FOCUSED CONSULTATION REPORT

Revision of FSC-STD-50-001 - Conceptual phase

14/08/2024

FSC FORESTS FOR ALL FOREVER™

FOREWORD AND INTRODUCTION

Introduction

FSC would like to thank all stakeholders for their participation in the focused consultation on the revision of FSC-STD-50-001 *Requirements for Use of the FSC Trademarks by Certificate Holders.*

We would also like to thank all stakeholders who participated in the 15 webinars and workshops held during the conceptual phase. The feedback captured in these side events has been used as additional input to the qualitative analysis.

This consultation report has been prepared following Clause 6.11 of *FSC-PRO-01-001 V4 Development and Revision of FSC Requirements* and contains an analysis of the range of stakeholder groups who submitted comments, as well as a summary of the responses and comments provided. A general response to the comments and an indication as to how the issues will be addressed are provided in the document.

Background information on the processes

FSC is revising the trademark standard *Requirements for use of the FSC trademarks by certificate holders* (FSC-STD-50-001). This document contains the requirements and guidelines for using the FSC trademarks by FSC certificate holders. It covers the labelling and promotion of products with FSC trademarks, as well as the promotion of an organization's status as an FSC certificate holder.

The current revision process was kicked off in September 2023. As part of the conceptual phase, the process team has organized 15 webinars and workshops and carried out a focused consultation to determine the scope of the revision. The focused consultation was opened on March 15th, 2024, and closed on April 15th, 2024.

This document summarizes the feedback captured during the focused consultation on the proposed revision topics.

For further information related to the revision process, please visit the dedicated webpage here. For comments or questions related to the revision process, please contact Santiago Morales, project lead, at m.morales@fsc.org.

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Participation in the consultation

Participants by groups of stakeholders

A total of 28 stakeholders participated in the focused consultation through the FSC Consultation Platform. Participants came from 14 countries. Europe is the continent with the highest number of participants, while Africa has the lowest number of participants.
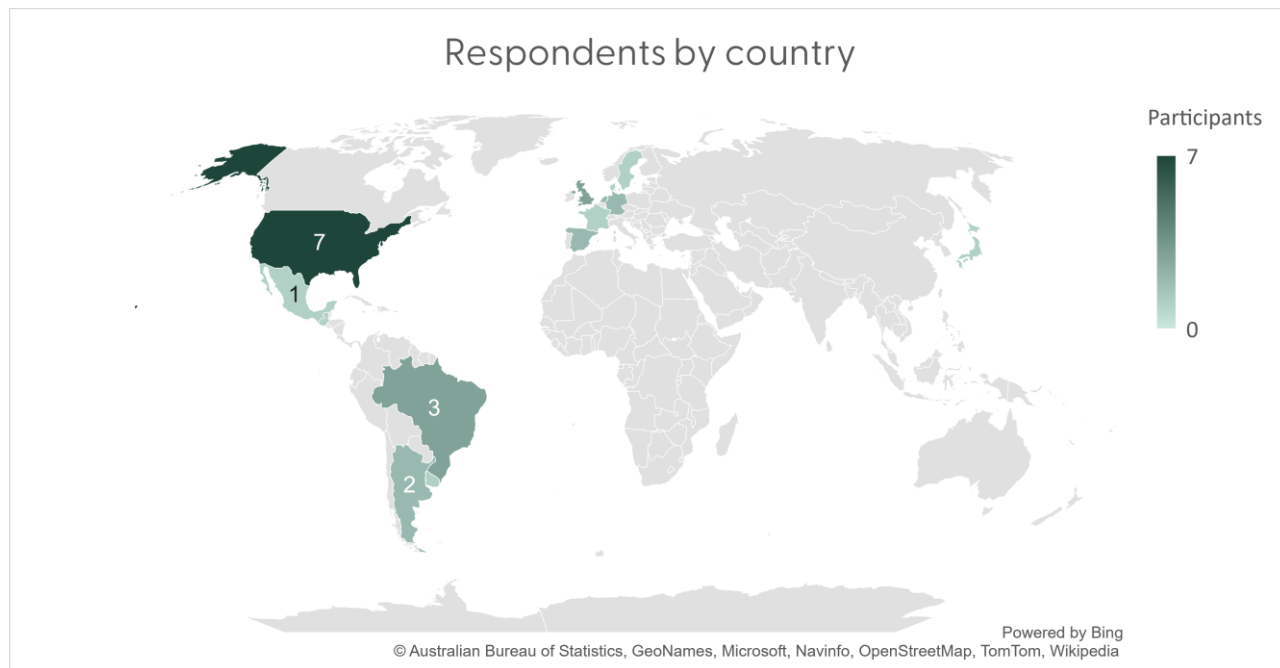

Figure 1

Participants by groups of stakeholders

Respondents were asked to identify themselves according to stakeholder category. Based on the responses, participants were grouped into 7 different stakeholder groups. 39% of the total number of participants were certificate holders.
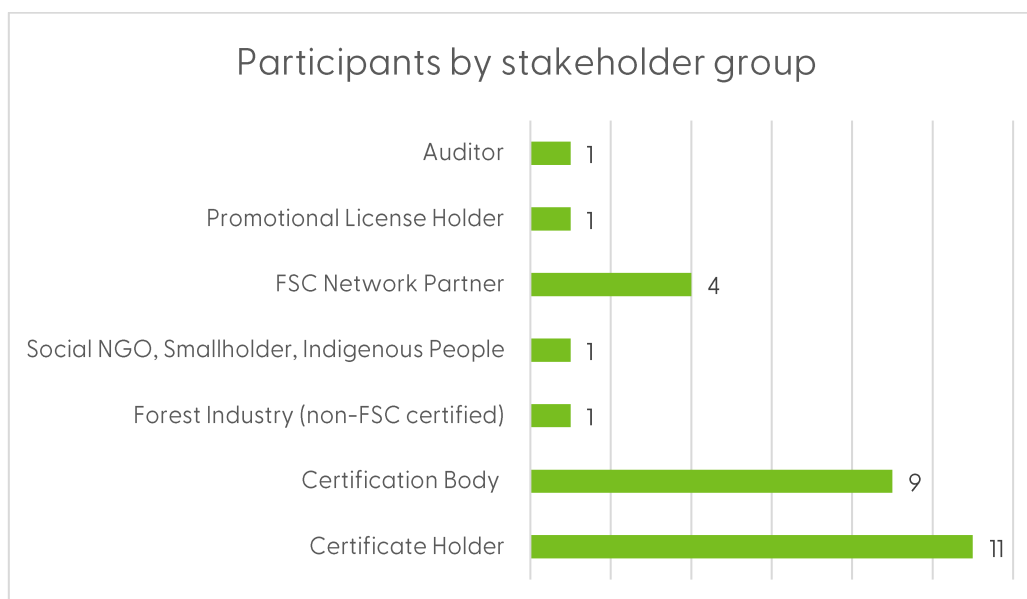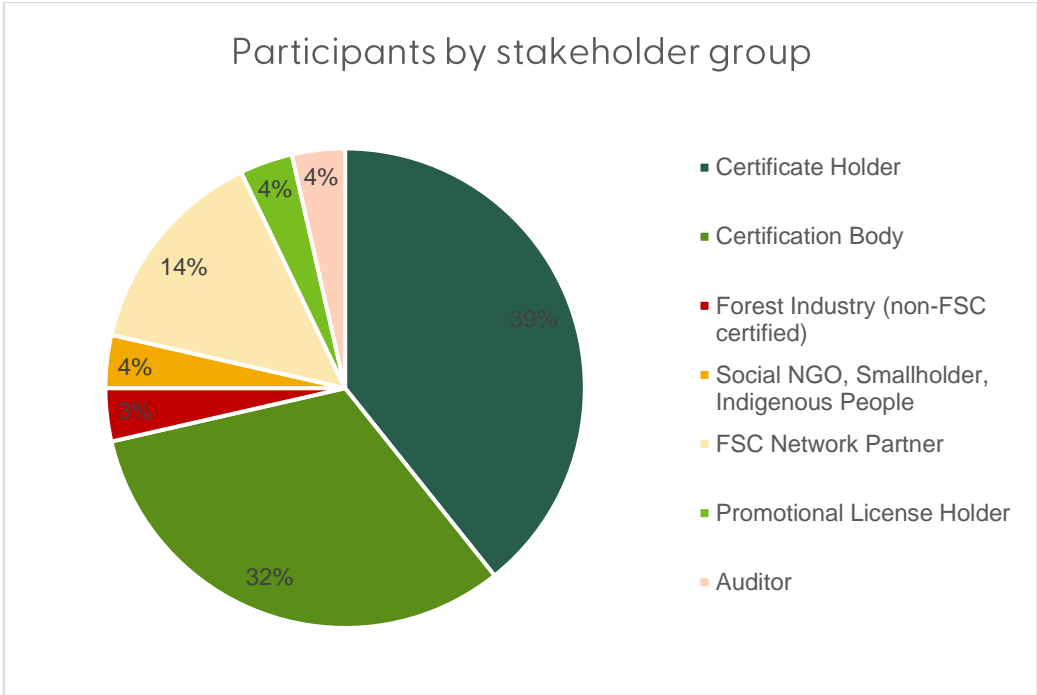

Figure 2

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Figure 3

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METHODOLOGY

The process implemented to evaluate the feedback obtained in the consultation included qualitative and quantitative analysis. The consultation contained a combination of closed and open questions which covered the proposed topics to be revised in the drafting phase by the working group. This report presents the results organized by stakeholder category, based on the background information provided by each respondent. For transparency, the comments added as additional information and the responses to open questions are included in full in Annex A of the present report.

Quantitative analysis

The consultation included two types of closed questions: 1) perception questions regarding existing requirements and proposals for new ones, with answer options "Agree", "Disagree" or "Neither agree nor disagree", and 2) multiple choice questions to identify one or various elements of a specific issue, or to provide information about their organization.

The quantitative analysis refers to said closed questions and the respective answer percentages. The results are presented in figures 4-19. Foremost, the analysis focuses on questions where a negative perception can be found on more than 50% of the responses.

Qualitative analysis

Most of the perception-type closed questions were accompanied by an open follow-up question for participants to explain their answers. In addition, the consultation included several open questions asking for specific feedback about priority topics for the revision.

For both types of questions, the present report analyses the feedback received, and provides responses and clarifications for some participants, depending on the frequency of similar answers collected.

SUMMARY OF COMMENTS AND FSC FEEDBACK

Below is a summary of key topics on which stakeholders provided feedback. Each key topic contains the question posted during public consultation, quantitative results, and qualitative results.

Topic 1 – Labelling with FSC

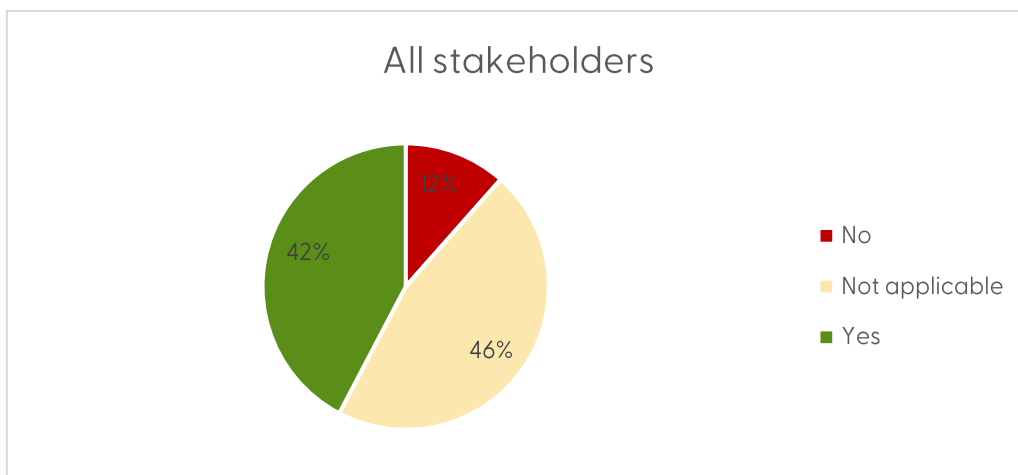### Question 1: Are you currently using the FSC label on your FSC-certified products?
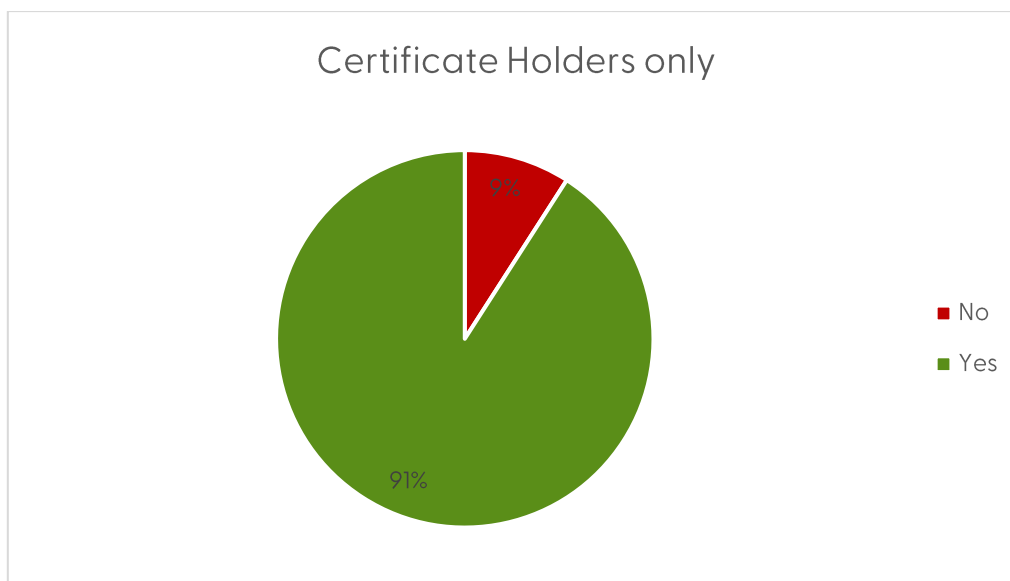

Figure 4

Figure 5

Question 2: Are there any specific requirements in FSC-STD-50-001 that make it challenging to use the FSC label?
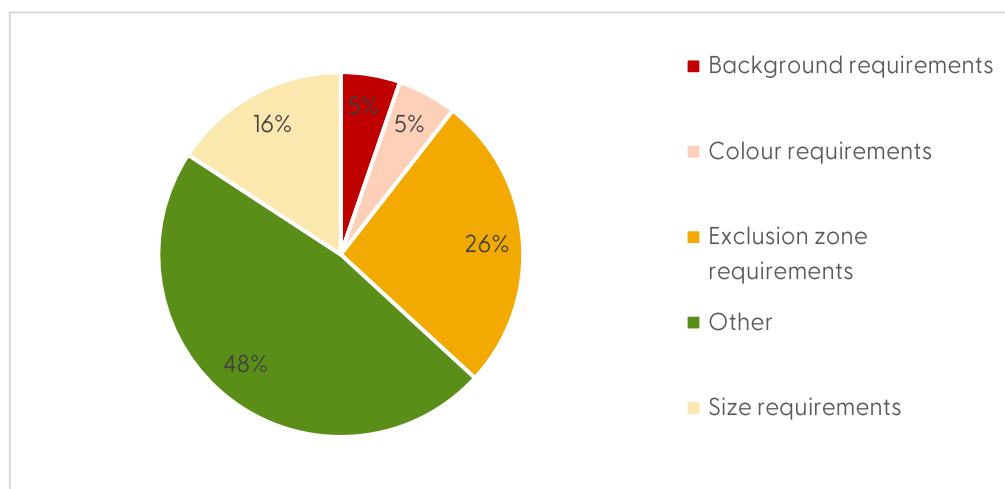

Figure 6

Note: The predefined answer options provided above were based on the stakeholder feedback obtained in the webinars and workshop organised by FSC in the conceptual phase.

In addition to the predefined answers from the multiple-choice question, participants highlighted the following requirements as an obstacle to labelling with FSC:

- Constant change of requirements for using the trademarks;
- Labelling agreement requirements;
- Product type requirements do not cover all possible challenging scenarios;
- Restriction to label semi-finished products;
- For digital environments size is not defined in pixels.

During the drafting phase, together with the working group, FSC will address each of the challenges described by certificate holders here, to enable the labelling of FSC-certified products.

Question 3: Do you agree that current elements of the FSC label (FSC logo, FSC website address, label title, product type, FSC licence code) are all relevant and valuable information to convey to consumers?
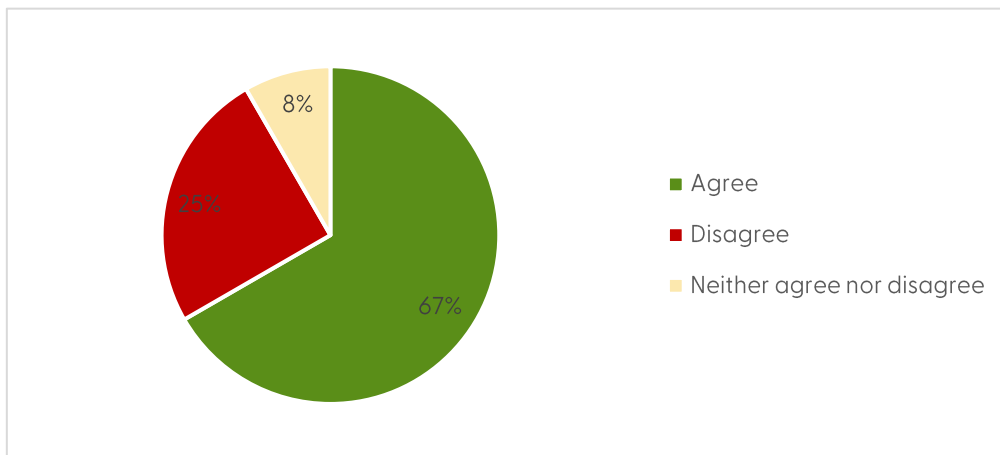

Figure 7

While most of the participants agree with the current elements of the FSC label, 25% disagree and cite reasons connected to consumers, such as:

- FSC website is redundant, as consumers can easily find the site on their own through online search engines;
- Product type is not clear for consumers;
- FSC license code is not known by consumers;
- Label type is not needed, as external stakeholders barely understand the meaning of the 100% and MIX% labels.

On the other hand, respondents have also highlighted the importance of the following elements:

- Product type, to understand the component that is being certified;
- FSC license code, as this is a first-level protection for FSC to easily verify the commercial origin of a certified product.

The working group will assess the relevance of the label elements, taking into consideration the limited space available for sustainability labels on packaging, legal/regulatory requirements as well as the impact of adding or removing label elements for the certificate holders.

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Question 4: The current FSC label contains compulsory and non-compulsory elements. Do you agree with the current classification of compulsory/non-compulsory elements?
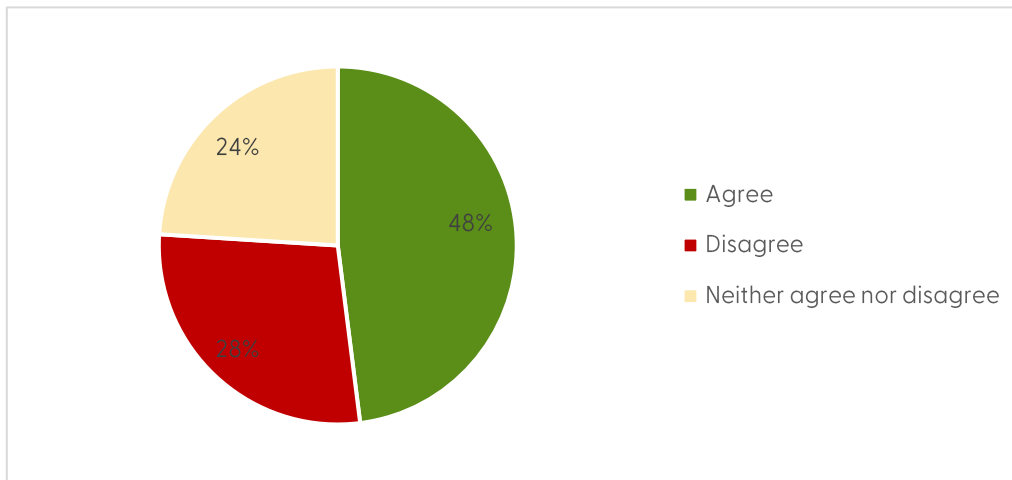

Figure 8

Similar to the previous question, the majority of participants agree with the current structure of compulsory and non-compulsory elements, and similarly, there is a significant concern about the obligatory elements of the label. For some elements, certain stakeholders consider that they should not be compulsory:

- Only the FSC logo and the FSC license code should be mandatory, and the rest non-compulsory to streamline the labels;
- The label title does not provide the expected value and, as such, should be optional.

For other elements, participants consider that they should be compulsory without exceptions:

- Product type should always be included in the label;
- Moebius loop is critical for the RECYCLED label to show the percentage of recycled material.

FSC will present these suggestions to the working group. Together with FSC, the working group will define the elements that must be included in the FSC label

Question 5: Would you propose the inclusion of additional label elements to improve the informational value of the FSC label?

Participants -in particular, certificate holders- are reluctant to add elements to the FSC label and highlight potential space issues on products.

Nevertheless, other stakeholder groups suggested the possibility of adding certain features to the label:

- Adding two or more product types for products with different forest-based materials.
- Adding a set description of FSC.
- Adding the country of origin of the forest-based materials.

We will raise these suggestions during the drafting phase, remarking that, as learned during the conceptual phase events, certificate holders have reasonable concerns about changes to the FSC label.

As a final note, we see this revision process as an opportunity to verify compliance of the FSC label with the current anti green-washing legal requirements, which may influence the discussion on this topic.

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Question 6: Do you agree that FSC should explore new technological solutions to create alternative label options that help consumers access more information about the FSC-certified products and the certification scheme?
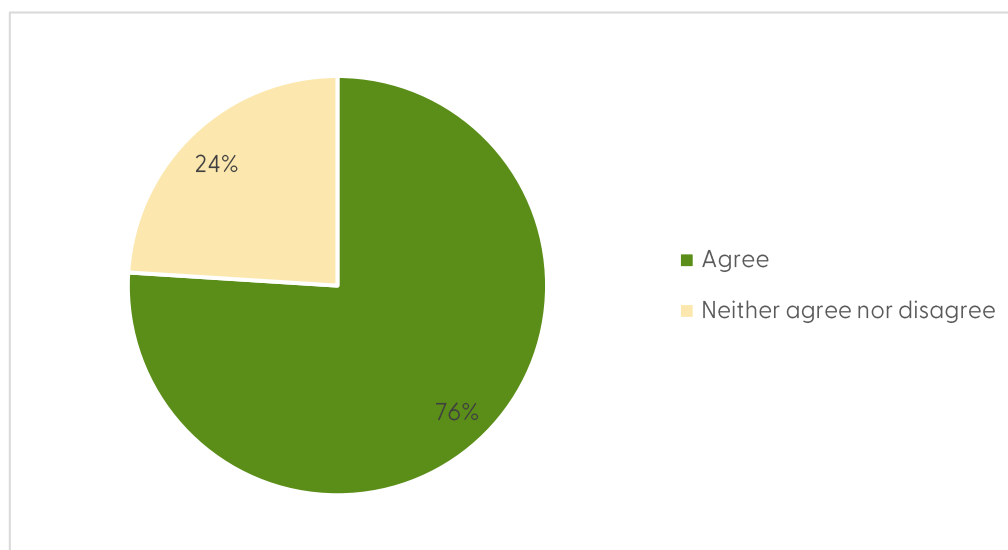
Figure 9

Stakeholders support the concept of an alternative label that can convey additional information to consumers, such as QR codes. In particular, the following feedback was received:

- Reducing the elements to only the FSC logo, the initials and QR code would be a great simplification.
- The current FSC label does not provide enough transparency, such as the origin of the forest-based materials or the tree species. This information could be displayed with the help of QR codes.
- While welcoming such initiative, these alternatives should be optional to the current label, which should remain available.
- Companies are developing digital products passports. FSC could develop and support something similar.
- The compulsory elements should remain mandatory even if a QR code is available.
- Difficult to implement with group certification members that do not have their individual FSC license code.
- Upcoming legislation may require certificate holders to provide additional information. QR codes can help to communicate the required information.

All proposed options will be presented to the working group for discussion and will consider the costs and benefits of implementing said solutions.

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Question 7: Are you already using such technologies for your products?
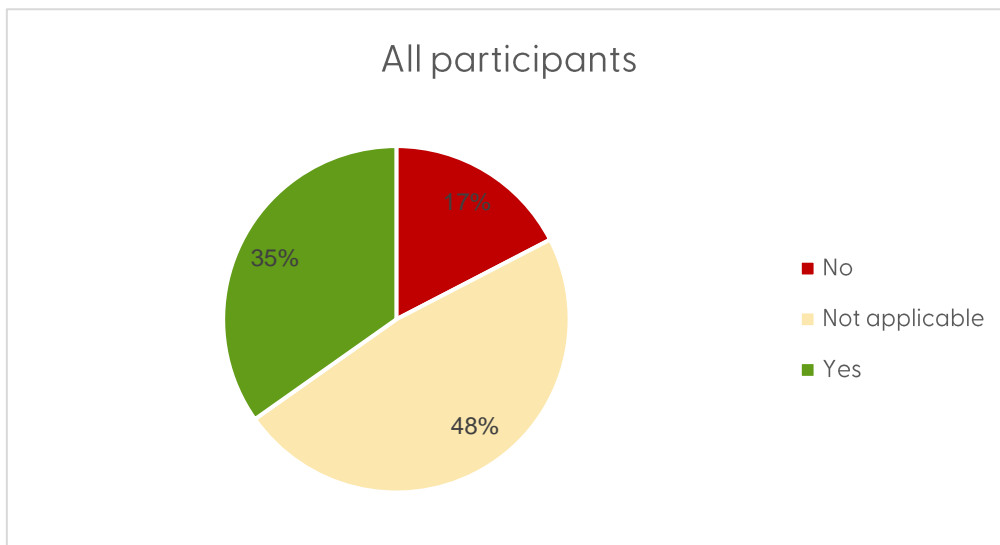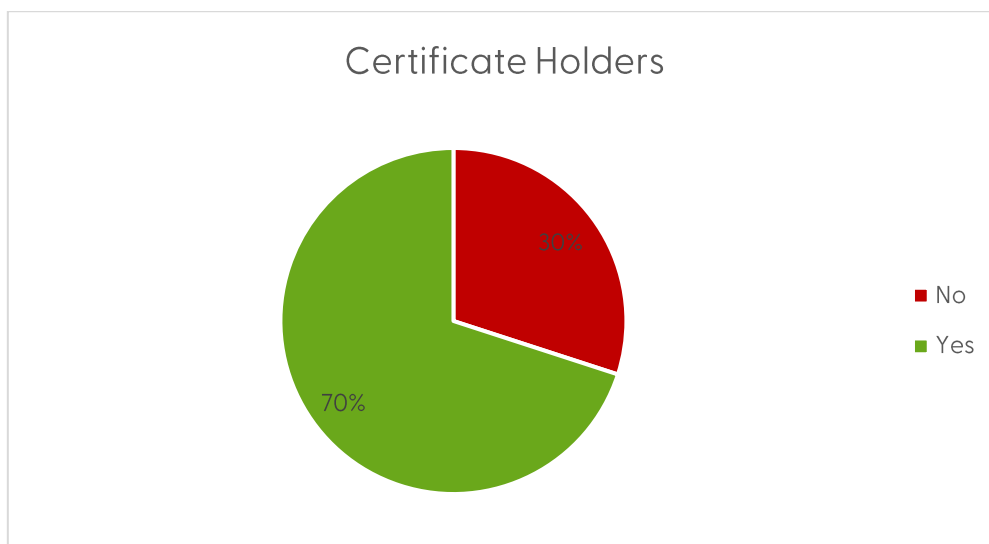

Figure 10

Figure 11

Certificate Holders participating clarified that some of the technologies that they have been using are:

- Linear barcodes and QR codes;
- QR codes to link brand websites;
- Datamatrix codes.

FSC will consider these options with the working group during the drafting phase.

Question 8: What is your position on the current restriction on using the FSC label on a product alongside marks of other forest certification schemes?
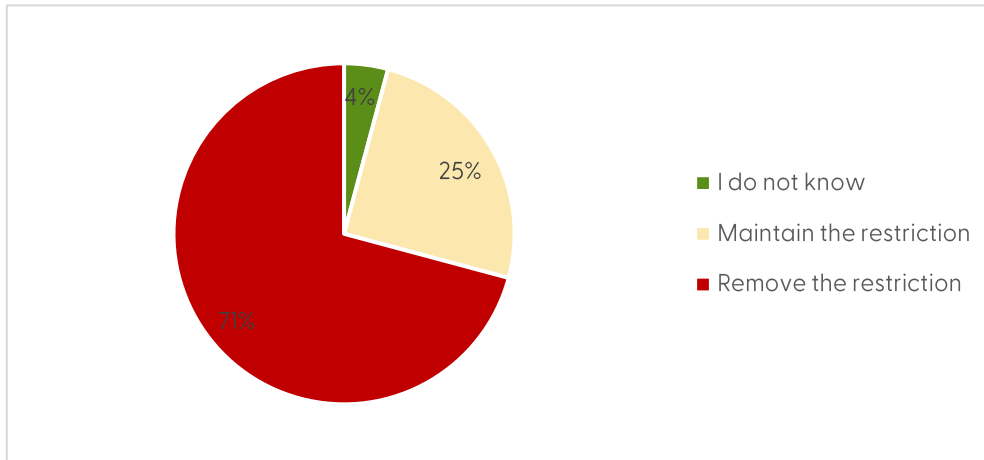

Figure 12

Participants showed support for a potential removal of the restriction in clause 4.3 of FSC-STD-50-001 V2-1, however they have diverse opinions regarding the practicalities. Some favour complete removal, others prefer maintaining some restrictions:

- The current restriction adds complexity to scenarios in which the outside packaging is certified, but the inside packaging or products are not FSC-certified and have other forestry certification scheme labels.
- It should be permitted to use both labels if the product is certified against FSC and other forestry certification schemes.
- Dual labeling of the same product should be avoided.
- Allowing the use of both labels can mislead consumers to think that both packaging and product are certified when only one of them is.
- Restriction should be maintained regarding other forestry certification schemes.
- The restriction should be maintained, but flexibility should be allowed under specific circumstances, such as packaging and products being certified by a different certification scheme.

FSC expects to find a solution during the drafting phase that considers the multiple views and balances the interests of all stakeholders.

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Topic 2 – Promoting with FSC

Question 9: Do you use the FSC trademarks to promote your FSC-certified products and/or your FSC certification?
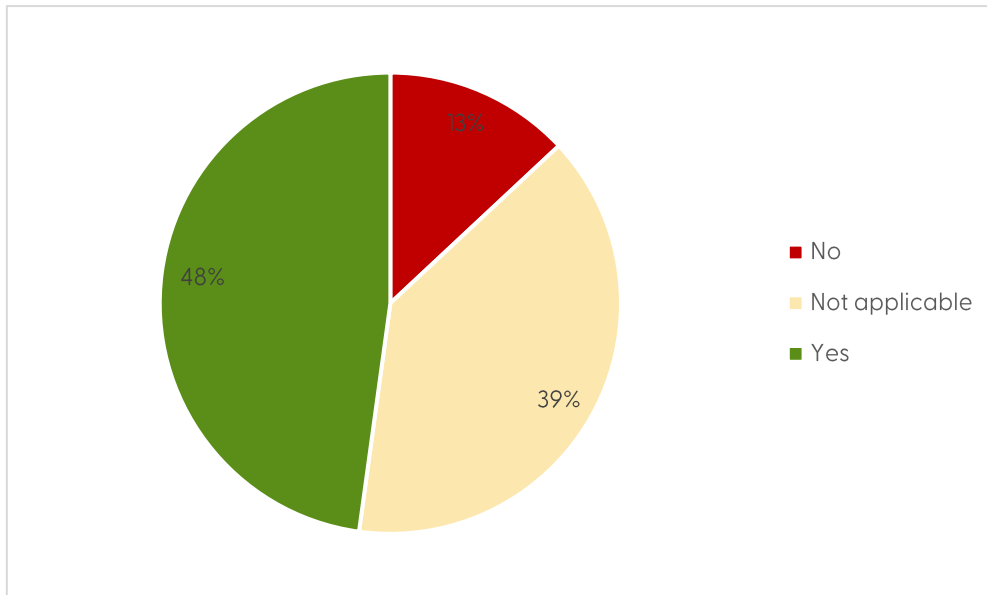
Figure 13

Question 10: Are there any requirements that make it challenging for you to use the FSC trademarks to promote your products?
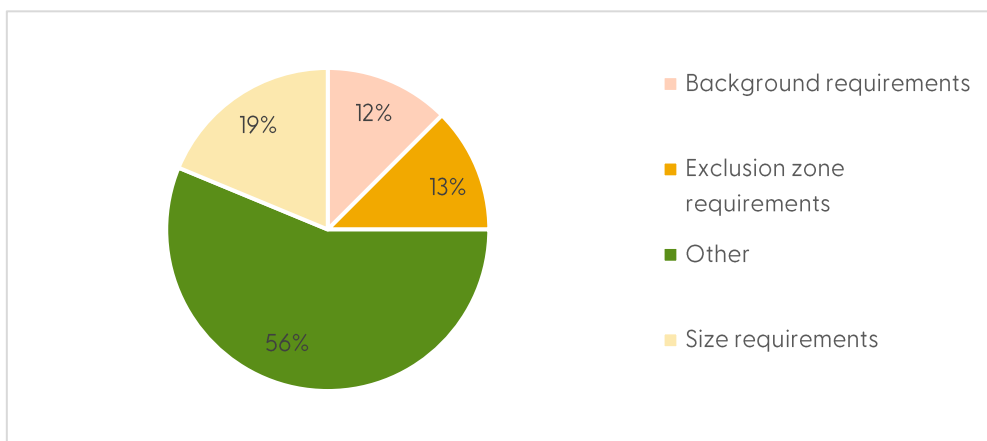
Figure 14

Participants highlighted the following requirements as an obstacle to using the FSC trademarks to promote products:

- Requirement to receive trademark approval;
- Describing FSC-certified products on online marketplaces and "passing on" the description may result in infringement accusations;
- Comparing FSC trademark sizes with those of other forestry certification scheme marks;
- Size requirements are restrictive;
- The restriction to promote certification status on invoices;
- Size requirements should be defined in both milimetres and pixels.

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FSC identified the topic of restrictive size requirements and their lack of suitability for digital uses as a priority for remediation in this revision. FSC and the working group will assess requirements for promotional uses on online marketplaces as well as all the other challenges listed by stakeholders here, to enable the promotion of FSC-certified products.

Question 11: Do you agree that current elements in the FSC promotional panel (FSC logo, FSC website address, and FSC licence code) are all relevant and valuable elements to use when promoting your FSC-certified products to consumers?

Figure 15

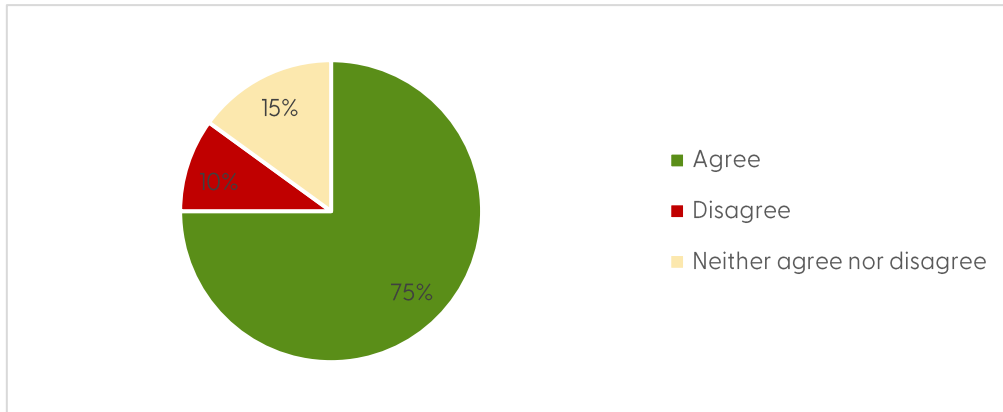**Question 12: The current FSC promotional panel contains compulsory and non-compulsory elements. Do you agree with the current classification of compulsory/non-compulsory?**

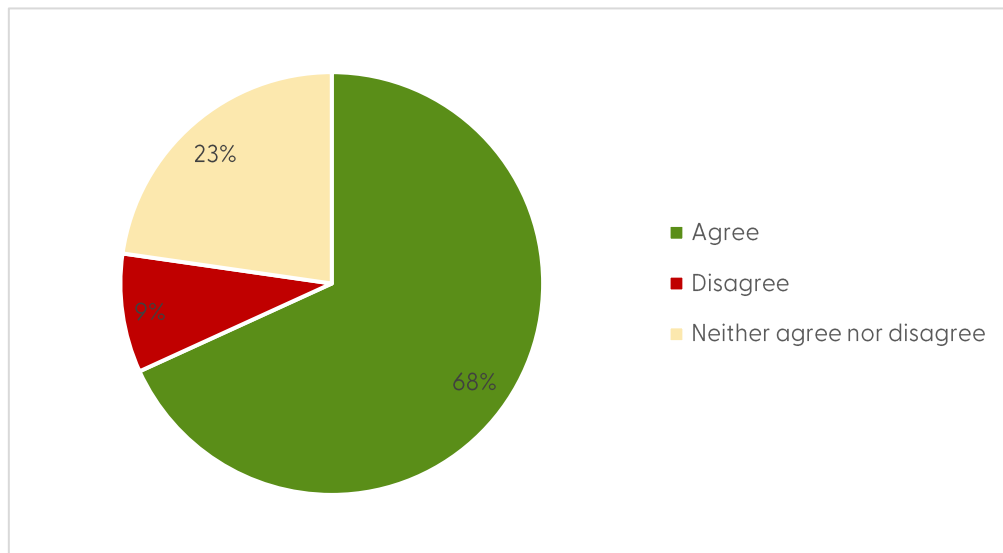

Figure 16

Participants highlighted the following aspects:

- Licence codes do not mean much to consumers;
- Checkmark-and-tree logo and FSC licence code are enough;
- Reduce the compulsory elements;
- Website address should be non-compulsory;

- Website address should be mandatory.

FSC will present all proposed options to the working group for discussion. We note the diverse and sometimes contradictory opinions of consulted stakeholders and aim to balance them with further considerations such as requirements arising from new legislation on environmental claims.

Question 13: There are currently restrictions on using the FSC logo and the 'Forests For All Forever' marks on business cards for promotion (clause 7.3). What is your position on this restriction?

24%

76%

■ Maintain the restriction

■ Remove the restriction
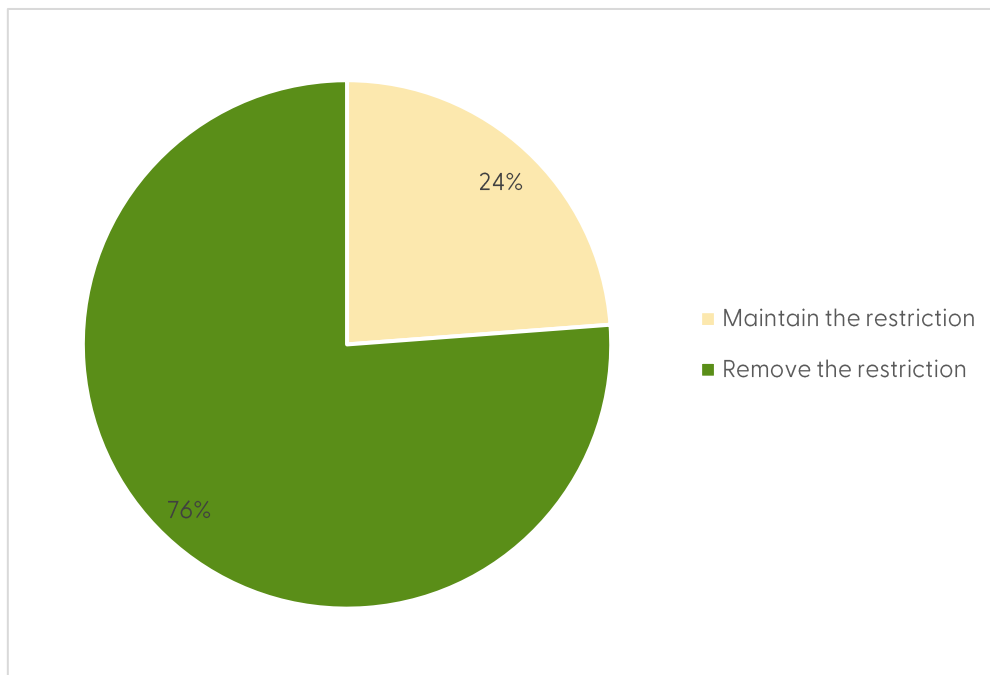
Figure 17

Participants provided additional context in a follow-up question:

- Business cards are not relevant in the current market and should not be regulated in the standard;
- It should be permitted to use the FSC trademarks in business cards as long as the FSC license code is also visible;
- There is no rationale for restricting the use of FSC trademarks on a specific promotional material while allowing it on other paper-based materials.

The working group will assess the integrity risk of removing this restriction and whether other safeguards should replace a full restriction of such usage.

Question 14: Are you using the FSC trademarks to promote your products on eCommerce marketplaces?
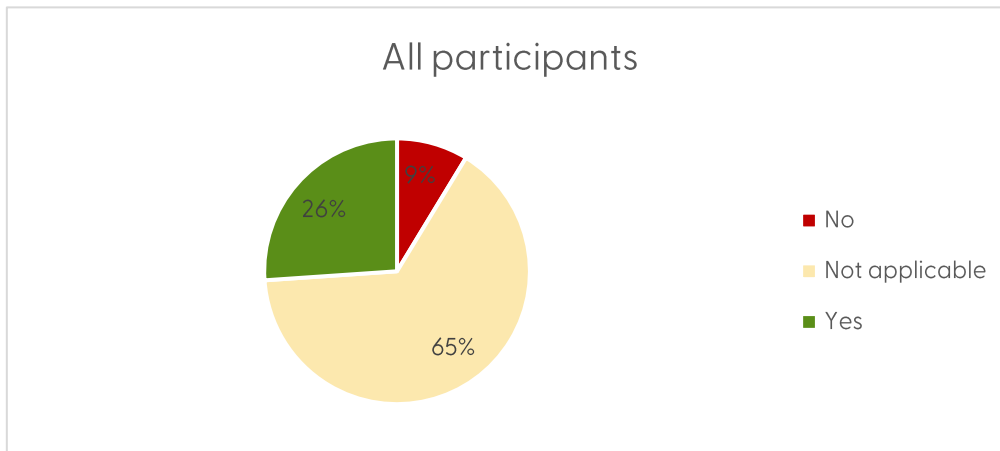
Figure 18
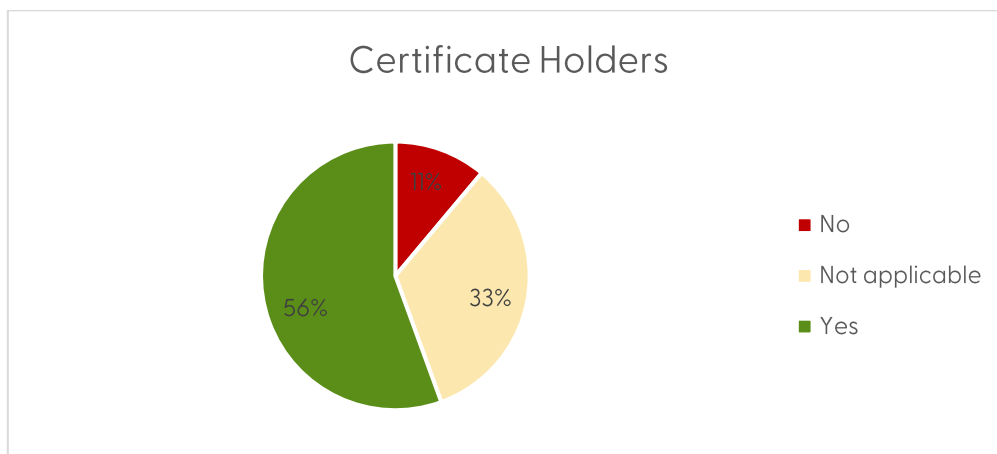
Figure 19

Question15: What elements would you consider compulsory for FSC trademark use on eCommerce listings of FSC-certified products?

- Checkmark-and-tree logo and FSC licence code
- No additional requirements, and streamline the existing ones for promotion;
- FSC licence code;
- Separate requirements between certificate holders selling on online markeplaces and certificate holders that hosts their own marketplace;
- Requirements to "pass on" information on product description featuring the FSC trademarks and that may be re-used by third-parties;
- Registration symbol after FSC unless not allowed by platform;
- License code and website fsc.org.

FSC will present all proposed options to the working group for discussion. We note the diverse and sometimes contradictory opinions of consulted stakeholders and aim to balance them with further considerations such as requirements arising from new legislation on environmental claims and restrictions relevant to ecommerce platforms.

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Question 16: What elements do you consider compulsory for using FSC Trademarks on social media posts of FSC-certified products?

- Checkmark-and-tree logo exclusively;
- FSC logo and link to fsc.org;
- No additional requirements, keep the existing ones for promotion;
- FSC license code;
- Registration symbol;
- Link to a website featuring their FSC promotional panel and FSC license code;
- Registration symbol and FSC license code;
- License code and website fsc.org.

FSC will present all proposed options to the working group for discussion. FSC notes the diverse opinions of consulted stakeholders and aims to balance them with further considerations such as requirements arising from new legislation on environmental claims and restrictions of social media platforms.

Question 17: Do you agree that FSC should stop requiring the use of the trademark registration symbol (®, ™) on online marketplaces or social media platforms that do not support their use?
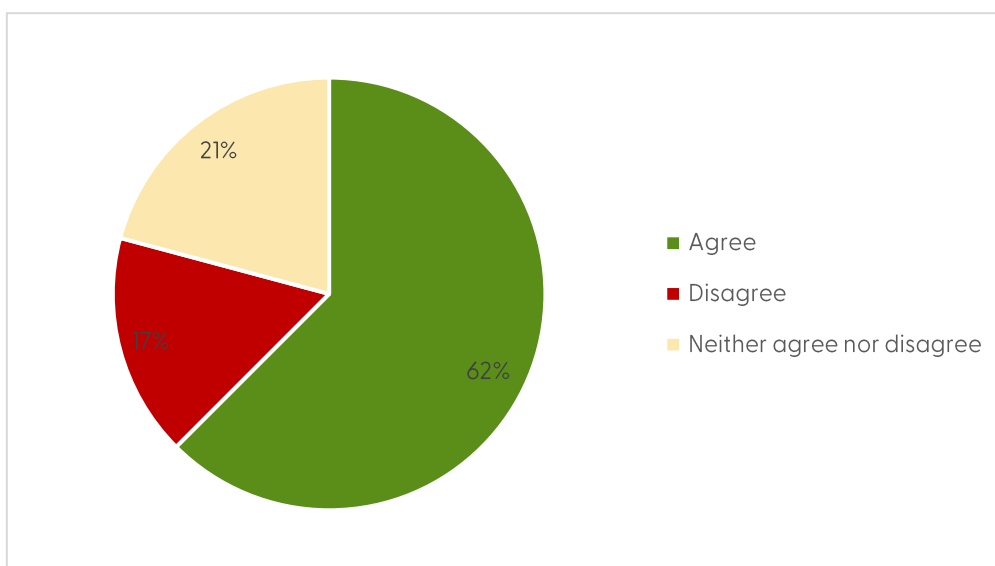
Figure 20

Participants highlighted the following aspects:

- E-commerce can target multiple countries and as such both symbols may be correct;
- Using the registered symbol ® should be default;
- Only stop the requirement if the use of registration symbols are not supported.

Trademark registration symbols play an important role in the protection of FSC's trademark portfolio. However, the current requirements which guide their selection based on country of distribution do not account for the complexity of digital mediums, causing uncertainty and inconsistent interpretations. FSC will assess the legal risk to our trademark portfolio and propose feasible options to the working group.

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Topic 3 – General Feedback

Question 18: Would you like to provide any other feedback?

- Ease the requirements for using FSC trademarks on e-commerce;
- Remove approval requirement;
- Clarify product type requirements when components are manufactured by two different certified organizations;
- Clarify graphic requirements;
- Clarify rules on "sharing" and "re-sharing" posts on social media;
- Shorten the length of the standard;
- Ease promotional use of the FSC trademarks;
- Introduce QR codes;
- Allow labeling only when a minimal percentage of FSC-certified material is contained in the finished product;
- Consider extended transition periods for certificate holders already using the FSC trademarks.

The additional feedback provided by participants reinforces the need for simplification and streamlining of the standard. It also raises some additional considerations around clarity of labelling and better supporting consumer understanding.

Topic 1 Question 2: Are there any specific requirements in FSC-STD-50-001 that make it challenging to use the FSC label?

Certificate Holder

Background requirements

While getting the TUMS approval, a 'see through' background was approved. However the manual does not specify this. Neither does the portal export the right format for a logo without background. The logo generator portal also didn't allow to remove all optional elements like the website or maybe it was the label text, if I remember correctly, which was frustrating. FSC advised we edit the logo ourselves, which should not be recommended.

Exclusion zone requirements

Small packaging has challenges with the free space requirements, other 3rd parties label making it challenging

Other

Label title Packaging, customers do not understand why because we are producing combined paper products

Requirements for labelling agreements have to be adjusted. 4.8 a is not usefull and not necessary.

Do not use because of the changing standards over the years.

Size requirements

confusion between recommended minimum size and minimum size amongst group members

Empresa grafica de packaging que debe colocar la etiqueta en artes (no propios) que no se peuden modificar en cuanto a imagenes y textos. Solo se dicpone de lugares libres en aletas laterales (internas, pero visibles por el usuario final al abrir el envase) y de tamaños en algunos casos mu y reducidos.

Certification Body

Exclusion zone requirements

No clear rules on what is still acceptable "distortion" in exclusion zone/background in the exclusion zone.

Requisitos de zona de exclusão, pois há materiais que é melhor não haver borda e possuir selo maior do que ter borda e selo menor. Plano de fundo também é desafiador, pois há situações que o selo fica visível mesmo num fundo estampado e sem borda.

Other

Challenges when FSC material is packaged in non-FSC material and both are of the same type.

En tamaños pequeños de logos, las impresiones pueden ser dificultosas en cuanto a su legibilidad, en especial el TM o R.

It is not allowed to label "semi-finished" products, but when components are manufactured by different companies, assembled and finilized, they cannot put FSC labels on products. This kind of specialization in manufacturing products is common in some industries. The definition of "semi-finished" products should be clarified, or this requirement should be reconsidered and revised. A similar problem occurs when there are products which can be finished products and also which can be assembled with other products.

Forest Industry (non-FSC certified)

Other

All of the above

FSC Network Partner

Colour requirements

The colours proposed by FSC are not adapted to the codes of the luxury sector, which use silver and gold for example. It is unclear in the standard if those colours can be used (clause 8.3). Either we should allow more flexibility, or make it very clear in our standard.

Other

+++While we do not use labels ourselves, we guide COC Certificate Holders and Promotional License Holders (concerning their COC CHs) about their use. Based on feedback from our stakeholders, there must be more distinction on when regular sized labels versus mini labels can be used. Similarly, it is not clear which elements are compulsory for mini labels. Overall, many CHs and PLHs have requested more examples of approved trademark uses. Also, we have gotten more requests about flexibility with the background requirements, especially when dealing with a color gradient.

Size requirements in mm needs updating to digital environments (pixel). Background requirement - provide transparent variants of the label in the Trademark portal.

We have received a number of enquiries which highlight some confusion around the required exclusion zone (8.10, 10 (g) FSC-STD-50-001 V2-1) and what constitutes violation of this zone (i.e. text, pattern, background colour).

Topic 1 Question 3: Do you agree that current elements of the FSC label (FSC logo, FSC website address, label title, product type, FSC licence code) are all relevant and valuable information to convey to consumers?

Certificate Holder

Agree

The FSC Logo needs to be promoted at a much larger scale.

Disagree

Checkmark-and-tree Logo with license number should be enough as minimum, even for on-product labelling. One FSC-label fits all!

License code and title are not really relevant to consumers, they don't know what they mean

The product type and statement is errelevant to customers and only because of member requests. If we are goign to be one FSC there should ultimately be just one label in the marketplace. All other label forms should be removed.

Website is not relevant. Everyone's first instinct if they wanted to find out more would be to google.

Neither agree nor disagree

Son demasiados los elementos actuales obligatorios, Dejaria solo logotipo y codigo de licencia.

Certification Body

Disagree

Los clientes finales no entienden la diferencia entre 100% y MIX, yo creo complica las declaraciones y no aporta el valor esperado.

Website not so relevant.

FSC Network Partner

Agree

+++We do not believe most consumers understand the meaning of the different elements of the label. A common question we are asked is if 100% means 100% of the product is certified and if MIX means that only a percentage of the product is certified (i.e., it is a mixture of certified and noncertified material). Also, we view the product type as important as the logo, website, and license code.

Neither agree nor disagree

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100%, Mix orRecycled is an important piece of information, but feedbacks from "non-FSC" circles show that this is not understood, and Mix raises doubts in people's minds (e.g. oh yes it's FSC, but it's mixed, so we don't really know what's in it). I think we should at least have a discussion about its usefulness and the advantages/risks of removing it (more risks in our opinion). The licence number is never used by end users, but it is reassuring (proof of credibility). It's also a first level of protection for us, a first level of easy verification.

Topic 1 Question 4: The current FSC label contains compulsory and non-compulsory elements. Do you agree with the current classification of compulsory/non-compulsory elements?

Certificate Holder

Agree

we have printing agreements with our FSC suppliers who do the manufacturing so it is always our licence code on our items, but for some certificate holders the fact that their supplier's code is on there might be difficult or even reveal commercially sensiitve information to competitors.

Disagree

Checkmark-and-tree Logo with license number should be enough as minimum, even for on-product labelling. One FSC-label fits all!

more compulsory elements would be helpful

The non compulsory elements should just be removed to streamline all labels.

Neither agree nor disagree

Son demasiados los elementos actuales obligatorios, Dejaria solo logotipo y codigo de licencia.

The more we can take off the better

Certification Body

Disagree

El label title debería ser opcional visto que no aporta el valor esperado.

Forest Industry (non-FSC certified)

Disagree

What circumstances would not include the Product Type? There is a need to expand the range of options for product type however.

FSC Network Partner

Agree

Might be useful to provide further clarification of when the Product Type is required?

Disagree

+++One issue we have seen repeatedly is with the product type being optionally compulsory. Typically, when we see it removed, we think the Certificate Holder made a mistake rather than all elements (3.6) are certified. We highly recommend a different solution to cover having multiple elements (product, packaging, secondary packaging, etc.) certified. We are finding that it is getting more confusing for our stakeholders, and consumers.

Product type should always be a compulsory element. It would meet upcoming legislation and help ensuring specific information that prevents misleading promotion.

Neither agree nor disagree

Should the Moebius loop be compulsory ? An increasing number of brands and retailers want to communicate on a rate of recycled material. On the other hand, to be honest the reliability of this information is technically very questionnable

Topic 1 Question 6: New technologies now make it easier to show important information to consumers without needing more space for the FSC label. Some examples are lineal barcodes, QR codes, and mobile applications, all of which show consumers more about the sustainability credentials of the products they buy. Do you agree that FSC should explore new technological solutions to create alternative label options that help consumers access more information about the FSC-certified products and the certification scheme?

Certificate Holder

Agree

Checkmark tree logo, FSC initial, and a QR code would be great simplification

Currently the FSC label does not provide transparency (origin, tree species, ...).

the FSC logo is very valuable so that should remain - maybe with a 'qr artwork' that it's a logo and also a QR at the same time. Many companies will need to develop product digital passports so FSC would do well to develop something like this. However, for someone to scan a QR code they have to be truly interested in the subject and many are not so for purchasing decisions in store people would still like to see the basics namely FSC logo, label title, and product type.

Neither agree nor disagree

Desconozco si la aplicacion de estos elementos podria ser autorizada por los clientes que incluyen estas tecnoclogias en sus artes; pues podrian interferir en la lectura de los mismos. Por otro lado la nueva informacion deberia reemplazar a la actual...no obligar a sumar mas requisitos obligatorios.

Only if they are optional and separate from the logo so that there is no confusion that the logo is one logo that supports responsible forest management. Learn more here beside the logo is fine. Anything inside the logo is a bad idea and a waste of time.

Forest Industry (non-FSC certified)

Agree

If the QR code were to link directly to the company then yes. However, Group CoCs companies do not have their own individual TL and therefore this would be useless.

FSC Network Partner

Agree

+++We have had requests from stakeholders who have gone to QR codes and/or other forms of digital labeling requesting FSC to do the same.

We believe it is very important to uphold our credibility and to protect our message that consumers who wish to do so are able to find out more about FSC. We support all initiatives that allow consumers to get access to more informations. In addition to that, Perhaps it is also worth pointing out that brands and retailers have to include more and more mandatory information on their packaging, leaving less and less space for labels. We need to think about technological developments that will give consumers more information without creating additional constraints for brands.

Neither agree nor disagree

Additional information is important to meet upcoming legislation! It might be relevant for FSC to consider including a QR-code to the label if the code ensures easy access for consumers to more information about the different FSC label claims (100%, Mix, Recycled) - website address can then be left out from the label. However, if the meaning is to ensure specific information about the product itself (full composition etc.), then I'm not sure whether is meaningful that FSC provides the information through a QR-code - a lineal barcode would possible contain information from different schemes that are relevant to the product.

Topic 1 Question 7: Are you already using such technologies for your products?

Certificate Holder
No
No, we are not using yet these type of technologies on our products. We're going to join a pilot program as a provider of Amazon's Climate Pledge Friendly products, to test the Digital ID.
Yes
Because we already do this sometimes it is not a need to have FSC do this.
Codigos QR y datamatrix; pero son propios de los diseños recibidos; no pueden alterarse ni modificarse.
Linear barcodes and QR codes
see our collection with QR codes here: https://wear-iqoniq.com/ . We hope to be able to integrate the FSC EUDR-compliant data with our passports.
We use QR codes to link to brand websites

FSC Network Partner
Yes
+++As mentioned above we have had requests for companies already doing this to want to extend it to FSC labels.

Topic 1 Question 8: Current FSC trademark rules forbid the use of the FSC label with marks of other forestry certification schemes. This may pose an issue in cases where the packaging is certified by a forest certification scheme and the product inside is certified by FSC or vice versa. What is your position on the current restriction on using the FSC label on a product alongside marks of other forest certification schemes?

Certificate Holder
Remove the restriction
en nuestro caso fabricamos envases secundarios en cartulina, pero desconocemos si en el interior de los mismos se incluyen otros insumos con certificacion forestal.
I think the FSC label is clear enough about which part of the product it relates to .
Should also remove this restriction in invoices and delivery documents for CoC Standard
This just fosters bad communications between two relevant standards. there is no need to maintain this requirement.
We are a FSC certificate holder, but also we are a PEFC certificate holder. If we have a carton box FSC certified, we can't use it to pack a PEFC article, so we can't identify our packaging as FSC certified or we have to use two identical boxes: one FSC certified and the other one with no forest management certificate...

We may potentially have packaging and product where one contains FSC and the other PEFC coc paper

Certification Body

Remove the restriction

As long as the material is certified against both schemes both labels should be possible to use.

Eliminar la restricción para el ejemplo planteado. Mantenerlo para que no se pueda etiquetar un mismo productos con las dos etiquetas.

If it is clear what the each mark refers to, it would encourage CHs to produce and distribute more labeled products in the market.

It's often hard to explain to our clients why other labels are not permitted.

Forest Industry (non-FSC certified)

Remove the restriction

Only for those circumstances where it is clear what is being identified as FSC vs, other cert schemes. As in your example, where the product packaging is PEFC or SFI but the product itself is FSC

FSC Network Partner

Maintain the restriction

FSC is well-known and recognised by consumers. If the product is certified by another forestry certification scheme and the packaging FSC-certified - we risk that consumers only see the FSC-label which might affect their purchase decision (thinking the product is FSC-certified) - even if the product type is present on the label.

When it comes to "forest certification" this restriction should be maintained

Remove the restriction

+++Our stakeholders have asked us to make things easier for them. The more they can use the FSC label the better it is for them and FSC. Many of our CHs are certified to multiple forest certification schemes, and it is difficult for them to allow trademarks for one scheme and not use them for FSC. If it is clear what the label refers to, it should be allowed.

The current requirements can cause problems if a product is FSC certified and the packaging certified under another scheme (or the other way around) and both product and packaging labels would be on the packaging. There may be benefits (or no disadvantages) to being used alongside provenance labels and it is not always clear whether these are considered to be other forest certification schemes

Promotional License Holder

Maintain the restriction

Maintain, but provide flexibility for the scenario outlined in the question where the product may be certified separately form the packaging.

Topic 2 Question 10: Are there any requirements that make it challenging for you to use the FSC trademarks to promote your products?

Certificate Holder

Exclusion zone requirements

Exclusion zone requirements can make label placement difficult

Other

'Forests For All Forever' marks should be in the label generator, with license code.

FOCUSED CONSULTATION REPORT
Revision of FSC-STD-50-001 - Conceptual phase

La obligatoriedad de tener que enviar a aprobar cada promocion o uso que se quiera incluir para dar a conocer la marca FSC

Some elements are not consumer friendly, license code doesn't mean much to consumers

There are no issues with this label.

There is a very big issue in our industry (promotional goods, b2b) and i'm sure this will also be the case for e-commerce host sites like Bol.com and Amazon, and any B2B companies. The problem is that our customers 'copy' our product descriptions and communication 1:1. The restrictions FSC has put regarding use of the trademark means that as soon as we make FSC claims, our unlicenced customers - who never take the item into their posession, they just sell it on - get an angry letter from FSC accusing them of trademark infringement. We have discussed this with FSC and landed on the 'fair use' principle meaning we don't include FSC trademarks in product names anymore, but only in product descriptions However, customers STILL get letters from FSC which is frustrating as this fair use practice doesn't seem to be common knowledge. ANyway, the point is, is that we are certified but we have now lost the competitie advantage of our FSC items as we are no longer able to promote these items. This makes FSC items no longer distinguishable from non-certified items, and they just look like the more expensive option for no reason. Customers reselling our FSC items face the same issue as they can't claim it.

Certification Body

Other

Some CHs wish to use the promotional panel on their business cards because it is a good PR for the company.

Size requirements

El hecho de tener que comparar los tamaños con otras etiquetas de certificación forestal.

Forest Industry (non-FSC certified)

Other

All of the above

FSC Network Partner

Background requirements

+++While we do not use labels ourselves, we guide COC Certificate Holders and Promotional License Holders (concerning their COC CHs) about their use. Our biggest feedback is the guides (the Standard and guidance document) need more examples of different approved trademark uses. Also, the way the standard is currently written and organized causes confusion according to some of our stakeholders. For example, clause 4.5 causes lots of confusion because of where it is in the Standard.

Other

Size requirements: include both mm and pixl. Background: Include possibility to create transparent and semi-transparent labels in the label-generator

As Network Partner we receive many enquiries from CH seeking guidance and clarification around the use of the FSC trademarks in promotion. Clarification and discussion around whether the use of the FSC trademarks on invoices should constitute promotional use would be beneficial. Also, updating a number of clauses to apply more easily in digital/online promotion would be advantageous.

Promotional License Holder

Other

Not promotional label related, but the manual approval process for promotional license holders limits our ability to use the label in promotional materials. It would be great to find a way to streamline and simplify the process.

Topic 2 Question 12: The current FSC promotional panel contains compulsory and non-compulsory elements. Do you agree with the current classification of compulsory/ non-compulsory?

Certificate Holder

Agree

Having non-compulsory elements is essential for us due to the small size and print space restrictions on our products

Disagree

Checkmark-and-tree Logo with license number should be enough as minimum. We need simplification!

Neither agree nor disagree

Son demasiados y exigen un tamaño que no siempre se dispone.

FSC Network Partner

Agree

3.+++Of the three elements listed we view the website address the least important, which is why we believe it should remain optional. 4. No additional comment.

Trademark Portal: Ensure that non-compulsory elements can be removed in the portal before download.

Auditor

Disagree

La dirección web debería ser obligatoria.

Topic 2 Question 13: There are currently restrictions on using the FSC logo and the 'Forests For All Forever' marks on business cards for promotion (clause 7.3). What is your position on this restriction?

Certificate Holder

Maintain the restriction

Business cards are so little used in todays virtual market and online world that this does not matter to discuss.

No utilizamos las marcas "Forests For All Forever"

Remove the restriction

Are there still people who use business cards?!

Business cards should include the relevant FSC licence code of the business if FSC logo or other FSC marks

Other

Not familiar

Certification Body

Remove the restriction

FSC es un valor añadido para las empresas y deberían poder promocionarlo libremente

I see no clear rationale for not allowing it on specific type of promotional material, while allowing it on more or less all other paper-type materials.

Some CHs wish to use the promotional panel on their business cards because it is a good PR for the company.

Forest Industry (non-FSC certified)

Remove the restriction

Currently you can just go to an FSC certified printer and have them print the on-product logo of FFAF logo and the average consumer is none the wiser. So what is the reasoning to not allow this?

FSC Network Partner

Remove the restriction

+++If it is clear what the trademark references (i.e., card stock, promotion, certified products, etc.) it should be allowed. We have seen that more (correct) trademark use tends to be better for FSC.

Topic 2 Question 14: What elements would you consider compulsory for FSC trademark use on eCommerce listings of FSC-certified products?

Certificate Holder

Checkmark-and-tree Logo with license number should be enough as minimum.

FSC logo, FSC license code (only one time on the listing heading or similar)

Logo FSC y codigo de licencia

None - No additional requirements needed. Let's streamline the requirements instead of adding to them.

None, pick and choose which ones are best for promotions

Registered FSC licence code

Certification Body

Logo + licencia

Forest Industry (non-FSC certified)

® after FSC unless not allowed

FSC Network Partner

+++We frequently deal with multiple stakeholders promoting products on eCommerce marketplaces. For us, the license code and FSC logo are the most important elements. If a trademark is incorrect or if we need to understand who is using the trademark it is often impossible unless the license code is included. The license code also aids in how infringements are handled.

For Marketplaces: Sellers license code and trademark symbol/s must be present on each product page. Promotion must be approved by either CB or TSP. For webshops (owned by CH): License code: one use per website is sufficient if easy access to information eg. from footer). Trademark symbol: compulsory to include per subpage/product page.

FSC licence code – there should also be specific requirements for the use of or 'passing on' of information (e.g. product descriptions, manipulated images) featuring the FSC trademarks for use on eCommerce sites managed by another organization and/or to retail customers etc, especially when this is done via data feeds or similar (and therefore intended for, or likely to be, reused by customers, either directly or via third-party e-commerce platforms

License code (both for CH or PLH)

Auditor

Código de licencia y sitio web.

Topic 2 Question 16: What elements do you consider compulsory for using FSC trademarks on social media posts of FSC-certified products?

Certificate Holder
Checkmark-and-tree Logo, nothing else.
FSC logo with link to webpage fsc.org, FSC license code.
Logo FSC y codigo de licencia
None - No additional requirements needed. Let's streamline the requirements instead of adding to them.
None, pick and choose which ones are best for promotions
Registered FSC licence code

Certification Body
Código de licencia
Logo + licencia
None, as long as CH can be easily identified.

Forest Industry (non-FSC certified)
® after FSC unless not allowed

FSC Network Partner
+++FSC logo and license code should be compulsory. Otherwise, it is difficult to identify if the entity posting has a license, or is a brand covered by a license or certification.
None, as long as the social media post itself or the organisation's social media channel/bio links to a website location featuring, or clearly linking to, their FSC promotional panel, or elements thereof
Trademark symbol and license code. Omitting the elements means leaving out 1-2 characters in the post and 10 characters (license code) which can be placed in the end of the post. CHs seem not to understand that use of logo/marks must be followed by the license code and trademarks symbols and omitting the elements is only allowed when trademarks are used in text/post on social media platforms. An aligned us of FSC trademarks through all different platforms will make the requirements easier to understand and increase the use of FSC trademarks by CHs

Auditor
Código de licencia y sitio web.

Topic 2 Question 17: Do you agree that FSC should stop requiring the use of the trademark registration symbol (®, ™) on online marketplaces or social media platforms that do not support their use?

Certificate Holder
Agree
As simple as possible! The fewer specifications, the more frequently it is used, and the better known and more widespread FSC becomes.
Disagree
Los comercios electronicos no tienen destinos fijos, por lo que no tendria sentido colocar el registro de marca porque podria ser cualquiera de los dos ® / TM
Neither agree nor disagree
You could opt for FSC(r) which is common practice in such situations.

Certification Body

Agree

Better to make it possible to use the trademarks more widespread. There are already so many misuses by non-certificate holders (for example retailers). To make it more strict and hard to use the trademarks for those having a certificate and want to tell about it seems contraproductive.

Isn't that already an existing interpretation?

Forest Industry (non-FSC certified)

Agree

Only IF it is not allowed. But some kind of statement should be added

FSC Network Partner

Agree

'do not support' needs careful parameters and qualification

+++If the platform doesn't support it, having CHs or PLHs try to work through the requirement adds complexity and time. We believe it is additional unnecessary stress.

Unless it brings security, a certain flexibility should be allowed here

Disagree

Protecting FSC trademarks and ensuring that we are able to enforce our right must be the priority. I don't see the difference between companies/consumers seeing the FSC trademarks on marketplaces that do not support the use of trademark symbols and all other platforms/materials where the use is required.

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