). The regulations on GIs (usually designation of origin), which were overlooked or not mentioned at all in the Paris Convention, were discussed at the 1980 Madrid Conference, and thus the regulations decided at the Madrid Conference became a complement to the Paris Convention.

Unlike the Paris Convention, the Madrid Arrangements focus not only on the legal protection of products requiring indication of origin but also on preventing the use of false and misleading labels concerning their origin (Madrid Agreement, 1981). Under these regulations, certain countries concluded that additional provisions beyond the Paris Convention (Article 10) were necessary to protect products indicating origin and initially advocated excluding items with "generic" and "descriptive" terms from protection. In contrast, Portugal argued that even generic or descriptive terms should be banned as counterfeit or misleading imitations if the product's reputation (popularity) is closely tied

to the unique conditions of the land or climate where it is produced. France, however, suggested that this regulation should be limited solely to wine products (Heath, 2005).

As a result, while the Paris Convention (Art. 9) focuses on how protection should be enforced and what the sanctions should be, the Madrid Agreement takes the Paris Convention one step further in this respect, as it is more concerned with the prevention of false and misleading source marks. This difference between the Paris Agreement and the Madrid Agreement is very important. While the Paris Agreement recognizes the recognition of these GIs without the protection of industrial property rights that need to be registered, the Lisbon Agreement of 1958, which took place after the Madrid Agreement, focused on the necessity of recognizing such products, which need to indicate origin (designation of origin), as a registered right. Hence, the Madrid Agreement served as a bridge between the Paris Agreement and the Lisbon Agreement (Heath, 2005:99).

The common aim of both the Paris and Madrid Agreements has been to establish provisions to curb unfair competition practices in trade. While the Paris Convention set forth the necessity for protecting these products, the Madrid Agreement expanded this protection through a structured framework, as outlined below, to strengthen its regulatory reach (Madrid Agreement, 1981):

- All products with counterfeit and deceptive marks related to Member States shall be confiscated upon import.
- Each country is free to refuse protection for products of another country with certain types of generic (anonymous) and identifying (clear) marks.
- The rule in Article 2 shall not apply to wine and wine-derived products. Such products will continue to be protected as appellations of origin even if they are generic (anonymous) or descriptive (explicit).

In addition to these articles, the Madrid Agreement, in addition to being a treaty with provisions directly related to the prohibition and prevention of counterfeit and deceptive signs, also includes in its scope of protection counterfeit and deceptive signs using indirect indications such as “system”, “type” and “like”.

One of the weaknesses of the Madrid Agreement is that Article 4 of the agreement leaves it to the domestic judiciary to decide whether a sign is a generic (anonymous) sign. As an exception, it is agreed that national courts cannot assign generic designations only to wine and derivative products. The Lisbon Treaty revised some articles and emphasized that no national court should have such power.

2.3. 1958 Lisbon Agreement and GI

Another treaty that is important to mention before moving on to the Lisbon Treaty is the Treaty of Versailles. With this treaty, which was signed after the Madrid Agreement, Germany, Austria Hungary and Bulgaria regulated for the first time an absolute form of protection for these special geographical products. Beyond the need to take measures against counterfeit and deceptive copies of products, this treaty also dealt

with the protection of such products as absolute property. Today, this type of absolute property protection can still be provided through bilateral agreements between countries (Heath, 2005:101). GIs, which have continued to be protected through bilateral protections, have gained strength with the Lisbon Agreement and some issues that were not mentioned in previous agreements have become open to discussion in the international arena with this agreement.

Entering into force in 1966, the first signatories to the Lisbon Treaty were France, Portugal, Cuba, Czechoslovakia, Haiti, Israel and Mexico. Later on, Italy, Hungary, Tunisia, Bulgaria, Burkina Faso, Algeria, Gabon, Togo, Congo, Czech Republic, Slovakia, Costa Rica and Yugoslavia were added to these states. With the collective ratification of the treaty by the European Union and the accession of other states, the treaty directly affects approximately 33 states (WIPO, 2021). Although Turkey has not yet signed the treaty, the fact that it has received an invitation to join the treaty and that the relevant institution is still working on this issue increases the possibility that Turkey will be among the member states in the near future (TPMK, 2018).

A key distinction of the Lisbon Agreement from previous agreements is its attempt to clarify the ambiguities surrounding the definition of GIs. In the Paris Agreement, terms like "indication of source" and "appellation of origin" were used for products that required a geographical origin reference, including those with GIs. According to the explanations provided within the agreement, these terms encompassed products that did not necessarily need to refer to distinct qualities, characteristics, or reputation associated with their place of origin (Paris Convention, 1883). Thus, in both the Paris and Madrid agreements, these expressions were utilized to highlight, either directly or indirectly, the geographical region from which a product or good originates (Madrid Agreement, 1981; Paris Convention, 1883). For instance, if a product is manufactured in Turkey or bears an association with Turkey, the phrase "produced in Turkey" is considered an "indication of source." This indication doesn't need to be explicit. For example, as illustrated in Figure 1, the depiction of Queen Amastris on a product made in Bartın Amasra serves as an indirect symbol of origin, signifying that the product was manufactured in Bartın-Amasra, Turkey.

Unlike the Paris and Madrid agreements, the Lisbon Convention on the protection and international registration of appellations of origin uses the term "appellation of origin" for appellations of origin. With this concept, the scope of the expression to be emphasized has been narrowed to some extent. The term "appellation of origin" was intended to emphasize that all or the main qualities and characteristics of the product have an inseparable connection with the region of origin and that the qualities of the product derive from the environment of the country, region or locality of origin (Lisbon Agreement, 1958).

Figure 1: Indication of source examples





Resource: (URL-1, 2018; URL-2, 2020)

Apart from these agreements, the 1992 Regulation No. 2081/92 of the European Union introduced the terms "geographical indication" for GIs and "designation of origin" for appellations of origin for the first time, thereby facilitating a clearer understanding of the scope of these products (European Union Regulation, 1992). Although this regulation has been repealed, the terms "geographical indication" and "designation of origin" continue to be used in new agreements related to this subject (Yıldız, 2007:42).

The second important aspect of the Lisbon Agreement in terms of GIs is related to the legal protection of these indications. As a result of countries claiming rights on the same product at the international level, international registration protection came to the agenda and had to be discussed and decided in this agreement. According to this agreement, in order for countries to benefit from the international protection of GIs, they must first have legal regulations regarding protection in their own countries (O'Connor, 2008). For this reason, it has become necessary for each country to make some legislative, executive or both regulations regarding the protection of GIs in its domestic law. It is included in the text of the convention that the application for international protection can only be made after these arrangements.

With this agreement, after member countries apply for international protection for certain products, other member countries are informed by the institution in charge of this issue. If there is no objection from other member countries within one year, the registration of the products is approved internationally, and the protection becomes valid from this period. It was also decided with this agreement that once the registration is valid, there is no need to renew it again (O'Connor, 2008). The determination of an implementing organization for this protection was also provided by this agreement.

Within the scope of this agreement, the World Intellectual Property Organization (WIPO) was decided as the implementing agency for the protection and registration of GIs in other countries (WIPO, 2004:4-5). Although the Lisbon Agreement provides more protection compared to the previous agreements, it only protects designations of origin and does not address designations of origin (Şentürk, 2011:23). For this reason, it has caused some countries to look at the agreement with reservations and it has been observed that some countries that can gain international commercial rent are members of this

agreement only for the protection of certain specific products. For example, compared to citrus fruits, which may not be suitable for export because they cannot be easily preserved under normal conditions, Israel's membership of the agreement for its "Jaffa" orange, which is durable enough for export, and Cuba's membership for tobacco and cigarette products that generate high export revenues are some examples of this situation (Heath, 2005:103).

Although the Lisbon Treaty regulates issues such as "the protection and application process for a product with a relevant designation of origin", "the rights conferred by protection" and "clarity on the conflict between trademark and designation of origin", it is still considered incomplete due to difficulties in implementation and issues such as the origin-designation distinction, and has created the need for a comprehensive convention that every country can ratify without debate.

2.4. TRIPS

The Agreement on Trade-Related Intellectual Property Rights (TRIPS) was signed in Marrakech, Morocco in 1994 and entered into force the following year in order to ensure global harmonization of intellectual property laws, which have different legal protection and regulations in each country. According to this agreement, which is one of the supplementary arrangements of the World Trade Organization (WTO), all WTO member countries are obliged to adopt international laws on intellectual property enacted in this context or to comply with the TRIPS articles to avoid the risk of trade sanctions (TRIPS, 1994). This agreement currently applies to 164 WTO member countries (WTO-1, 2021). Turkey became a member of the General Agreement on Tariffs and Trade (GATT) on October 17, 1954 and has been a member of the WTO since March 26, 1995 (WTO-2, 2021).

The TRIPS Agreement generally encompasses issues related to intellectual and industrial property, including copyright, trademarks and trade names, undisclosed information (trade secrets), GIs, patents, industrial designs, layouts of integrated circuits, anti-competitive practices in licensing, technology transfer, enforcement procedures, transitional arrangements, institutional arrangements, and collaboration with other international organizations (WTO-3, 2021).

The World Trade Organization has identified 10 special subjects under the title of special subjects of the TRIPS agreement (WTO-3, 2021). Since GIs are seen as a commercial element of national and international value, they were included in the TRIPS agreement, and it was deemed appropriate to examine them under the heading of "Special Topics". These issues are listed below:

- Biotechnology-biodiversity and traditional knowledge
- Climate change
- Execution and implementation
- Geographical indications
- Innovation policies

- Underdeveloped countries
- Public interest
- Technology transfer
- Public health
- Complaints that the WTO dispute settlement body may accept, even though they are not violations of the Agreement

GIs are included in Section 3 of Chapter 2 of the TRIPS agreement and consist of 3 main provisions. The first provision, Article 22 of the agreement, provides the definition of a GI and regulates the minimum level of protection required for a good or product with a GI. Article 22 of TRIPS provides a comprehensive definition of GIs. According to this agreement, GIs are used to mean "signs indicating that a good originates in any Member State and a region or place in that State, where the quality, reputation or other characteristics of the good are attributed primarily to its geographical origin" (TRIPS, 1994).

The second provision (Art. 23) provides for a higher level of protection for wines and spirits bearing GIs and additional regulations on these products bearing trademarks. It also includes provisions on a multinational GI registration and registration system for wines. The final provision, Article 24, contains certain exceptions that allow for the continued use of GIs for certain goods (generic-anonymous goods) even if they are not related to the place and location mentioned in the definition of GI (TRIPS, 1994). For example, cheddar cheese is seen as one of these exceptions.

Considering the definition of GIs set out in this agreement and the other articles of the agreement, it is observed that TRIPS is an advanced arrangement that builds on the Paris, Madrid and Lisbon agreements. The common points of the agreement with these three agreements are the protection of industrial property, the necessity to prohibit false and misleading terms in trade, and the protection of products of specific origin (Kisuule, 2015:8-9). Consequently, the protection provided in other agreements were added to the TRIPS agreement and its scope was expanded. In addition, the inclusion of an international judicial mechanism to resolve possible disputes between countries for the effective protection of these types of products has revealed the strengths of the TRIPS agreement and has become the first agreement to come to mind in terms of protection of GIs on a global scale. It is also important in terms of providing a detailed explanation to the confusion between trademarks and GIs (Heath, 2005:121).

Although all agreements, including TRIPS, have elevated the protection of GIs to an international level, countries support their interests with different protection systems in order to expand the scope of protection of these economically valuable specialty products and to ensure effective protection. For example, countries' inclusion of these products in "bilateral agreements" and "regional agreements", either general or specific, and their agreements to protect each other's products at their borders demonstrate the international economic value of the product.

3. Bilateral Agreements, Regional Agreements and GIs

In some cases, countries may demand political, political or economic integration or harmonization between them. In economic terms, the free movement of goods, services and labor across each other's borders is perceived as one of the main objectives of these agreements. The agreement may start as a simple elimination of trade barriers, or it may include bilateral or regional agreements such as free trade zones, customs union, common market or full merger, etc. with the aim of developing and increasing trade between them. An important element mentioned in these agreements is the protection of the intellectual and industrial property rights of the parties. Recently, products with IP, which have become particularly noteworthy due to the steady increase in their economic value added over the years, have begun to find a wide place in these agreements.

Countries include the protection of their products in these agreements in two ways through general and special provisions. The general form of protection is realized by using a general statement that the other country will also protect the products protected in each other's domestic laws without writing each product separately in the agreement. The term intellectual and industrial rights is usually used in this statement, and even if individual products and rights are not written in this term, it is used to declare that they protect all of each other's patents, trademarks, GIs and other rights in general terms. If there is a product on which they are in conflict and on which they do not fully agree, they can continue to implement the agreement by making a reservation on that product.

Agreements that seek special protection typically encompass not all products but rather specific ones within their scope, with products not mentioned in the agreement excluded from protection. These specified products are often appended as a list at the end of the agreement. For instance, in the context of a bilateral agreement between Turkey and Mexico or a regional trade agreement, the clause stating that "countries must respect each other's intellectual and industrial property rights" implies that GIs are regarded as industrial property, thereby implicitly highlighting all GIs under this provision. Additionally, an agreement that includes a list of specific products, such as raki, tequila, and a few others from Mexico, can be viewed as a specially regulated agreement, where the protection of these specified products is detailed regarding how and to what extent such protection will be afforded.

It has already been mentioned earlier that GI products can be protected at the national level through domestic legislation (Industrial Property Law) and at the international level through multilateral agreements (Multilateral Treaties). In addition, bilateral agreements and regional trade agreements (RTAs) are often used to strengthen the protection of these specialty products. For example, most countries in Europe have adopted most of the global agreements given in the previous section, as well as GIs regulations adopted through EU regulations in line with their membership in the European Union, which is a regional agreement (Regulation, 2012). In addition, there are also GI product regulations in the EU's bilateral trade agreements with different countries. For this reason, the size of the regional agreement increases, and the EU tends to protect

industrial property rights through bilateral trade agreements in addition to regional ones. While FTAs, which have increased with the entry into force of the TRIPS agreement, were initially bilateral, today they are often organized multilaterally (Frankel, 2017:151). In this section, some regional and bilateral agreements that are important in practice will be discussed.

3.1. Bilateral Agreements and GIs

Apart from regional agreements, countries can also enter into bilateral agreements to remove or minimize restrictions on their trade. Bilateral protection is usually realized in the form of mutual protection and the listing of both countries' products with GIs (Şentürk, 2011:19). In some cases, the trade volumes of GI products between two countries act as a catalyst to make a bilateral agreement, accelerating the agreement and affecting the structure of the agreement. In the name of speeding up such agreements, it may lead to an increase in trade diversion between countries without analyzing their own interests properly and without due diligence. However, the international trade benefits of well-worked agreements are significant for both countries, which removes all obstacles to making an agreement.

According to a study by the European Commission, the annual sales value of products with GIs is reported to be €74.76 billion. Moreover, it is emphasized that one-fifth of this revenue originates from exports outside of Europe (European Commission, 2020). Additionally, the commission's report identified the countries that receive the highest number of registered GI products from the EU, using this information to expedite future bilateral agreements. The report published in 2019 indicated that China was the largest market for GI products. Following this finding, the long-discussed and negotiated bilateral agreement on the protection of GI products between China and the European Union was expedited, concluding in 2020 and coming into force (EU-China Agreement, 2020). The acceleration of agreements with countries related to GI products resulting from this study is particularly significant for Turkey.

In addition, some important regulations are included in almost every bilateral agreement in order to prevent unfair competition. For example, bilateral agreements do not allow the use of the terms such as type, method produced, similar, like and system, which may cause diluting and misleading situations on the products of producers who do not produce products of the quality of the product with registered GIs (Heath, 2005:99).

Countries have sometimes opted to establish bilateral agreements to protect specific products and to define the relevant legal regulations surrounding those products. Through the bilateral agreement made in 1928 between France and Switzerland, two GI products, "Cognac" and "Armagnac," were mutually protected. Subsequently, after the signing of global agreements (such as the Paris and Madrid Conventions), the scope of protection was further expanded.

In bilateral communications between France and the relevant authorities in the United States (US) in 1970 and 1971, France prohibited the sale and export of "Bourbon"

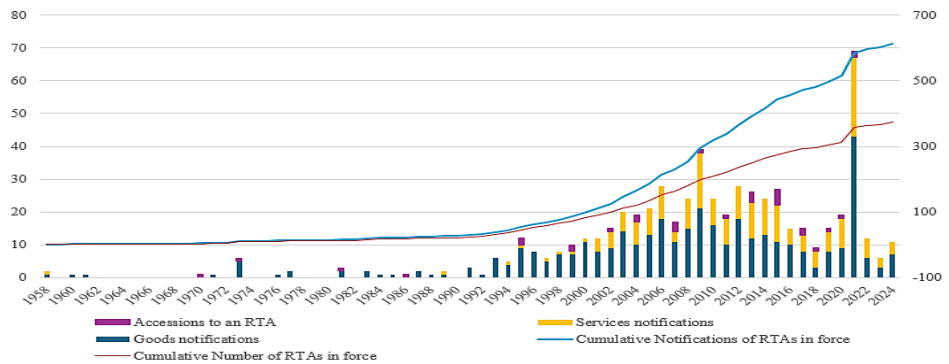
and "Bourbon whiskey" within its borders unless the products were proven not to originate from the US. In return, the US implemented the same prohibition on products that had obtained origin protection under French law, namely "Calvados," "Armagnac," and "Cognac," within its own borders (Heath, 2005:122).

Countries can often establish confusing and detailed regulations on tariffs and ease of access to their markets through bilateral agreements, provided that they comply with the principle of reciprocity. Moreover, such agreements need a continuous monitoring mechanism due to their complex structure. One of the founding objectives of the WTO was the idea that the common benefit from these bilateral agreements would be secured by a global organization and that these bilateral agreements would not be needed (Goldstein and Pevehouse, 2015:298). However, countries do not give up bilateral agreements even if they join the WTO because these agreements better protect their common benefits, and the principle of reciprocity can be implemented more easily (Oye, 1993). In case of incompatibility in WTO agreements, countries can continue their international trade through regional trade agreements as well as bilateral agreements (Goldstein and Pevehouse, 2015:299).

3.2. Regional Agreements and GIs

Despite the World Trade Organization (WTO) establishing a general framework for global trade, a significant portion of trade between countries is conducted through regional trade agreements (RTAs) that are more specific and detailed (Goldstein and Pevehouse, 2015:299). Particularly in global agreements, certain disputes and new issues can arise concerning the protection of intellectual, industrial, and normal property rights (Rodrik, 2018). Countries that cannot resolve these new disputes through trade agreements that only address general matters typically turn to agreements with a broader scope, which are referred to in the literature as Deep Regional Trade Agreements (DRTAs) (Yılmaz, 2020:45).

Figure 2: RTAs Currently in Force 1948-2024



Resource: (RTA-1, 2024)

As reported by the WTO, there are currently 373 regional trade agreements (RTAs) in force worldwide, with an additional 240 RTAs currently undergoing the accession process (Figure 2). These RTAs may assume the form of free trade agreements (FTAs), economic integration agreements (EIAs), partial scope agreements, or customs union agreements. The most prevalent type of RTA in force is the FTA, followed by the EIA, customs union agreements, and partial scope agreements (Table 1).

Table 1: By Type of Agreement

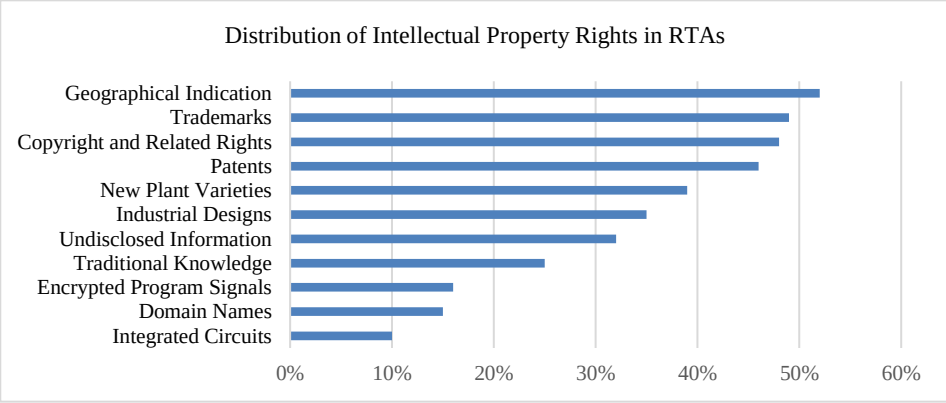
Agreement Type	Total	Agreement Type	Total
Custom Unions	17	Free Trade Agreement	335
Custom Unions - Accession	13	FTA - Accession	9
Economic Integration Agreement	203	Partial Scope Agreement	27
EIA – Accession	7	PSA - Accession	2
Grand Total			613

Resource: (RTA-2, 2024)

Countries that border each other undertake to mutually eliminate trade problems between them and create trade liberalization areas between them. They can also determine how they should treat countries that are not parties to the agreement in a common commercial manner through the Customs Union (CU), a type of BTA.

In addition to the possibilities provided by the Customs Union, countries can also turn to the Common Market, another type of BTA, to which they can add decisions to facilitate access to each other's markets for goods, services, foreign exchange and investment. These trade facilitation agreements between them can ensure full economic and trade integration, which increases the welfare of countries (Goldstein and Pevehouse, 2015:299).

Figure 3: Distribution of Intellectual Property Rights in RTAs



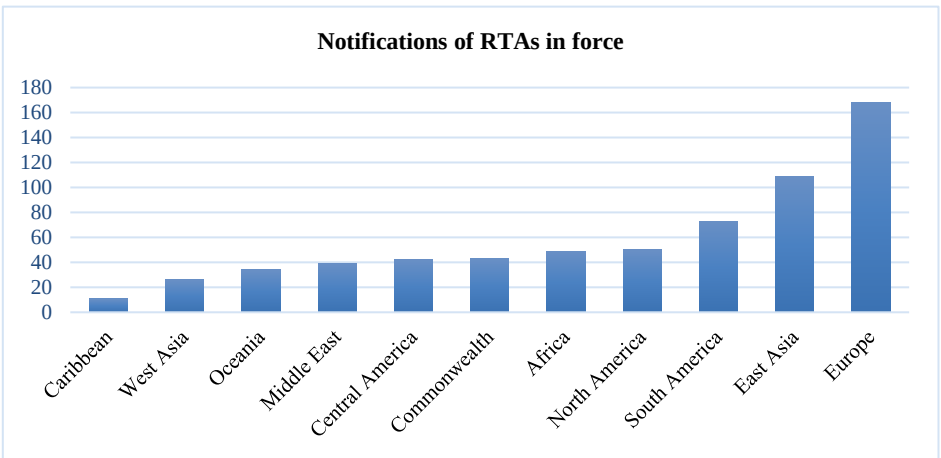
Resource: (RTA-3, 2019)

A study examining RTAs approved by the WTO between 2000 and 2015 revealed that 46% of these agreements included provisions pertaining to intellectual and industrial property rights (Acharya, 2016:10). In recent years, it has become increasingly uncommon to encounter RTAs that do not include such provisions (WTO-4, 2021). Upon analysis of RTAs in relation to intellectual and industrial property rights, it becomes evident that the most prevalent provisions pertain to GIs (Figure 3).

Regional agreements initially focused on tariff concessions but have since expanded to include intellectual property protections, particularly for GIs. These agreements have evolved into "deep regional trade agreements."

A quantitative analysis of regional agreements reveals that European countries have signed the greatest number, with over 150 agreements (Figure 4). In response to GI-related issues that could not be addressed by global agreements, European countries have turned to regional agreements such as the EU and EFTA. For example, European states overcame the confusion between the terms used for GIs in global agreements such as Lisbon, Madrid and Paris by issuing a regulation through the EU, which has a regional agreement (Yıldız, 2007).

Figure 4: Notifications of RTAs in force



Resource: (RTA-4, 2024)

The EU has been able to strengthen the protection of GIs through its regional agreement by clarifying the use of different concepts in terms of indicating GIs in international conventions and the use of Protected Designation of Origin (PDO) (Figure 5a) for the designation of origin and Protected Geographical Indication (PGI) (Figure 5b) for the indication of origin and registered designations of origin with the decision taken by the EU in a regulation. Turkish Industrial Property Law also referenced the definitions of the concepts in this regulation.

Figure 5: European Union CI logos



a. PDO **b. PGI**

Resource: (EU-1, 2024)

One of the strong effects of the regional agreement on GIs is that the European Union, in addition to this decision in the regulation, introduced a regulation that registers and certifies whether the products are GIs in order to expand the scope of products with protected GIs. In addition, the establishment of an institution for the settlement of disputes with this agreement explains the effectiveness of the regional agreement on GIs. These regulations are implemented and enforced on behalf of European states by the Commission of the European Union (EC).

As of 2010, there were 24 regional trade agreements (RTAs) signed by the European Union, which applied to its member states (Cremona, 2010). This number has increased to 36 over the past decade. Future agreements are expected to include further developments in GI protections, with lists of protected GI products attached to the agreements. Recent regional and bilateral agreements signed by the EU include the following (EU-2, 2024):

- ❖ EU-China
- ❖ EU-United Kingdom
- ❖ EU-Japan
- ❖ EU-Vietnam
- ❖ EU-Singapur
- ❖ EU-Chile
- ❖ EU-India
- ❖ EU-Philippines
- ❖ EU-Mercosur Trade Agreement
- ❖ EU-New Zeland Trade Agreement
- ❖ EU-Australia Trade Agreement
- ❖ EU-Mexican Trade Agreement
- ❖ EU-Canada Agreement (CETA)
- ❖ EU-Indonesia
- ❖ EU-Kenya
- ❖ EU-South Korea

A total of 255 products have been registered and protected under these bilateral and regional agreements, with 17 additional products awaiting registration. In total, 3,629 GI products have been registered under the EU framework, including 28 products (Table 2) from Turkey. Additionally, 61 Turkish products are awaiting registration by the European Commission (EU-3, 2024).

In addition to the European Union, other regional agreements have also included the protection of the CIs in their treaty texts. The fact that even countries with different

forms of protection meet at a common point with these agreements further increases the effectiveness of the agreement. Some countries (e.g. EU-Turkey, etc.) have separated CIs from trademark protection, which has many common points, and included them as a separate intellectual property right in their laws. This type of protection is called Sui Generis. On the other hand, some countries (USA) have continued to protect their IP products under the same heading, not separating them from the trademark right, which is an intellectual property right. Even if the type of protection is different, there is no obstacle for countries to protect their GI products through bilateral and regional agreements.

Another important regional agreement is the North American Free Trade Agreement (NAFTA, 1994), which has gained importance as it was concluded between countries where the CI protection system is carried out through trademark rights. This agreement between the United States of America (USA), Mexico and Canada were signed on August 12, 1992 and entered into force on January 1, 1994 after 4 years of negotiations. Chapter 17 of the agreement is devoted to intellectual property rights and Article 1712 specifically mentions the protection of products with GIs. The agreements made by NAFTA countries with other regions have led to certain conflicts. Canada's Comprehensive Economic and Trade Agreement (CETA) with the EU, which expanded protections for EU GIs and granted European companies' additional freedoms, caused tensions and objections from the United States.

Furthermore, Canada must carefully analyze the benefits it gains from the CETA agreement with the EU against the potential costs of commercial sanctions that the U.S. could impose through NAFTA (Viju et al., 2012). Consequently, the only solution to this conflict appeared to be for the U.S. to pursue a separate agreement with the EU, to prevent economic impacts from CETA. This need led the U.S. to seek a broader agreement with the EU that would also cover GIs (TTIP, 2013). This agreement, called the Transatlantic Trade and Investment Partnership (TTIP), is considered to be the biggest agreement in world history. TTIP was negotiated between 2013 and 2016, and although most of the issues were agreed upon, the parties could not agree on some issues and left the table. However, work is still ongoing on a new agreement that is less comprehensive than TTIP on the agreed issues but includes GIs (Amadeo, 2021).

Another regional agreement worth mentioning concerning GIs is the Southern Common Market Agreement (MERCOSUR). With the signing of the Asuncion Agreement on March 26, 1991, Argentina, Brazil, Paraguay, and Uruguay established a common market (MERCOSUR), allowing the free movement of goods, people, and capital (MERCOSUR, 1999). Venezuela later joined, bringing the total number of member states to five, while Bolivia, Chile, Colombia, Ecuador, Guyana, Peru, and Suriname hold associate membership. The significance of the MERCOSUR agreement in terms of GIs lies in its trade agreement with the EU. Annex II, Section A of this agreement includes a list of 357 EU GI products that must be protected within MERCOSUR countries, while Section B lists 220 GI products for which MERCOSUR countries seek protection in the EU (EU-MERCOSUR, 2019).

Apart from these agreements, the Regional Comprehensive Economic Partnership (RCEP) agreement, signed on November 15, 2020 between ASEAN countries and the countries with which ASEAN has signed free trade agreements, is an important regional trade agreement in terms of products with GI, which is awaiting ratification in their respective parliaments. Within the scope of the RCEP, it is aimed to protect the rights of their GI products in the agriculture, forestry and fisheries sectors, to liberalize trade and investment by removing tariffs between them, including these products, and ultimately to realize their economic unification (Kohsaka and Uchiyama, 2019:9).

The agreement between the Asia Pacific countries of Brunei, Indonesia, Laos, Thailand, Cambodia, Vietnam, Singapore, the Philippines, Malaysia, Myanmar, Indonesia, Laos, Thailand, Cambodia, Vietnam, Singapore, the Philippines, Malaysia, Myanmar, Australia, China, South Korea, Japan, and New Zealand has the potential to radically change world trade.

Table 2: Geographical Signs of Turkey registered in EU

Product Category	Type	Name	Status	Date
Bread, pastry, cakes, confectionery, biscuits and other baker's wares	PGI	Maraş Tarhanası	Registered	04.12.2023
	PGI	Antakya Künefesi	Registered	13.03.2023
	PGI	Antep Baklavası / Gaziantep Baklavası	Registered	21.12.2013
Oils and fats (butter, margarine, oil, etc.)	PDO	Aydın Memecik Zeytinyağı	Registered	05.02.2024
	PDO	Edremit Zeytinyağı	Registered	20.07.2023
	PDO	Milas Zeytinyağı	Registered	23.12.2020
Fruit, vegetables and cereals fresh or processed	PDO	Bursa Şeftalisi	Registered	15.07.2024
	PDO	Bursa Siyah İnciri	Registered	14.10.2021
	PDO	Hüyük Çileği	Registered	03.09.2024
	PDO	Ayaş Domatesi	Registered	29.11.2023
	PDO	Taşköprü Sarımsağı	Registered	16.04.2021
	PDO	Bayramiç Beyazı	Registered	16.04.2021
	PDO	Araban Sarımsağı	Registered	21.03.2024
	PDO	Aydın Kestanesi	Registered	24.09.2020
	PDO	Suruç Narı	Registered	02.06.2023
	PDO	Milas Yağlı Zeytini	Registered	08.09.2023
	PDO	Gemlik Zeytini	Registered	16.06.2023
	PDO	Çağlayancerit Cevizi	Registered	13.06.2023
	PDO	Giresun Tombul Fındığı	Registered	20.06.2022
	PDO	Edremit Körfezi Yeşil Çizik Zeytini	Registered	04.12.2023
	PDO	Osmaniye Yer Fıstığı	Registered	10.07.2024
	PDO	Malatya Kayısısı	Registered	07.07.2017
	PDO	Aydın İnciri	Registered	17.02.2016

Product Category	Type	Name	Status	Date
Dairy Products	PDO	Bingöl Balı	Registered	10.07.2024
Cotton	PGI	Söke Pamuğu	Registered	10.09.2024
Cheese	PDO	Ezine Peyniri	Registered	07.12.2023
Other Products	PDO	Safranbolu Safranı	Registered	17.01.2024
	PGI	Manisa Mesir Macunu	Registered	04.11.2024

Kaynak: (EU-3, 2024)

Africa, with its rich reserves of products like tea, coffee, and specific plants, places significant emphasis on regional trade agreements (RTAs) for GIs. The African Regional Intellectual Property Organization (ARIPO) was established in 1976 through the Lusaka Agreement, which aimed to protect these types of products across Africa (ARIPO, 2004). This organization was later restructured and renamed the African Intellectual Property Organization (OAPI), leading to the signing of the Bangui Agreement in 1977 (OAPI, 1999). These agreements, which include all African countries as members, were revised in 1999 and 2004 to expand the scope of protection for GIs.

Discussion and Conclusion

In recent years, geographical indications have gained substantial importance, not only as a tool for protecting local products but also as a strategic resource for promoting economic development. The analysis of international, bilateral, and regional agreements highlights both the strengths and limitations of existing frameworks in supporting GIs. Agreements such as the Paris and Madrid Conventions, the Lisbon Agreement and later TRIPS, established the initial foundations for protecting products with geographical origins, though they often lacked comprehensive mechanisms to address all GI-related challenges. More specialized agreements, like the EU-MERCOSUR and the EU-China bilateral agreements, illustrate the importance of tailored frameworks that protect the unique characteristics and market value of GI products.

Even if regional and bilateral agreements are the solution to international disputes and trade problems of GIs products, differences in countries' domestic regulations on GIs can still cause problems between states that have pledged to each other. Even if the agreement has been accepted in domestic law, it does not prevent the parties from bringing the dispute over GIs before their national courts. For example, the decisions of the English court on Greek Yoghurt, the Italian courts on Bavaria and Budweiser and the French court on Darjeeling products are the clearest examples of the fact that the decisions of national courts should be the remedy in some special cases (Marie Vivien, 2010).

Another negative indicator of bilateral and regional agreements is that they may indirectly affect other countries and trade agreements. For example, a possible transatlantic partnership (TTIP) between the EU and the US would indirectly affect Turkey, which has a customs union agreement with the EU, and it would become inevitable to include Turkey in the agreement.

Moreover, considering that 2.2 billion people live in Asia-Pacific countries and 30% of global trade takes place in this region, it is observed that the RCEP agreement may cause various disputes in terms of world trade as it will indirectly affect the economic welfare of European countries, the US and other countries and the agreements they have established between them (EU, T-TIP, NAFTA, CETA) (Frankel, 2017:151-155). Given the huge increase in population in this region today (nearly 4.3 billion), the impact on trade is likely to be in the same direction. Therefore, the increase in the number of countries that will be positively and negatively affected by Asia-Pasific Traders should also be taken into account.

In conclusion, although bilateral and regional agreements may have negative effects on world trade, they are widely used by countries today. Even though they may cause trade diversion, countries solve their problems related to GIs through these agreements. This situation shows that in the future, countries will put their products with GIs on the agenda through these agreements. As a result of these considerations, it is a strong assumption that countries will tend to gradually expand the list of products with GIs and the scope of protection in their agreements.

Bilateral and regional agreements can facilitate not only the protection of geographical indications but also the expansion of trade in such products. However, while these agreements facilitate reciprocal access to investment, goods and services markets, they may not be sufficient in themselves to ensure effective trade in GI products. In order for these products to be sustainably introduced to the international market, each element within their supply chain must implement a marketing strategy that is different from that of standard commercial products. Therefore, examining the marketing and establishment of an effective supply chain for GI products is of great importance for future research.

However, while these agreements contribute to protecting GIs, ensuring their successful trade and economic impact requires a sustainable marketing strategy and effective supply chain management. Bilateral and regional agreements offer crucial advantages in terms of market access, but GI products necessitate targeted marketing strategies to leverage their distinctiveness in the international market. Future research and policy development should focus on creating robust, globally recognized standards that support the integrity and trade of GIs, emphasizing the need for sustainable practices and strategic marketing to optimize their economic potential. This approach will not only safeguard local heritage and tradition but also ensure that GI products continue to thrive in an increasingly competitive global market.

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Conflict of Interest Declaration: The author(s) of the article has no personal or financial conflict of interest within the scope of the study.

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