FOOD · MEMORY · CULTURE · SOVEREIGNTY

eatWILD Responsible Value Code™

A common framework of evidence and responsibility for the olive oil value chain

Status: Proposed · consultation draft · Version 0.1 · 16 November 2026 · Comments until 31 March 2027 at eatwild.gr/code

The Code at a glance

01 **Evidence before claims.** Every claim rests on evidence that matches it.

02 **Origin is a fact to prove,** not a story to tell.

03 **Responsibility travels with the oil,** from grove to mill, tank, shelf and table.

04 **The grower stays free:** the land, the name and the right to sell remain theirs.

05 **Fair terms:** written, paid on time, with no risk pushed onto the weaker party.

06 **The same rules for every origin.** Risk is judged on evidence, never on origin alone.

07 **The consumer is owed the truth** and is invited to choose with knowledge.

08 **Public buyers get open specifications,** and equivalent proof is always accepted.

09 **No prices, no quotas, no cartels.** Economic data is shared only in aggregate.

10 **The rules bind their author first:** open to challenge, open to correction.

WHAT THE CODE IS NOT

Not a certification. Not a product label. Not a price agreement. Not a barrier to any origin. Not a condition for selling, buying or bidding. It is a public proposal of principles, open to consultation and to correction.

Preamble · Value does not end at the point of sale

The value of olive oil begins long before it reaches the market. It is shaped by land, people, knowledge, cultivation, processing and the decisions made along its journey to the consumer. Every participant can create value, preserve it, diminish it or let it be lost. Responsibility therefore cannot rest with one participant alone.

The eatWILD Responsible Value Code™ (the Code) sets out a common framework for evidence, responsibility and accountable conduct across the olive oil value chain. It does not prescribe prices, impose uniform farming practices or replace commercial independence. Its purpose is to make claims verifiable, responsibilities identifiable and value more transparent, with respect for lawful competition and for the legitimate interests of every participant.

Evidence must support claims. Responsibility must be identifiable. Value must be demonstrable.

01 · Purpose, scope and nature

The Code applies primarily to the olive oil value chain; its principles may inform other food sectors with appropriate adaptation. It addresses growers, mills, processors, bottlers, storage and transport operators, traders, exporters, distributors, retailers, hospitality businesses, public purchasers and consumers.

Nature. The Code is a public statement of principles. It is not legal advice, a certification, a guarantee of results or an assurance of environmental performance, and it replaces no legal obligation. It creates no obligation beyond the law for anyone who has not adhered to it by written agreement. If any provision is found invalid, the others are unaffected.

How to read it. "Will" marks commitments of the rights holder. "Must" marks requirements of law, conditions for using the Code's name, or obligations of those who adhere. "Should" marks recommendations. For those who adhere by written agreement, the recommendations become obligations to the extent that agreement sets out.

Reading, supporting or citing the Code creates no membership, no licence to use any mark and no approved-partner status.

02 · Evidence before claims

Every material claim about origin, quality, production method, environmental performance or product characteristics should rest on verifiable evidence that relates to that specific claim, in proportion to its significance.

A practice is not proof of an outcome. Origin is not proof of superior quality. An intention is not a result.

Where evidence is incomplete, the limitation should be disclosed, and a proposed improvement should never be presented as achieved. The professional who makes a claim remains responsible for substantiating it.

03 · Growers · productive capacity and independence

Growers contribute knowledge, labour, land stewardship and capital, and carry the largest production and climate risks.

Responsible cultivation should maintain productive capacity, protect soil and water, use inputs purposefully and document material practices and results. Lower input use is not automatically better: it should be judged together with yield, total cost, soil condition and risk. Practices should suit the soil, climate, crop and local evidence.

A grove may produce marketable oil, protect a landscape, or both. Each function should be assessed on its own evidence: production on yield, quality and cost; landscape stewardship on measured or documented results for soil, water, biodiversity, fire risk and cultural continuity, not on appearance alone. The same result should never be credited or rewarded twice.

In any programme initiated under the Code, participation will never, of itself, require the transfer of land, the surrender of commercial independence or sale through a particular channel.

04 · Mills and processors · preserving identity

Processing is where identity and quality are preserved or lost. Mills and processors should keep reception and processing records, keep lots separate where a claim depends on it, monitor material conditions and reconcile quantities in and out.

Any blending or treatment that affects a declared characteristic should be recorded and carried into all later documents and claims. Material discrepancies should be resolved before release. Traceability is a continuous responsibility, not a label added at the end.

05 · Bottling and packaging · accuracy and integrity

Statements of origin, category, cultivar, quality and method must be used only where the law permits them, and should be substantiated. Packaging should protect the product for its intended life. Design, imagery and storytelling should never suggest more than the evidence supports.

06 · Storage, transport and bulk lots

Responsibility continues after the oil leaves the mill. Storage and transport operators should keep suitable conditions, preserve the identity of lots and consignments and record material deviations. Where a lot-traceability procedure applies, dispatch, receipt, changes in quantity and transfers should be linked to records and to the documents the law requires; digital records do not replace physical checks or legal duties.

For bulk oil, legal food safety and alignment of cultivation practices are two separate questions, assessed on the same objective criteria for every origin (Annex A). A lot without verifiable cultivation records should not be described as unsafe for that reason alone.

07 · Trade and distribution · fair commercial conduct

Responsible commercial relationships rest on written, understandable terms, defined responsibilities, transparent payment, fair handling of complaints, returns and disputes, and protection of confidential information.

Where Directive (EU) 2019/633 applies, payment must not come later than 30 days for perishable and 60 days for other agricultural and food products, counted as the law provides; national rules may be stricter (Annex C).

A commercial relationship does not justify pushing risks or unagreed costs onto the weaker party. The Code sets no prices, margins, purchasing conditions or volumes among independent competitors.

08 · Retail and hospitality · information at the point of choice

Descriptions, origin statements and quality claims should match the product actually supplied, and storage and handling should preserve it. In promotions, origin should be shown as clearly as the price, so that a discount never hides what is being bought. A story, a package or a symbol does not replace evidence.

09 · Consumer charter · knowledge and shared responsibility

Consumers shape demand and, over time, the market. They should be able to rely on truthful and intelligible information.

Consumers are entitled to:

- accurate product information, including everything the law requires;
- reliable statements of origin and composition;
- substantiated claims about quality and characteristics;
- protection against misleading practices;

- access to complaint and redress procedures.

Consumers are invited to:

- look at the information, not only the advertising;
- recognise the value of documented quality;
- store and use products well;
- reduce avoidable food waste;
- weigh the wider consequences of their purchases where reliable information exists.

When sufficient verified data exist, the rights holder will publish aggregated explanations of how value is shared along the chain, without disclosing any business's confidential costs, prices or margins. Shared responsibility never shifts to consumers the professional's legal duty to substantiate claims.

10 · Public purchasers · responsible procurement

Hospitals, care institutions, schools, universities, military facilities and other public catering buy food for many people and can raise the standard through lawful, objective and verifiable specifications. A separate Public Procurement Specifications Guide will cover quality and compliance, traceability and documentation, packaging for the intended use, and conditions of transport, storage and preservation.

Procurement criteria must be linked to the subject matter of the contract, proportionate, verifiable and consistent with procurement law, and equivalent evidence must be accepted where the law requires it. No tender should require membership in, or approval by, any private initiative, including this one. The Guide is a separate, adaptable work, not an official standard or a recommendation of any authority.

11 · Economic information and competition

Understanding value requires reliable data on production, costs and transactions. Commercially sensitive information must be protected in accordance with the law and the agreements under which it was given; public reporting should use data aggregated enough to protect every participant.

Collective data mechanisms must not be used to exchange information on future prices, intended volumes, customers or other competitively sensitive matters. Any sustainability agreement that relies on a special competition-law provision, such as Article 210a of Regulation (EU) No 1308/2013, will be assessed separately before it is applied.

12 · Reports, corrections and remedies

A credible framework must be open to challenge. Anyone may report a concern about quality, origin, information, commercial conduct or the conduct of the rights holder, through the form at eatwild.gr/code or by email to foteini.papadopoulou@eatwild.gr.

The rights holder will acknowledge receipt within two working days, give a first reasoned response within fifteen working days, state who handled the report and the limits of the review, and record material findings and corrections, subject to confidentiality and the law.

Reports about the rights holder follow the same rules. A reviewer will be called independent only after written acceptance of the role, defined terms of reference and a conflict-of-interest check; until then every review is internal and will be described as internal. Independent reviewer: [to be appointed].

The procedure does not replace authorities, courts, consumer rights, recalls or other remedies. No one should suffer retaliation for a good-faith, evidence-based report.

13 · Commitments of the rights holder

The rights holder applies the Code first to her own claims, documents and activities. She will:

- hold her own public claims to the same standard of evidence;
- use the status terms of Annex B exactly;

- publish material corrections, stating what changed and why;
- keep a record of reports and responses;
- correct or withdraw any statement that cannot be supported.

Accountability begins with the author of the rules.

14 · Adherence, marks and labels

Supporting the Code, adhering to it by written agreement and being allowed to use related marks are three different things. Formal participation must be set out in writing, with its obligations, controls and consequences. Acceptance of the Code grants no trade-mark rights, verification status or certification.

Not a product label. The name or any logo of the Code must not be used on packaging, labels, product advertising or at the point of sale as an indication of environmental, social or quality performance. From 27 September 2026, EU law prohibits sustainability labels that are not based on a certification scheme or established by public authorities, and the Code is neither. Any future use on products would require a separate, lawful scheme.

15 · Revision and document control

The Code will be revised in the light of consultation, evidence, experience and changes in the law. Each edition states its version, date and material changes, and a SHA-256 fingerprint of every published file is listed at eatwild.gr/editions. The language rule in the rights notice applies. This draft is Proposed (Annex B).

Annex A · Bulk lots: two separate questions

- Legal food safety. Does the lot comply with the applicable maximum residue levels and other food-safety requirements? Residue limits are set for olives; the oil is assessed with appropriate processing factors (Article 20 of Regulation (EC) No 396/2005), and fat-soluble substances may concentrate in the oil. A laboratory result should be interpreted only with the correct processing factor and analytical method.
- Alignment of cultivation practices. Do records show which plant protection products and active substances were used, and whether practices align with EU plant-protection standards and any additional, objectively defined criteria of a programme? Laboratory results alone cannot show which practices were followed. A substance not approved for use in the EU does not, by itself, make an imported product unlawful, because EU law may allow import tolerances.

Risk assessment should rest on objective criteria applied equally to every origin. Origin outside the EU may be taken into account as a documented risk factor, in line with the findings of the European Court of Auditors on limited checks of imported olive oil (Special Report 01/2026), but never as evidence that a particular lot is non-compliant. Any requirement for cultivation records applies to every lot that claims alignment, whatever its origin. Sampling, analytical scope and acceptance rules are not set out in the Code.

Annex B · Status terms

These terms are used consistently in the Code and in related documents.

- Proposed: presented for consideration, without formal approval. No implementation is implied.
- Adopted: formally approved by an authorised decision, supported by a dated record. Adoption does not mean implementation.
- Under development: documented design, preparation, testing or implementation is in progress. Not to be described as operational.
- Operational: functioning in practice, with accountable persons, applicable procedures and dated records of actual activity within the declared scope.
- Independently verified: a specified claim, result or process examined by a competent

party sufficiently independent of the activity, against identified evidence and criteria, with a documented conclusion. Valid only for the scope actually examined.

These terms are not a single ladder. Independent verification describes the evidence and independence of an assessment; it does not certify an entire organisation, method or programme.

Annex C · Legal references, for orientation

Orientation only, not legal advice. The current consolidated text on EUR-Lex prevails.

- Directive (EU) 2019/633 on unfair trading practices in the agricultural and food supply chain, Article 3(1)(a): the period runs from delivery, or from the end of the agreed delivery period for regular deliveries, or from the date the amount payable is set, whichever is later. In Greece, Law 4792/2021 (Government Gazette A 54/9.4.2021), Article 3, as in force.
- Regulation (EU) No 1308/2013, common organisation of the markets, Article 210a, and the Commission Guidelines on its application (OJ C, C/2023/1446).
- Regulation (EC) No 396/2005 on maximum residue levels of pesticides, Article 3(2)(g) and Article 6(2) and (4) (import tolerances), Article 20 (processed products).
- Regulation (EC) No 178/2002, general food law, Article 18 (traceability).
- Regulation (EU) No 1169/2011 on food information to consumers.
- Delegated Regulation (EU) 2022/2104, marketing standards for olive oil.
- Directive 2005/29/EC on unfair commercial practices, as amended by Directive (EU) 2024/825 (applicable from 27 September 2026).
- Directive 2014/24/EU on public procurement, Articles 42 to 44.
- European Court of Auditors, Special Report 01/2026, Control systems for olive oil in the EU: a comprehensive framework, but unevenly applied.

Responsible value does not require every participant to act in the same way.

It requires each participant to support what they claim, to accept responsibility for what they control and to respect the legitimate independence of others.

The future of food is shaped neither by the field alone nor by the market alone. It is shaped by the decisions that connect them, and by our willingness to examine their consequences.

IN MEMORIAM MAIORUM · IN SPEM FUTURI

eatWILD™ Real Food for Real People is a composite mark registered in Greece (OBI N232725). Other names and phrases marked ™ are claimed, not registered.

Licensed under CC BY-ND 4.0 (creativecommons.org/licenses/by-nd/4.0): share unchanged, with attribution, including for commercial purposes. The licence grants no rights in the marks, the logo or the images, and no permission to suggest endorsement, certification or partnership. Rights are claimed under trade mark, copyright and unfair-competition law, as applicable. The separate Public Procurement Specifications Guide carries its own licence (CC BY 4.0), which does not change the licence of the Code.

Public statement of principles in consultation · Status: Proposed. Human-originated · AI-assisted drafting, editing and design. Human editorial direction and responsibility govern this publication. The English text is the reference text; the Greek and German texts are renderings of it. In case of divergence the English text prevails.

© 2026 Φωτεινή Παπαδοπούλου · Foteini Papadopoulou · Greece · author and rights holder