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Produits du Terroir: Similarities and Differences Between France, Québec and Vermont

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ABSTRACT

Terroir is a word that carries powerful cultural and sensory associations in France. Although roughly translated a “taste of place,” *terroir* is more difficult to translate as a cultural concept. *Terroir* in France represents sensory qualities of food that capture a dynamic engagement between people, place and taste. This engagement can be seen in the decisions made by individual food producers to craft a product characteristic of their region. In France this engagement also extends to a conversation between those producing food and the regulators and researchers charged with monitoring and promoting specific products understood to have an exceptional relationship to place. This cooperation between multiple partners helps maintain an authentic sense of *terroir* within the modern, global food system.

In both Québec and Vermont the provincial or state governments have developed a keen interest in the European investment in Protected Designation of Origin (PDO) and Geographic Indications (GI). To what extent could Vermont and Québec lead the way in developing and protecting the first New World *produits du terroir* with designations parallel to those found in Europe? This essay compares the different levels of engagement between product, practice and place found in France, Québec and Vermont.



KEY FINDINGS

- The European model has been remarkably successful as both a strategy for EU countries and an inspiration for other regions to pursue their own version of recognized *produits du terroir*.
- Québec has already drafted legislation similar to Protected Designation of Origin.
- Vermont’s approach could create a new understanding of a unique, place-based product.

Introduction

Terroir is a word that carries powerful cultural and sensory associations in France. Although roughly translated a “taste of place,” *terroir* is more difficult to translate as a cultural concept. *Terroir* in France represents sensory qualities of food that capture a dynamic engagement between people, place and taste. This engagement can be seen in the decisions made by individual food producers to craft a product characteristic of their region. For example, winemakers’ decision about the location of a vineyard, the variety of grape grown in that locale, the methods used to turn the grape juice into wine, and the stories told about

what makes such wine unique are one form of engagement in the taste of place.

But in France this engagement also extends to a conversation between those producing food and the regulators and researchers charged with monitoring and promoting specific products understood to have an exceptional relationship to place. This cooperation between multiple partners helps maintain an authentic sense of *terroir* within the modern, global food system.

The French approach to *terroir* is associated with both everyday practice and institutionalized rules and regulations. The regulatory aspect of recognizing *produits du terroir* has helped build a new engagement with *terroir* that is no longer situated exclusively in France but rather in varied territory around the globe. The European Union has used France’s policy and legislation based on *terroir*, the renowned system of controlled designation of origin - *Appellations d’Origine Contrôlée* (AOC) - as the basis for a larger initiative, Protected Designation of Origin (PDO). In fact the French AOC system helped determine the fundamental vision of the even broader system of Geographic Indications (GI). The contemporary definition, which combines practical and regulatory components, relies on three basic parameters: identification of a unique geographic region, establishment of

a collective *savoir-faire* (or know-how), and demonstration of a cultural tradition.

Today this new engagement has started to extend beyond Europe and can be seen in more preliminary stages in both the province of Québec in Canada and the state of Vermont in the United States. In many respects a distinct bioregion bisected by a national border, presently there is much *terroir* inspired activity both north and south. In both Québec and Vermont there is a continuous collective tradition of making maple syrup to be sold both locally and globally. In both Québec and Vermont vibrant communities of farmstead cheesemakers have emerged over the past 35 years. In both Québec and Vermont we see a clear wish to grow and raise high quality, unique food products expanding beyond maple syrup and cheese to include other agricultural sectors. In both Québec and Vermont there is an increased effort to promote culinary tourism based on the uniqueness of the landscape and foodways of their respective regions. All these initiatives focus on food products that are both distinctive and provide a gateway to understanding the culture of a region.

Another movement intersecting with the emerging concept of the taste of place is a heightened interest in sourcing “local” products. Consumers understand “local” to be essentially different from the industrially produced commodities that dominate the marketplace in both regions. However, the measurement of local in Vermont and Québec relies primarily on distances traveled between producer and consumer and not the European notion of *terroir* and *produits du terroir* that convey a taste characteristic of a local region. The difference may be referred to as one between local products (measured by miles traveled) and products from a locale (measured by the European standards of quality and locale). The dissonances between these two perspectives reveal deep cultural, economic and institutional divides between the Old and New World. A great distance exists between the acknowledgement of a small farmer’s local product and the acknowledgement of that product’s unique qualities by the state. In fact, even the concept of “unique” is not commonly understood – in

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the European GI system it is tied to the *savoir faire* of a group, in the United States it is tied to closely held practices of an individual farmer or single business. The combination of similar interests and such different cultural and political contexts is a divide that requires a more careful examination of perils, possibilities and consequences.

Meanwhile, what is *terroir* in the shared landscape of Québec and Vermont, characterized by long cold winters, rocky soils, and mountainous terrain? Is it relevant to say that a locale can create unique *produits du terroir*? What is the connection between such a landscape and the *savoir-faire* of those involved in making food and drink given very different colonial and national histories? What unites and what divides in an era of fierce market competition in a global marketplace? In both Québec and Vermont the provincial or state governments have developed a keen interest in the European investment in protected denomination of origin (PDO) and geographic indications (GI). To what extent could Vermont and Québec lead the way in developing and protecting the first New World *produits du terroir* with designations parallel to those found in Europe? The long-term European engagement with the link between taste and place means numerous scholarly research projects, for example in geology, geography, anthropology and history, have been undertaken there. Here in North America, however, we are just beginning to ask similar questions about our food and drink, where they come from, how they are made, and the implications for the sustainability of the working landscape. This essay compares the different levels of engagement between product, practice and place found in France, Québec and Vermont.

Terroir Products in Europe

The European quality label system for local products is directly inspired by the French labels of origin system (*Appellations d'Origine Contrôlée* or AOC) that dates to the early 20th century. Almost a century later, in 1992, a similar system was adopted by the multi-national European Union under the

name of Protected Denomination of Origin (PDO). At this juncture the long and often complicated history of how such quality label systems were developed is not necessary, but both systems have struggled with concerns about provenance and politics (see Guy 2005 and Boisard 2005). The advantages of the European system include the enhancement of the quality of such products and the protection against fraud. Other concomitant benefits include an overall perception of sensory quality, the preservation of traditional foodways, and greater economic benefits to small producers and rural areas. In France, a centralized bureaucracy (*Institut National des Appellations d'Origine*) has oversight over the entire program with assistance from offices in every province.

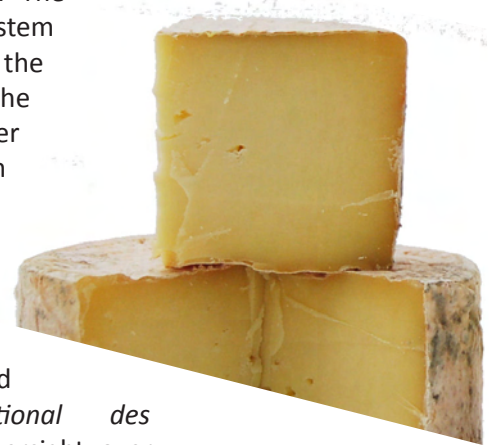
Therefore, local, regional and national entities are always involved in dialogue about these foods and drinks and producer groups have a local contact to work with as they develop product standards. All of these aspects drive the three official categories for local products.

1 The protected *appellations d'origine* are given to products that fulfill the following conditions:

- Demonstrable links between unique environmental factors and the final taste of a product. Underlying research outlines geographical boundaries within which farmers share a common natural environment for their production.
- Collectively shared production practices and knowledge.
- Interaction of environmental and human factors to produce a food item that cannot be reproduced anywhere else in the world.

Thus a controlled appellation label recognizes the specific natural and cultural qualities that create a unique food or drink.

2 The second appellation, protected geographic origin maintains the necessity of a uniquely defined geographic



region but does not have such strict requirements about shared practices and distinctive sensory characteristics.

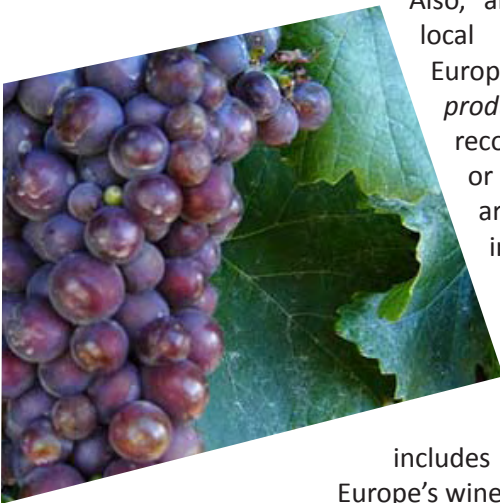
3 Finally, for the guaranteed traditional specialties the important factor is the collective practices of the producers, with unique production as the most important requirement.

These three categories of quality labels, which encompass a variety of situations and types of products, today shape consumers' confidence and their allegiance to certain foods. The array of products that fall within these categories helps express regional and national identities around food, carrying a sense of heritage and identity to all Europeans.

Also, although there are numerous local products made throughout Europe that could be considered *produits du terroir*, those that are recognized by national legislation or European Union legislation are considered the best and are increasingly being examined through research and analysis.

Twenty five years later the results are impressive: 3,000 European products have been recognized, which

includes an estimated two-thirds of Europe's wines and cheeses.



The Case of Vermont

In the United States there are various certification systems that can be seen to parallel the broader system of geographic indications, but none which contain all the elements articulated in the European system. American Viticultural Areas (AVA) and Country of Origin Labelling (COOL) offer geography-based designations, but rely solely on defining or naming geographic areas without any investments in collective savoir-faire or shared standards of practice. The COOL labels are designated solely by countries of origin. AVAs can be awarded to wine growing regions as small as 1,700 acres (Santa Rita Hills) and as large as 16,640,000 acres (Ohio River Valley). Thus, these systems allow individuals to make their own choices within the demarcated domain, with

trademarks serving more as the mode of differentiation.

Trademarks coupled with a system of geographical demarcation similar to AVAs used for wine bring producers closer to the European model. However, as Giovannucci, Barham, and Pirog point out, trademarks still have striking differences:

“Trademarks and GIs are complementary but distinct. Trademarks are the exclusive right of an owner or producer and distinguish the products of one from those of another. They are distinctive rather than descriptive and they may usually be produced anywhere. GIs are the shared right of all the producers of a given product that are located in the specific geographical area. They identify products with a certain quality and reputation associated with their geographical origin.”

In Europe the collective value of maintaining rural working landscapes by promoting and protecting the *produits du terroir* that come from these regions is widely accepted as parallel to any specific individual trademarks. In the United States there are far fewer instances of collective rights to a certain set of practices in a specified geographic region and fewer still where the quality and unique character of those place-based products are independently authenticated before a label is applied.

Vermont offers a natural starting point for bringing together the European and American approaches to overseeing local products and a link to quality. Vermont is one of the states most well known throughout the United States for producing food of unique and high quality. This recognition has a long cultural history related to Vermonters' strong identification with the agrarian landscape. Furthermore, Vermont has participated as a pioneer to two relevant labeling initiatives: organic standards and the Vermont Seal of Quality.

Organic standards began as a grassroots, collective farmer movement to represent a shared commitment to the land, environmental integrity, and sustainable small food systems. Vermont was an early leader in this movement; the Vermont

chapter of the Northeast Organic Farming Association is one of the oldest organic farming associations in the country (founded in 1971). The early stages of organic standards represented an effort by farmers to distinguish foods based on the production systems and philosophy behind them, and to find ways of guaranteeing claims that could not be experienced directly by the consumer, such as environmental stewardship. Similarly, geographical indicators are producer led movements, representing multiple steps in the production system, and certifying attributes that consumers cannot independently verify based on their experience of the product, such as whether the character of a cheese really represents centuries' old traditions.

Over the last several decades, the nature of the organic movement in the United States has changed considerably. Increasing consumer demand and interest from regional and national chain outlets supported a need for common, country-wide standards. These standards left out previous articulations of "organic" that consumers would now recognize as promoting the quality of local food system. Introduction of federal regulation also fundamentally changed the dynamic between local producers and the now federal regulators managing those standards. Chronologically, this evolution follows the same time period, starting in the 1970's, as the Vermont Seal of Quality. The Seal of Quality, however, represents a labeling system that stayed much closer to the local producer groups that helped in its inception.

The Vermont Seal of Quality or V.S.A. § 171-180, grants the Secretary of Agriculture authority to establish grades, standards, brands, labels or trademarks for farm products and provides for penalties for the unlawful uses of the Vermont Seal of Quality. The products must be Vermont produced agricultural products (defined as a minimum of 85% of total ingredients must be comprised of Vermont agricultural products), and meet or exceed the top two federal United States Department of Agriculture grades. In general, products must be produced in Vermont. This framework provides for

a geographical link (Vermont), baseline quality level (USDA grades) and leeway for the Secretary of Agriculture to develop and enforce additional requirements. In practice, that authority for standards development has led to a cooperation between regulators and producer groups, similar to the producer-led development of the European standards.

Vermont's maple syrup producers have made the most extensive use of the Seal of Quality in the last 34 years since its inception. Vermont has always maintained standards of grade and flavor for its signature maple syrup; Seal of Quality designation reaches further to include the entire production facility and all aspects of the final product, such as packaging and labeling. Vermont Agency of Agriculture consumer protection specialists worked closely with the Vermont Maple Industry Council to set these standards. Experience with the Seal of Quality and maple syrup has demonstrated the ability for regulators and producer groups to work together to develop meaningful, enforceable voluntary quality standards and the link between successful implementation of credible standards and developing markets for inherently premium products.

Critical differences still exist between the Seal of Quality and PDO or AOC systems. Seal of Quality only corresponds to quality, not to unique quality or quality linked with place of origin (either through natural environment or local traditions). It is individual producers who incorporate the characteristics of a region into the taste and story of their product, without including collective knowledge or a third party system for authenticating the producers' claims. Moving towards the more complicated system represented by the European model will require new forms of implementation. Maintaining an authentic PDO label involves support of both researchers to set standards and regulators to help maintain standards, all in concert with highly organized producer groups. Vermont does not currently have those resources available in either developing standards or enforcing

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ing them. Finally, none of these background steps include the consideration of engaging consumers; while the American consumer may understand “quality” or even the reputation of “Vermont” with signature products like maple syrup, is the cultural understanding of terroir in place?

Since 2008, the Vermont Agency of Agriculture has been working with producers and researchers at the University of Vermont to build momentum for exploring a designation that more closely resembles the European quality labeling system. The initiative, Taste of Place, is seen as a concept that captures many of the things that define the character of Vermont: farming communities, strong rural traditions, and the belief that it does matter where your food comes from. The initiative uses the principles adopted by the European Union for identifying *produits du terroir* as the starting point for a dialogue between government officials and producers from all agricultural sectors (although the focus right now is on discussions with farmstead cheesemakers and maple sugarmakers).

Much of the present work seeks to identify direct connections and more direct inspirations that come from looking closely at the French model. This research framework was developed by the Vermont Agency of Agriculture:

“All of the Taste of Place products assume a starting level of being distinguished by high quality. Commodity products in an un-altered state, for example, would not be part of these systems. However, beyond that premise, there are several different avenues that can be taken and Vermont needs to decide what combination to use for its own policies.”

The dialogue continues: recently (in September 2009) the Governor of Vermont and the state’s Secretary of Agriculture went on a trip sponsored by the French Embassy to further explore France’s system of appellations. There may be real possibilities for a direct link between everyday practice and governmental involvement for Vermont *produits du terroir*.¹

The Case of Québec

In Canada no similar quality label system exists to that of the European Union. However, notably in the setting of international trade based on mutual recognition, Canada does recognize protected denomination of origin in the world of wine. The equivalent to the Europeans is a recognition of certifications established by provincial wine associations if and when they exist. In this case, the notion of origin is very broad and does not completely compare with the European concept of specific vineyards, vintages and natural environments because the size of the delineated territories in Canada ranges greatly. However, this does not mean that the concept of quality does not exist for Canadian wine; provincial wine associations do have complex parameters to create assurances of quality in traditional wines. Thus in Canada, there is a unique quality system as much like Europe as North America. This system has not been fully adopted by all wine producers and a number of wine associations have recently decided to follow such a path. There will thus probably be official certifications in the future.

The province of Québec is the first and only Canadian province to pass a provincial law inspired by the European quality label system. In 2006 the *Loi sur les appellations réservées et les termes valorisant* was passed. This law created a legal statute for regulating products given that conditions of production and shared or “typical” tastes that are linked to a specific geography and certain production methods. A working group has subsequently developed a definition of “*produits du terroir*.” This definition is as follows: A product where the principal ingredients come from a specific and similar territory where the distinguishing characteristics of the product lie in unique aspects of the territory. These distinguishing characteristics depend, at the same time, on the specific context of each product and can include geology, climate, topography, culture, history, traditional or innovative practices of the artisans.” At this point, the law really serves as a launch for what is still a grand experiment. It remains to be seen how the law will get translated into practices as well as the long term cultural and economic benefits.



In January 2008, the Quebec provincial government created the *Conseil des appellations reservees et des termes valorisants* (CARTV) which is now responsible for overseeing designations, labels and claims of added value in Quebec. The CARTV helps producers develop the manuals creating the specifications for designations and also organizes third-party certifications. Since inception, CARTV has worked to clarify the categories of reserved designations under its purview, which are now defined as relating to a method of production (such as organic), a link to terroir (such as geographic indication), or specificity (such as farmstead). CARTV has implemented a process that any possible product needs to go through in order to obtain a designation. This involves six steps:

1. Submission of an application
2. Evaluation by an expert committee
3. On-site meeting
4. Public consultation
5. Final evaluation
6. Final recommendation

Two reserved designations had been awarded as of June 2010: *agriculture biologique* (organic) and *agneau de Charlevoix* (Charlevoix Lamb). There are five more projects underway, with a goal of 10-20 designations by 2018.

Conclusion

In conclusion, as the European model has been remarkably successful as both a strategy for EU countries and an inspiration for other regions to pursue their own version of recognized produits du terroir. Québec has already drafted legislation similar to PDOs. Other processes to support quality labels are developing in both Vermont and Québec. Vermont's approach is particularly remarkable given that it not only would create a new understanding of a unique, place-based product, but the United States federal

government since 2004 has been opposed to Europe's quality label systems because they were seen as a form of free market protectionism. However, the World Trade Organization opposed this position and now the doors are open for real recognition of a similar quality label system in the United States. It appears that profound cultural changes in the United States about how best to organize the food system have begun to transform the perception and practices relating to connecting place, practice and product.

In the case of certifying wine in Canada, a similar approach as the United States federal policy was adopted but here specific groups could still create a certification and this was not seen as directly opposed to the grander schemes of the provincial governments. The groups in Canada that have been mobilized to create place based certifications or appellations were not the same; in one case it was the grassroots initiative of the wine producers to demarcate their own products and in the other case it was the government initiative to create legislation with international provenance. But these two approaches are far from being incompatible; rather they can be seen as complementary because the present certification can be seen as a transition stage, assuring a link between practice, place and product, moving towards a government system that assures protection to both producers and consumer.

In both Vermont and Québec the future remains promising if uncertain in regards to creating a quality label system. The times seem perfect, however, for a thoughtful and thorough consideration of New World terroir and the unique local foods of the region. Hopefully this consideration will integrate a commitment to economic well-being, cultural heritage and innovation, and food and drink that are a pleasure for all to savor and enjoy.

Vermont's approach could create a new understanding of a unique, place-based product.

END NOTE

1. State officials shelved the Vermont Seal of Quality program in March, 2010, due to insufficient funding. In April, the state Legislature approved a measure that would use federal stimulus money "to develop and implement a third party verification or audit process to enable the Vermont seal of quality program to be resumed with strict quality review and approval standards." (Act 78 Sec. 6a (e)). The act amended Sec. 6b. 6 V.S.A. § 2964 (Vermont Agricultural Products; Identification and Definition; Seal Of Quality) to give the secretary of agriculture the ability to design and implement a third party verification process. Act 78 also classifies misuse of the identification labels as a civil violation. The act also requires that the Seal of Quality program be resumed no later than July 1, 2011, and requires an interim process and an appropriate fee structure for administering the authorization and use of identification labels – limited to maple and dairy products - that meet current quality standards.

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An Act Relating to the Vermont Recovery and Reinvestment Act of 2010, Sec. 6b. 6 V.S.A. § 2964 (Act. 78, 2010).

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