



# PUBLIC CONSULTATION REPORT

Revision of FSC-STD-50-001 – Drafting phase  
First draft

1/08/2025



# FOREWORD AND INTRODUCTION

## Introduction

FSC extends its thanks to all stakeholders who participated in the public consultation on the revision of FSC-STD-50-001, *Requirements for Use of the FSC Trademarks by Certificate Holders*.

We also appreciate the contributions of those who took part in the webinars held during the consultation period. The feedback gathered during these sessions provided valuable input and has been incorporated into 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 process

FSC is revising the standard *Requirements for Use of the FSC Trademarks by Certificate Holders* (FSC-STD-50-001). This document contains the requirements 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 drafting phase, the process team, with the support of a technical working group composed of 5 experts from different stakeholder groups, has developed the first draft of the new set of requirements for using the FSC trademarks.

After a focused consultation carried out in 2024, a public consultation was opened on April 6<sup>th</sup>, 2025, and closed on June 6<sup>th</sup>, 2025. This document summarizes the feedback captured during the public consultation on the proposed draft of the FSC Trademark Standard.

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 [trademark@fsc.org](mailto:trademark@fsc.org).

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## ABBREVIATIONS

<b>ES</b>	Ecosystem Services
<b>CoC</b>	Chain of Custody
<b>CW</b>	Controlled Wood
<b>WG</b>	Working Group

# PART 1: PARTICIPATION IN THE CONSULTATION

A total of 244 participants took part in the consultation. Below is the breakdown of the respondents by country.

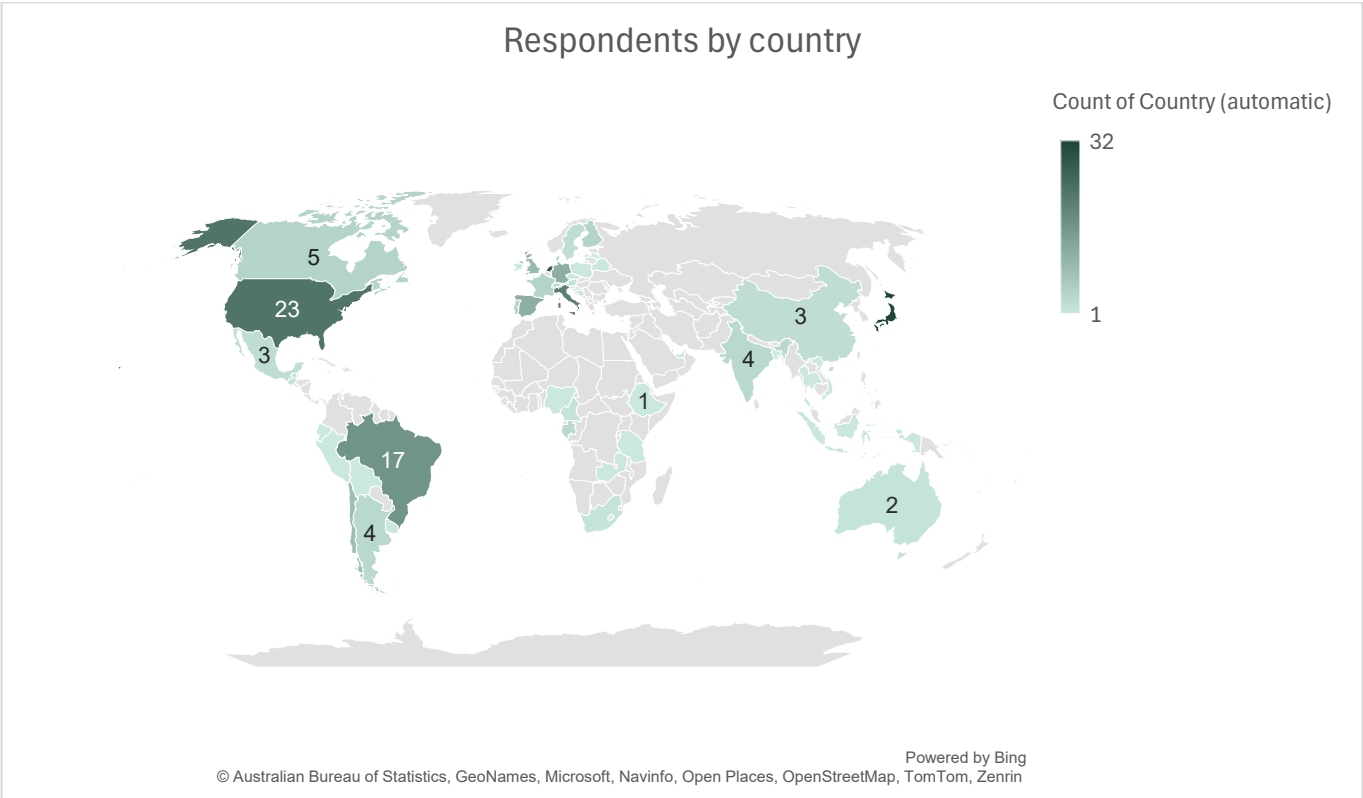


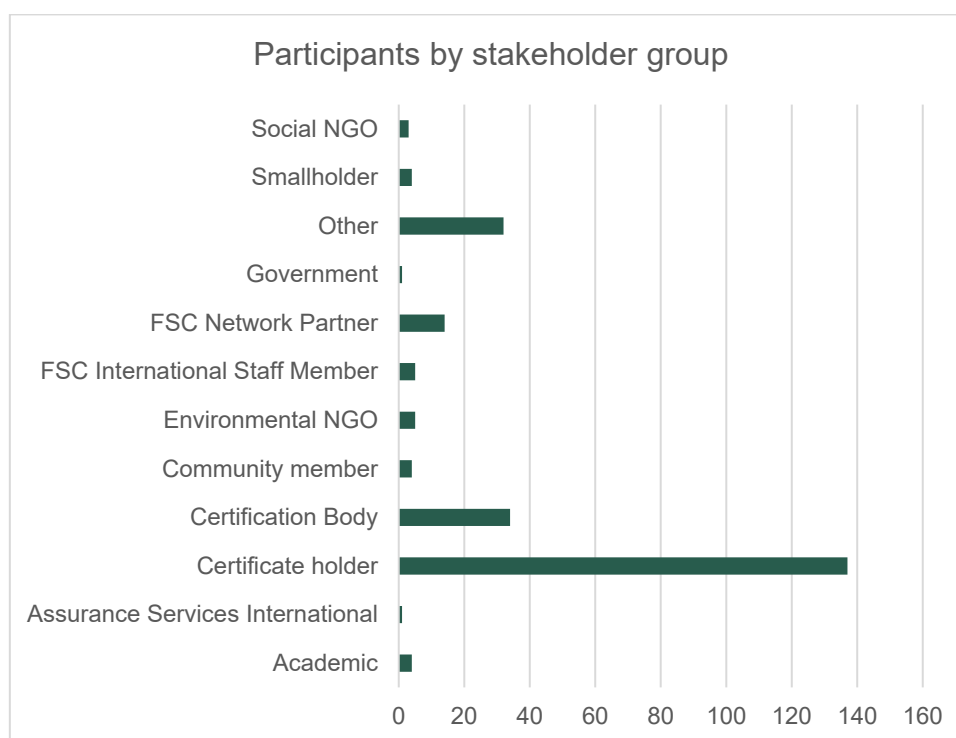
Figure 1. Participants by country

In terms of regional representation, Europe has the highest representation with a total of 117 participants, Asia follows with 45, Latin America accounts for 39, North America contributes 28, and Africa has the lowest representation with 13 participants.

Countries with the highest number of respondents	
Country	Number of respondents
Japan	28
Netherlands	27
United States	23
Italy	20
Brazil	16

## Participants by stakeholder group

Certificate holders made up by far the largest group of participants, with nearly 150 stakeholders involved. Certification bodies and those in the "Other" category showed moderate participation, with approximately 30–40 participants each. Notably, there was also strong engagement from FSC Network Partners and FSC International staff members.



*Figure 2. Participants by groups of stakeholders.*

## PART 2: METHODOLOGY

The process implemented to evaluate the feedback obtained in the consultation included qualitative and quantitative analysis. The consultation included a combination of closed and open-ended questions that covered the proposed topics to be revised during the drafting phase by the working group.

### A. 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 context on how said specific issue would work or fail to work in their individual case.

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.

### B. 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.

## PART 3: SUMMARY OF COMMENTS AND FSC FEEDBACK

This section is organized according to the key topics presented in the public consultation. Each subsection presents: a) a brief topic recap (as included in the consultation material), b) the quantitative analysis, and c) the qualitative analysis.

*Table 1. List of consultation topics.*

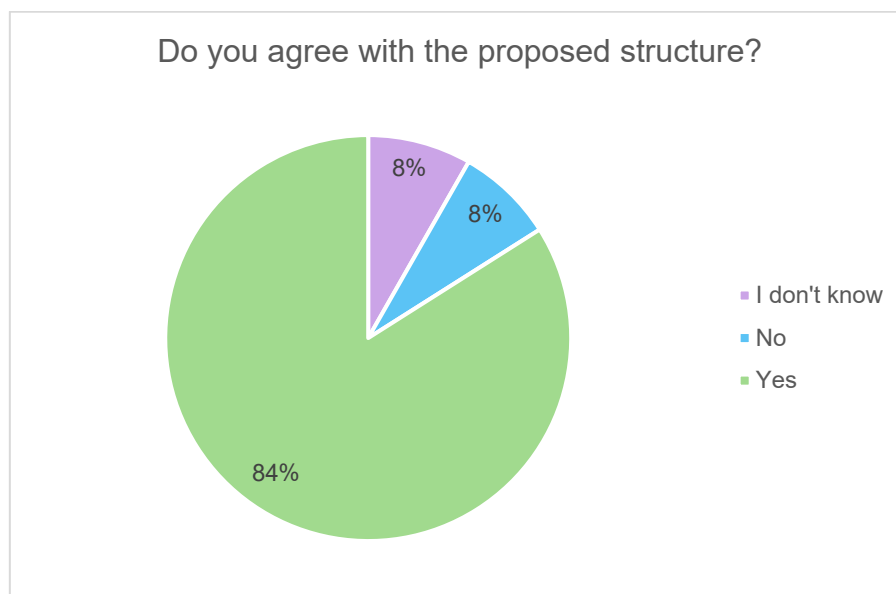
Topic from consultation	
<b>Topic 1</b>	Structure
<b>Topic 2</b>	Scope, references, terms and definitions, and abbreviations
<b>Topic 3</b>	Ground rules for using the FSC trademarks
<b>Topic 4</b>	Selecting the FSC label
<b>Topic 5</b>	Labelling requirements
<b>Topic 6</b>	Promotional elements
<b>Topic 7</b>	Promotional use requirements
<b>Topic 8</b>	Promotional use on Social Media
<b>Topic 9</b>	Promotional use on e-Commerce
<b>Topic 10</b>	Graphic rules for FSC on-product labels and FSC logo
<b>Topic 11</b>	Graphic rules for 'Forests For All Forever' marks
<b>Topic 12</b>	Rules for FSC QR labels
<b>Topic 13</b>	Restrictions on using FSC trademarks
<b>Topic 14</b>	Annex A – Trademark Management Use System
<b>Topic 15</b>	Annex B – Group and Multisite
<b>Topic 16</b>	Annex C – Project Certification
<b>Topic 17</b>	Annex D – Promotional Statements
<b>Topic 18</b>	Additional Feedback

## Topic 1. Structure of the document

### Question 1. Do you agree with the proposed structure?

#### Quantitative results

A significant percentage (84%) of the stakeholders that participated in the consultation agreed with the proposed structure of the standard, and only 8% percent disagreed with it.



#### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	The introduction of rules for using the FSC trademarks on social media and e-Commerce, and the QR label is welcomed.	FSC appreciates the positive feedback regarding this specific aspect.
2	The graphic requirements should be included directly in the respective sections for labelling and promotion.	A separate section for graphic requirements is recommended considering the overlap of some requirements for labelling and promotion, which would cause repetition if presented differently. Nonetheless, this proposal will be discussed with the WG.
3	The QR label should have its section, instead of having two individual clauses in the labelling section.	FSC will consider this option together with the WG to give more visibility and clarity to the rules for using QR labels.
4	Formatting of the document can be improved: Use Roman numerals and better formatting (e.g., acronyms list, tables of contents).	FSC will implement the suggested changes in the draft.



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Avoid repetition and cross-referencing between clauses that confuse the reader.

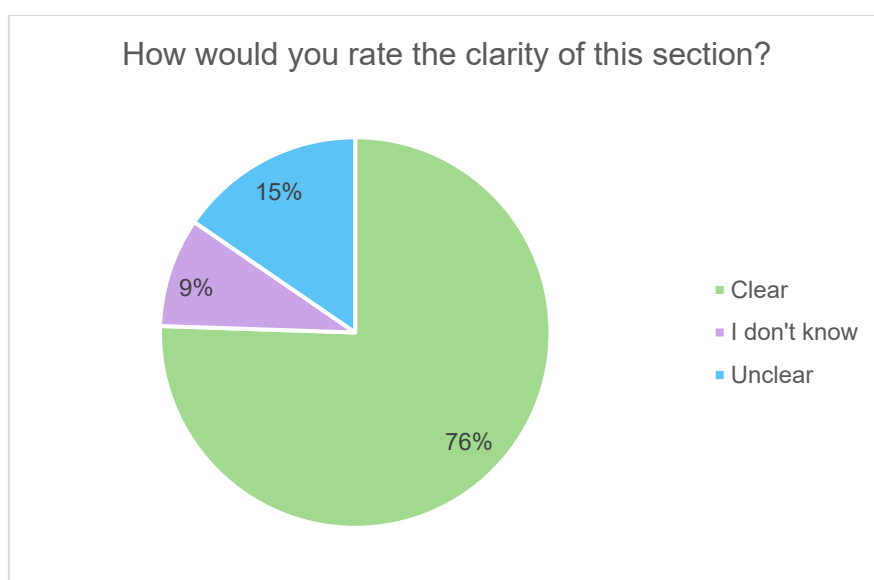
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## Topic 2: Scope, references, terms and definitions, and abbreviations

### Question 2. How would you rate the clarity of this section?

#### Quantitative results

A significant percentage (76%) of the stakeholders who participated in the consultation consider this introductory section clear, and 15% percent found that the clarity could be improved.



#### Qualitative results

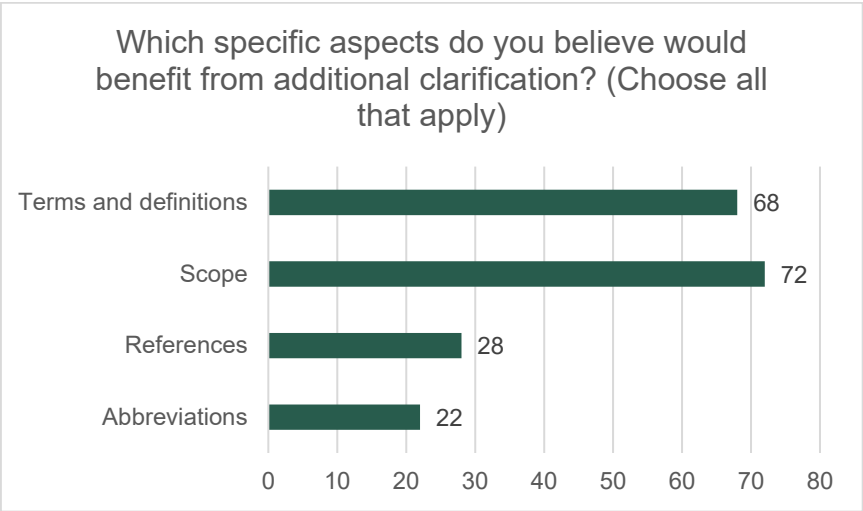
Nr.	Stakeholder Feedback	FSC response
1	Numerous respondents expressed confusion and concern regarding the phrase "in a private context outside the course of trade", which appears in the scope section.	<p>The scope section should be read in light of the definitions provided for this concept of "in a private context outside the course of trade".</p> <p>In any case, FSC will provide additional guidance on what this concept means and how it should be interpreted by the users of the standard.</p>
2	Additional definitions must be included, for example: material (to clarify usage in requirements 4.4 and 4.5), FSC-certified product, promotion, promotional panel, promotional materials, FSC label, and FSC logo.	The suggested definitions will be taken into consideration to be included in the draft.

### Question 3. Which specific aspects do you believe would benefit from additional clarification?

#### Quantitative results

The results reveal that stakeholders see the greatest need for additional clarification in the Scope (72 responses) and Terms and Definitions (68 responses) sections of the FSC standard, highlighting the need for further information and clarity on what falls within the scope of the standard and the meaning of

key terms. Fewer respondents identified References (28) and Abbreviations (22) as needing clarification, though these areas still represent opportunities for further improvement.



Qualitative results

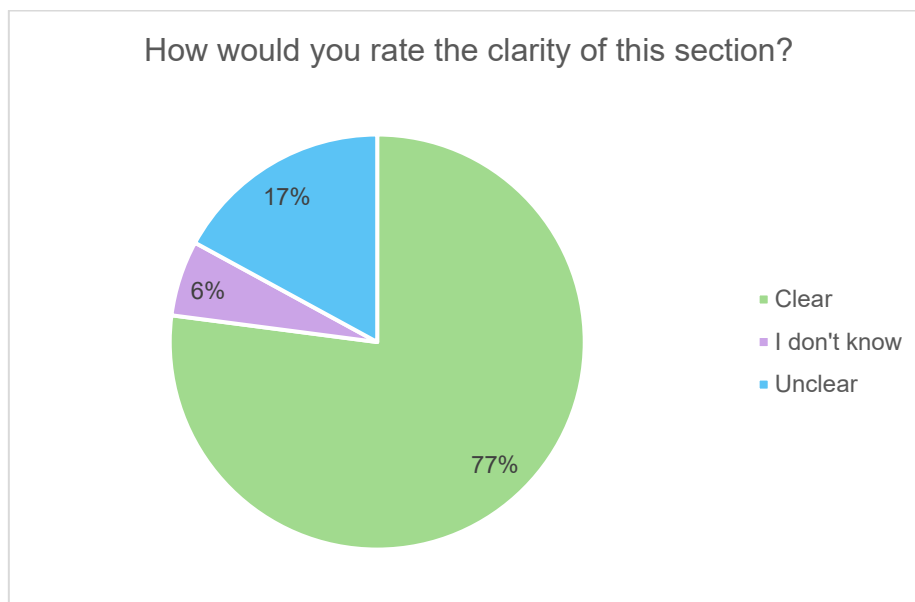
Nr.	Stakeholder Feedback	FSC response
1	Definitions could be more precise. There are certain unclear terms and redundant expressions.	FSC has taken note of the various comments and suggestions, which will be implemented on the standard draft.
2	The term “product type” can lead to confusion with the “product type” definition of Chain of Custody (See STD-40-004a).	FSC will raise this conflicting definition during the next WG meeting and will propose a new definition to this term.
3	ES claims were not included in the draft.	As ES claims cannot be made by all certificate holders, but only by those who have been certified against the Ecosystem Service Procedure, the draft won’t regulate these types of claims. All requirements about making ES claims are included in FSC-PRO-30-006. An explanatory note will be included as part of the scope of FSC-STD-50-001.

Topic 3: Ground rules for using the FSC trademarks

Question 4. How would you rate the clarity of this section?

Quantitative results

A significant percentage (77%) of the stakeholders who participated in the consultation consider this section clear, and 17% percent found that the clarity could be improved.



### Qualitative results

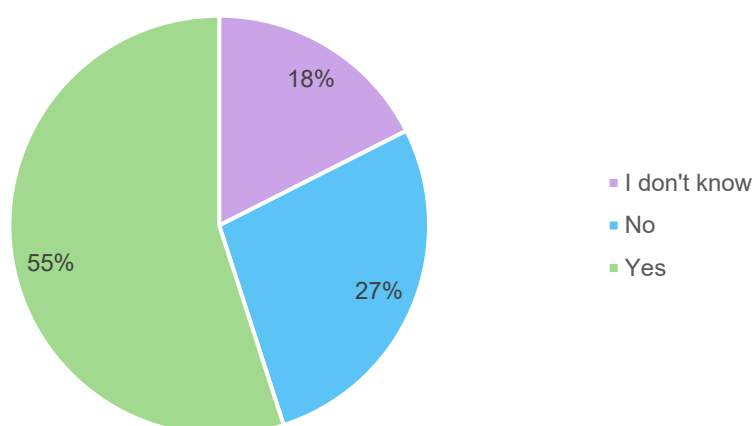
Nr.	Stakeholder Feedback	FSC response
1	The clause regarding registration symbols (1.6) is difficult to understand. In addition, stakeholders found the first bullet point contradictory and confusing, especially in countries where FSC owns registered trademarks.	FSC will discuss how to best address this issue with the WG. Potentially, the Trademark Registration List will be maintained to meet the needs of certificate holders.
2	Provide additional clarity on the “all intended uses” term in clause 1.7. regarding the approval of use.	FSC will provide additional guidance and clarity regarding the concept of “all intended uses”. An additional definition may be considered.
3	Clause 1.11 may not be auditable due to its content.	FSC will assess whether this clause can be introduced as an explanatory note, instead of a requirement.

**Question 5. Do you agree with the requirement that the <sup>™</sup> registration symbol shall be used for the name ‘Forest Stewardship Council’ and the initials ‘FSC’ at their first or most prominent use, and that the correct registration symbol for the FSC Logo, the ‘Forests For All Forever’ mark, the FSC labels, and the promotional panel designs will be automatically selected in the FSC Brand Hub based on the country of distribution?**

### Quantitative results

The majority of the respondents support the proposed requirements (55%). A number of stakeholders disagreed (27%) with the changes to the use of the registration symbol with the FSC marks, see their main concerns below

Do you agree with the requirements on registration symbols?



Nr.	Stakeholder Feedback	FSC response
1	Regarding the use of the symbols on texts, stakeholders are concerned about the inconsistency of the use of the registration symbols in countries in which the FSC trademarks have been registered. Some of them foresee that these changes will lead to additional confusion for users of the standard and consumers, as well as additional effort for certificate holders to comply with the standard.	FSC understands that modifying the rules for uses of the registration symbols will have an impact on previous uses of the FSC trademarks in which the Trademark Registration list had to be followed. Nevertheless, FSC aims to have clearer rules for using the trademarks. Hence, the possibility of not changing the existing requirements will be discussed with the WG.
2	Stakeholders require additional guidance on what symbol to use in case of multiple or unknown distribution countries.	FSC foresees this issue to be resolved with the help of the technology, namely by having an auto-selection tool integrated in the FSC Brand Hub.
3	Registration symbols should be removed altogether.	Despite understanding the additional complexity of these symbols bring to the use of FSC trademarks, the registration symbols are a crucial legal instrument for protecting said trademarks and informing consumers that FSC is not a generic term, but the mark of responsible forestry. While the symbols cannot be removed, FSC aims to make their use easier for certificate holders

**Question 6. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

Nr.	Stakeholder Feedback	FSC response
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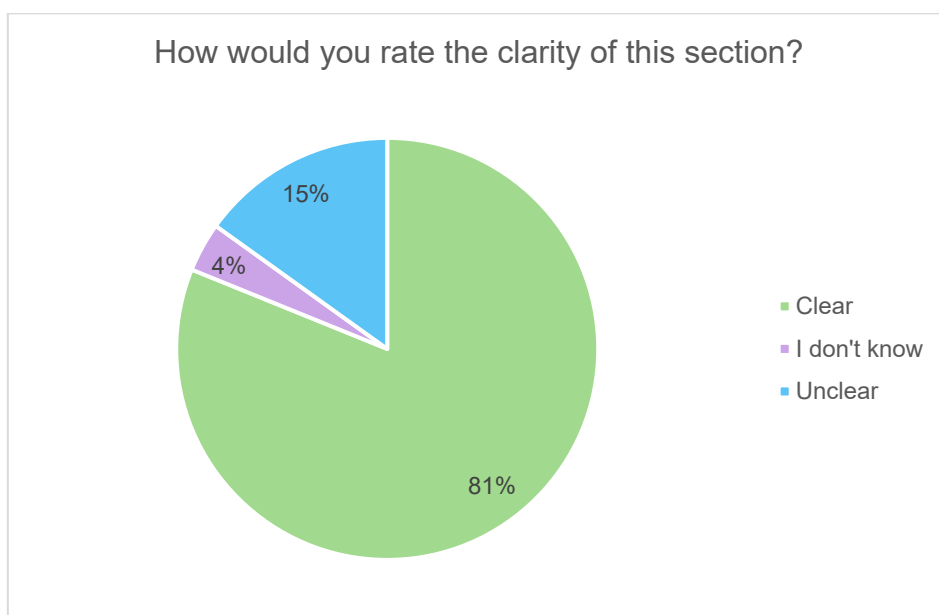
1	The approval of trademarks could be done directly by FSC and not through the certification body.	The practice of third-party approval of claims aligns with best practices for claims management in certification schemes and represents an important anti-greenwashing safeguard in the FSC system.
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## Topic 4: Selecting the FSC label

### Question 7. How would you rate the clarity of this section?

#### Quantitative results

A vast majority of respondents found the section on the FSC label clear. Only 15% considered that the clauses in this section can be improved.



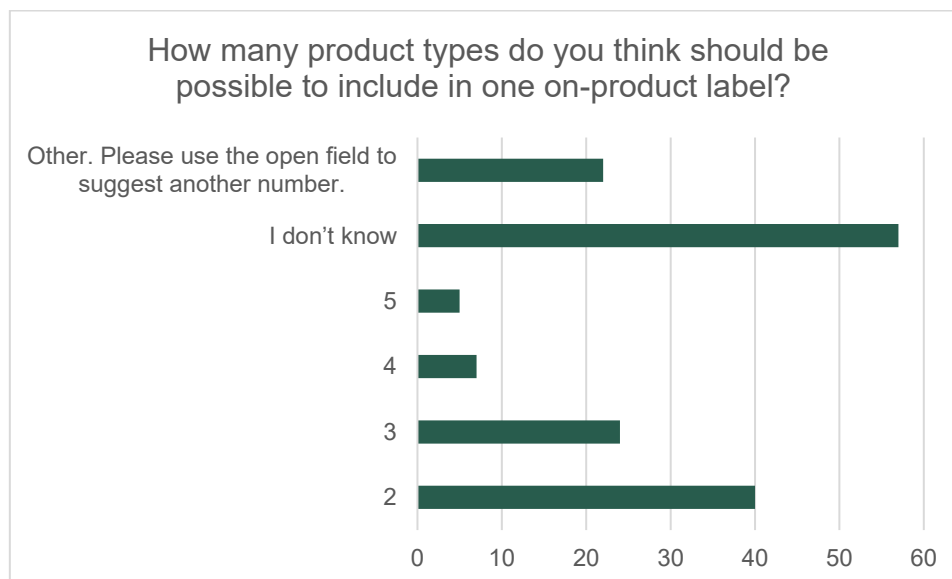
#### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Note below clause 2.2 should be included as a requirement, as it contains the verbal form "shall".	FSC will implement this comment into the draft after discussing it with the WG.
2	Additional guidance is required for selecting the correct product type.	FSC will produce additional guidance with clear examples on how to correctly select the product type in a product that may have multiple elements and/or components with different FSC claims.

**Question 8. The proposed standard allows for the inclusion of multiple product types in a single on-product label when more than one material in the product is FSC-certified. How many product types do you think should be possible to include in one on-product label?**

#### Quantitative results

The participants suggested that a maximum of two product types should be indicated in the label, and a large number did not provide a specific amount.



## Qualitative results

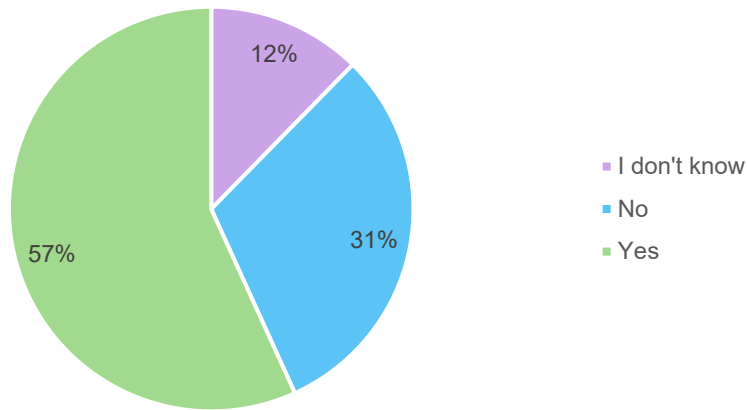
Nr.	Stakeholder Feedback	FSC response
1	The possibility of adding more than one product type is generally welcomed by the stakeholders. However, to preserve the legibility of the label and prevent oversized designs, the limit should be 2 or 3 product types.	FSC appreciates the positive feedback regarding the additional product types in the FSC label. As part of the FSC Brand Hub ongoing developments, the process team will ensure that 3 product types can be inserted in the same label.
2	Additional guidance will be required for cases in which both packaging and product are certified with different FSC claims.	FSC will produce additional guidance with clear examples on how to correctly address these cases, and how to include multiple FSC labels on a product.

**Question 9. To increase transparency of the FSC-certified material(s) in a product, it is proposed to require an additional statement to clarify the specific certified component when the product type included in the label does not sufficiently specify this information (Section 2.4). Do you agree with this new requirement?**

## Quantitative results

The new requirement was generally accepted by the stakeholders, with 57% agreeing with its inclusion. Nevertheless, a considerable 31% objected to this clause and provided constructive feedback.

### Do you agree with this new requirement?



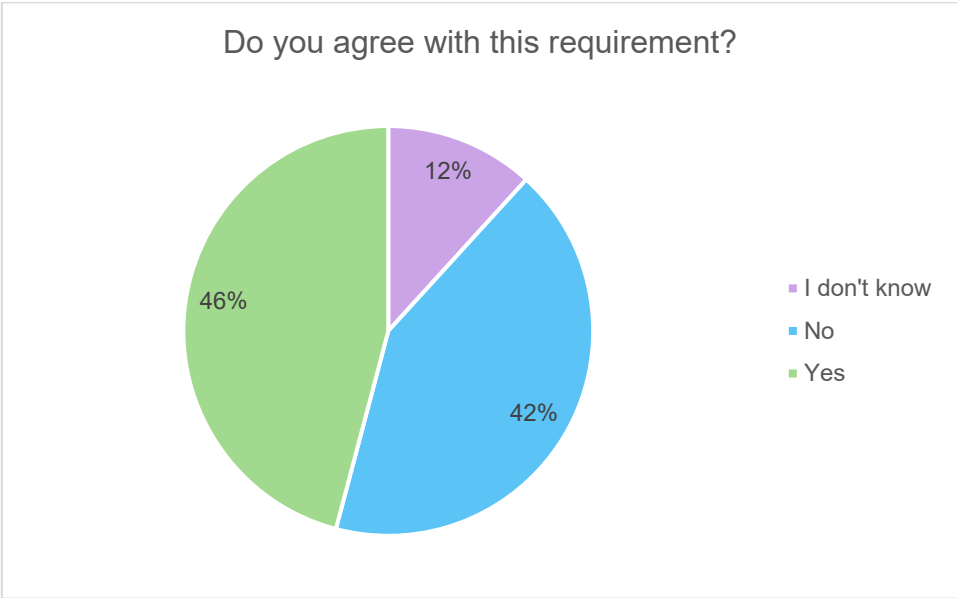
### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	<p>The phrase "may mislead consumers" is seen as too vague and subjective.</p> <p>Stakeholders warn that it opens the door to inconsistent interpretations by certificate holders, certification bodies, and auditors.</p>	FSC will discuss the feedback with the WG to decide how to improve the wording, reducing the uncertainty and subjectivity of this clause.
2	<p>Stakeholders requested:</p> <ul style="list-style-type: none"> <li>- Concrete examples of potentially misleading situations (e.g., FSC label on packaging of non-certified contents).</li> <li>- Sample text for acceptable statements.</li> <li>- Explicit guidelines on when and how to apply the requirement.</li> </ul>	FSC will produce additional guidance with clear examples on how this clause is expected to be applied.
3	<p>Stakeholders reflected that a more comprehensive and detailed product type list is a better instrument to reduce consumer confusion.</p>	FSC acknowledges this feedback and will discuss internally how much specificity can be introduced when making product types available. Nonetheless, FSC must balance expanding the product list with ensuring clarity about certified material. This clause serves to address unlisted scenarios and prevent misleading claims.
4	<p>To avoid having unwanted impact regarding the packaging already produced or printing devices already procured, stakeholders recommend introducing this requirement as a "should" instead of a "shall".</p>	FSC will discuss the possibility of introducing flexibility for this requirement together with the WG.

**Question 10. Upcoming legislation measures and regulations across the globe are introducing stricter requirements for environmental claims regarding verification, substantiation, and communication. In response, it is proposed that all label elements (except for the Moebius loop) be made mandatory. Do you agree with this requirement?**

**Quantitative results**

The inclusion of mandatory elements in the FSC label has left participants undecided, with a considerable number of voters in favour and against. Despite a majority (46%) agreeing to this inclusion, 42% of stakeholders have voted against these requirements.



**Qualitative results**

Nr.	Stakeholder Feedback	FSC response
1	<p>A dominant theme across responses is that expanding the list of compulsory label elements (including website and label text) increases the label size, which poses serious challenges for products with limited packaging space.</p>	<p>FSC is aware of the impact on the size of the label that these changes will bring. Hence, FSC will assess if more flexibility can be offered in the graphic rule to ensure that the FSC label can fit even in small packaging and products.</p>
2	<p>Stakeholders strongly object to mandatory redesign of all on-product labels, citing:</p> <ul style="list-style-type: none"><li>- High costs to update printing plates and artwork</li><li>- Inventory waste from obsolete packaging stock</li><li>- Administrative strain across thousands of stocks keeping units</li></ul> <p>This is especially concerning for companies still recovering from the cost of the previous label update (notably the FSC MIX change).</p>	<p>FSC notes the concerns raised and will revisit the compulsory elements list. Additionally, FSC will discuss with the WG an extended transition period to ensure that they can implement the changes in a timely manner and without causing any significant economic or environmental impact.</p>



3	<p>Many respondents challenge the rationale behind making label text and the FSC website address mandatory:</p> <ul style="list-style-type: none"> <li>- Consumers rarely type in a full URL from packaging</li> <li>- The FSC logo and license code already provide traceability</li> <li>- Additional text of the MIX label does not provide any clarity</li> </ul>	<p>The elements “FSC website address” and “Label text” have been included as compulsory in an effort to fill the potential gaps between the FSC normative framework and the adopted and upcoming anti-greenwashing legislation. In that sense, FSC will obtain additional legal support to determine if these elements must indeed be included or if they can remain optional.</p>
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**Question 11. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

### Qualitative results

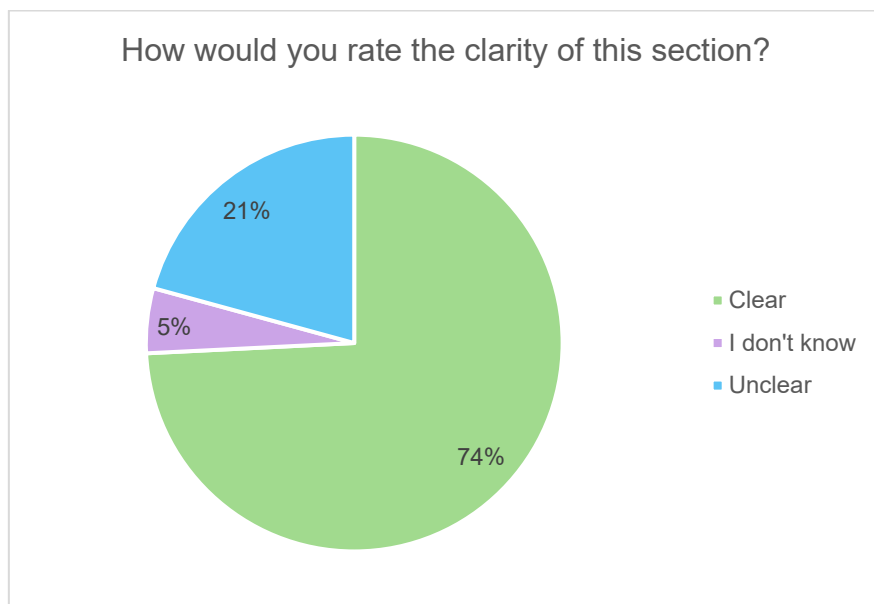
Nr.	Stakeholder Feedback	FSC response
1	<p>The product type element is indeed relevant for the stakeholders, and in that sense, additional support and guidance is required to clarify ambiguous classifications and cases of composite multipurpose materials.</p>	<p>FSC will support certificate holders with various materials and trainings to correctly implement the product type into their FSC labels.</p>
2	<p>Multiple respondents advocate for a long transition period (3–5 years) if full label revisions are implemented. Many request that:</p> <ul style="list-style-type: none"> <li>- Existing packaging be allowed to remain in use indefinitely</li> <li>- New label requirements only apply to new designs going forward</li> <li>- Optional elements remain optional, especially for on-product use</li> </ul>	<p>FSC is considering an extended timeline to address the changes in the standard that may have an impact on the FSC label.</p>

## Topic 5: Labelling Requirements

**Question 12. How would you rate the clarity of this section?**

### Quantitative results

A large majority of the participants rated this section as clear, and only 21% indicated that the section is unclear. This latter group provided additional useful feedback for the revision.



### Qualitative results

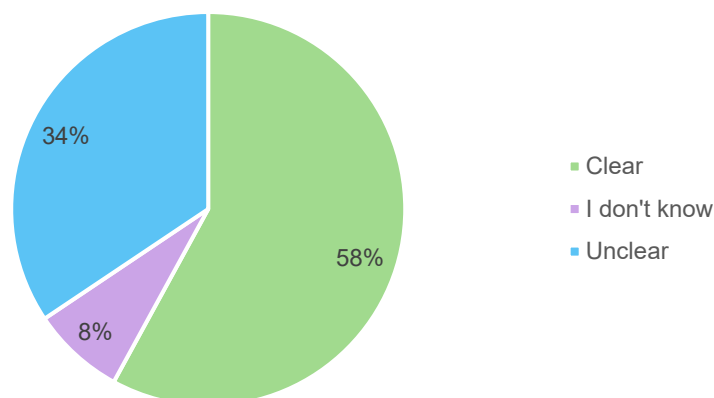
Nr.	Stakeholder Feedback	FSC response
1	Clause 3.1. could be more specific and clear regarding what the “relevant forest-based parts” of the products are.	FSC will align internally to determine the best mechanism to reference the current respective sections of the CoC Standard about labelling requirements and its Annex C - <i>Examples of which components of a product need to be certified (normative)</i> . An additional consideration is the ongoing revision of the CoC Standard.
2	Stakeholders indicate that there is major confusion over the term “clearly visible” in clause 3.2.	FSC will provide additional guidance with practical examples of what is meant by this term. In addition, a definition will be proposed to the WG.

**Question 13. Clauses 3.3 and 3.4 were included to ensure transparency and help consumers verify and trust FSC-certified products. How would you rate the clarity of these clauses?**

### Quantitative results

Although a majority (58%) of the participants indicated that the proposed clauses were clear, a considerable 34% of participants recommended providing more clarity and additional examples of these requirements, see their inputs below

### How would you rate the clarity of these clauses?



### Qualitative results

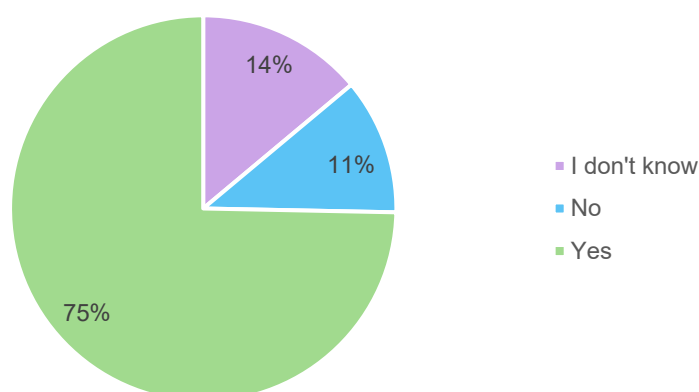
Nr.	Stakeholder Feedback	FSC response
1	It is key to have explicit examples of how these requirements work and address frequently asked questions regarding these clauses.	FSC will produce additional guidance with clear examples on how this clause is expected to be applied.
2	These clauses can create potential overlap between on-product use of the trademarks and promotional use.	This potential issue will be discussed with the WG to determine how this issue can be avoided and provide clarity on which rules apply to each case.

**Question 14. If you have answered “Unclear” to the previous question, would adding practical examples in the standard or guidance address your concern?**

### Quantitative results

Aligned with the open comments on the previous questions, the participants highlighted that practical examples are crucial to understanding the requirements in clauses 3.3. and 3.4. A large 75% expect to receive further guidance as part of the standard revision process.

### Would adding practical examples in the standard or guidance address your concern?



## Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	There is strong support for including visual examples directly in the standard or linking to a regularly updated guidance document.	FSC will develop visual examples in an additional guidance document that will use practical cases to exemplify the requirements.
2	The terms “additional FSC trademarks or references” are ambiguous.	FSC will assess how to improve the wording to avoid including misleading and ambiguous terms.

**Question 15. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

## Qualitative results

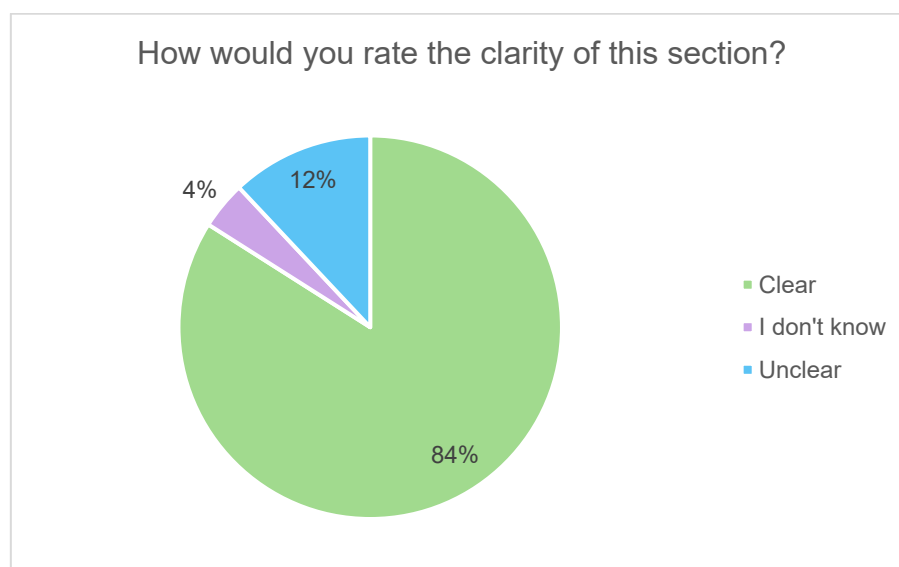
Nr.	Stakeholder Feedback	FSC response
1	Requirements to obtain approval before using labelling agreements or to re-sign labelling agreements every time a product group is added (3.5 c i) are seen as unnecessarily burdensome.	FSC will revisit the requirements for labelling agreements with the WG to ensure that they are flexible for certificate holders as well as provide enough safeguards to the integrity of the scheme.
2	Additional guidance on how the labelling agreements work is required and necessary for the correct application.	FSC will develop additional guidance with practical examples on the labelling agreements.

## Topic 6: Promotional elements

**Question 16. How would you rate the clarity of this section?**

## Quantitative results

The section on promotional elements was regarded as clear by 84% of the participants in the consultation — only a minor 12% considered that the section could benefit from additional clarity.



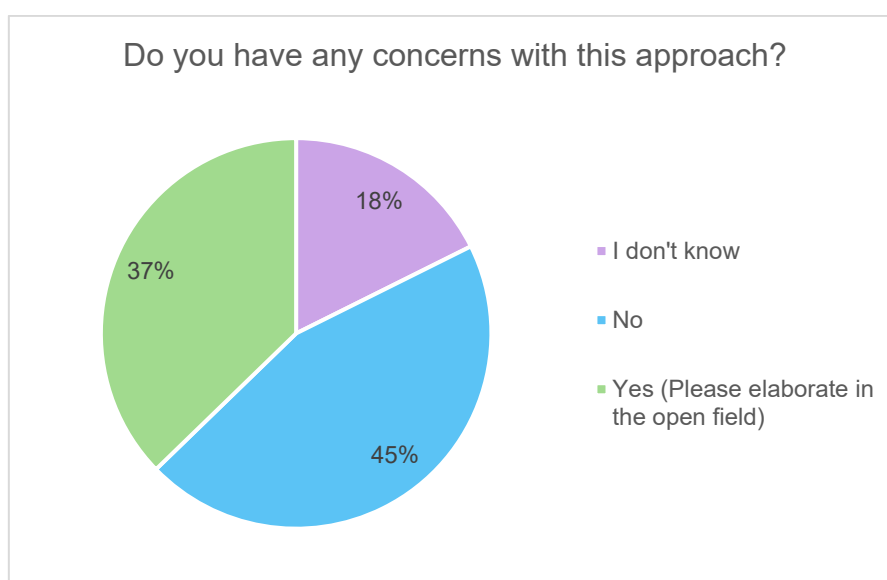
## Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Multiple stakeholders stressed that there is widespread confusion around when and how to use the promotional panel, the standalone FSC logo or FFAF trademark, and the promotional statements of Annex D.	FSC will produce guidance document with illustrative examples on how to correctly use trademarks in a promotional context.
2	There is a need for further clarity with regards to the following terms: <ul style="list-style-type: none"> <li>- Promotional channels</li> <li>- Promotional materials</li> <li>- Media</li> <li>- Panel text</li> </ul>	FSC will assess whether additional definitions can be included to provide clarity on the use of indicated terms.

**Question 17. Upcoming global legislation is introducing stricter requirements for environmental claims regarding verification, substantiation, and communication. In response, it is proposed that when using the FSC trademarks in promotional materials, one of the compulsory elements is the promotional statement (Section 4.2). Do you have any concerns with this approach?**

## Quantitative results

A majority (45%) of stakeholders who replied to this question indicated that they do not have concerns about including promotional statements as a compulsory element when using the FSC trademarks in a promotional context. Nonetheless, a significant number of participants (37%) have raised concerns over the proposed requirement.



## Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Making promotional statements compulsory with every use of the FSC trademarks may discourage their use. Stakeholders emphasize:	FSC will share the feedback received with the WG and assess how to address these issues in the final draft.

- Already printed materials would need to be modified.
- Increased costs for redesign.
- Space limitations when applying the FSC trademarks to certain items.

<b>2</b> Stakeholders indicated that the clause currently frames the promotional statement first, which is misleading since most users will apply the promotional panel instead.	FSC will analyse whether a modified wording in the proposed alternative would have a positive effect on the readability and clarity of the clause.
<p>Suggested rewording:</p> <p><i>“If the promotional panel is not used, then a promotional statement must be included...”</i></p>	
<b>3</b> Promotional statements in Annex D are seen as too long, rigid, and lack of creative flexibility.	FSC will discuss with the WG if some flexibility can be granted for the statements of Annex D. This could be either providing shorter and more attractive phrases or making the list non-exhaustive and customizable by certificate holders.

**Question 18. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

### Qualitative results

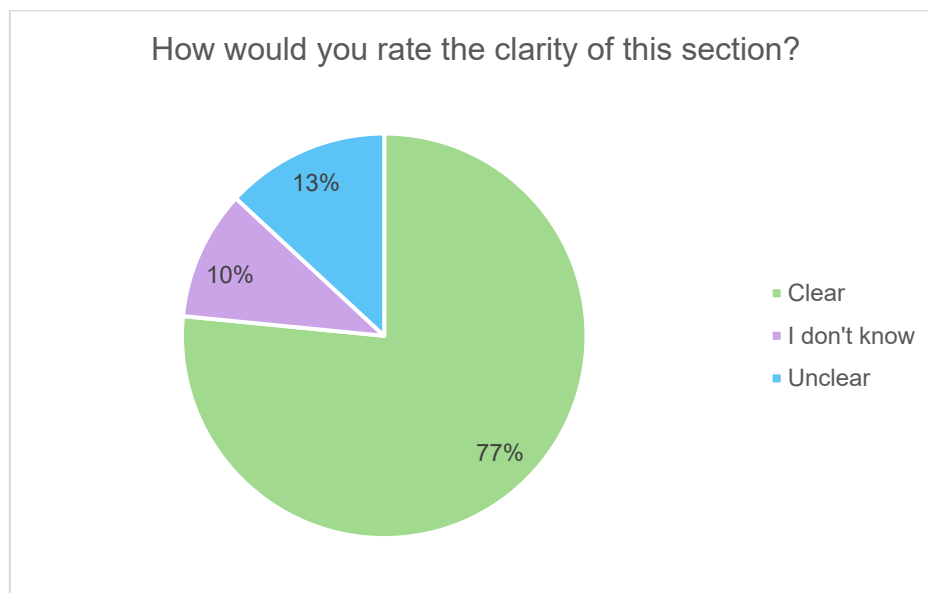
Nr.	Stakeholder Feedback	FSC response
1	The “panel text” and “FSC website address” elements of the promotional panel are excessive and should not be compulsory.	FSC will discuss with the WG if some flexibility can be allowed with the elements of the promotional panel. The decision has to be a balance between ease of use and conformity with existing legislation on communication of claims and information transparency.
2	FSC should offer more versions of the promotional panel, including a landscape version, and with specific guidance on how to use it online.	FSC will analyse whether more designs can be offered together with the promotional panel.
3	Improve the “panel text” examples and allow previously allowed phrases such as: “Ask about our FSC-certified products.” “FSC-certified material available.”	FSC will create a list indicating all the allowed variations of the panel text, including the ones allowed under version 2.1 of the Trademark Standard.

## Topic 7: Promotional use requirements

### Question 19. How would you rate the clarity of this section?

#### Quantitative results

The section on promotional use requirements was considered clear by 77% of the stakeholders. 13% considered that the section could be improved.



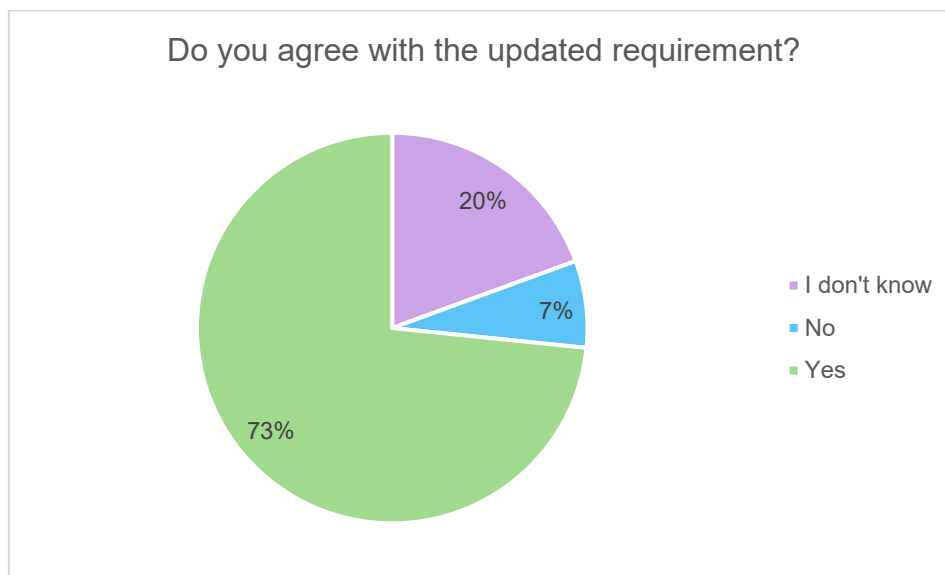
#### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Clause 5.1 does not indicate clearly how to correctly promote products that can be certified <i>on request</i> . (i.e. that the product is not FSC certified, but upon request from a customer, the product to be delivered will be certified).	FSC will determine the best way to increase clarity regarding the certified products on request (additional clause, explanatory note or another method).
2	Some ambiguous terms could benefit from a definition or clearer wording: <ul style="list-style-type: none"><li>- Uncertified products</li><li>- Applicable labelling requirements</li></ul>	FSC will provide additional guidance with examples that will help CHs to understand these terms. In addition, cross-references will be implemented where possible to ensure alignment between the CoC Standard section on labelling requirements and the Trademark Standard.

**Question 20. Previous requirement indicated that promotional items not-for-sale made wholly or partly of wood should be eligible for labelling. We propose extending this requirement to include all forest-based materials to avoid discrimination and ensure consumers are not misled by promotional items not-for-sale. Do you agree with the updated requirement?**

#### Quantitative results

The updated requirement was welcomed by 73% of the participants, and only 7% did not agree with the requirement.



## Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	<p>Stakeholders generally agree with the underlying intent of this section. However, there are some concerns about the effects of this section and how it may lead to:</p> <ul style="list-style-type: none"> <li>- Bottlenecks to obtain FSC certified items.</li> <li>- Impossibility to promote non-for-sale items in countries in which there is little FSC supply infrastructure.</li> <li>- Significant increases in costs for otherwise cheap items such as pencils or flyers.</li> </ul>	<p>FSC will discuss the feedback received together with the WG to find a solution to the issues raised by the stakeholders.</p>
2	<p>The requirement could be proposed as a strong recommendation in the verbal form “should” instead of “shall” to ensure that certificate holders can have some flexibility to continue promoting on certain items that are not easy to find with an FSC claim.</p>	<p>This proposal will be introduced to the WG to be discussed as a potential solution to the issues raised against this section.</p>

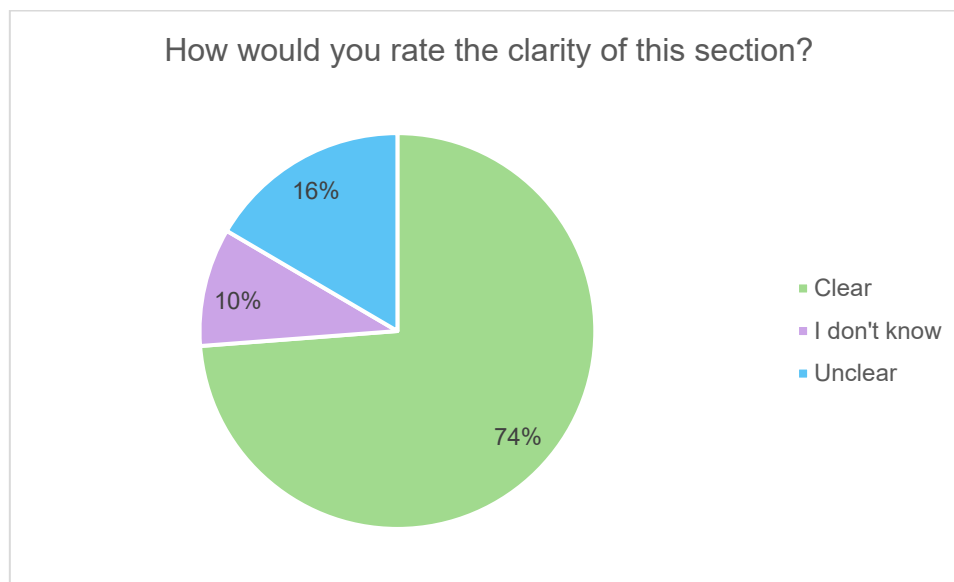
## Topic 8: Promotional on Social Media

### Question 22. How would you rate the clarity of this section?

## Quantitative results

The new requirements for promoting on social media were welcomed by the participants, and were considered clear( 74%) while 16% of stakeholders suggested additional wording.





### Qualitative results

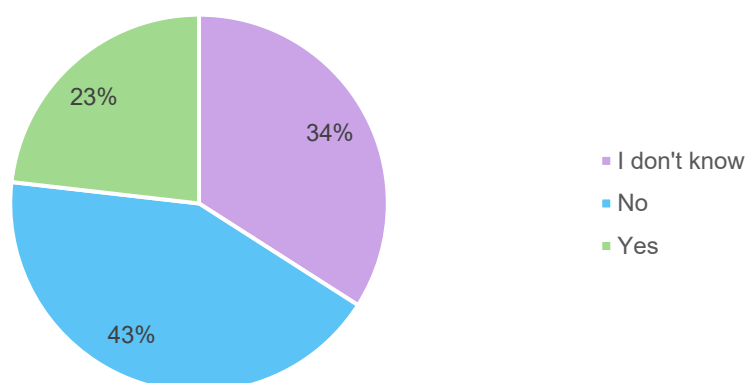
Nr.	Stakeholder Feedback	FSC response
1	FSC should define what qualifies as “website where compulsory elements are visible” and whether the account profile/bio meets this condition.	FSC will improve the wording of clause 6.1 to ensure clear, precise wording. Additionally, FSC will provide guidance and examples.
2	<p>Many stakeholders oppose requiring the promotional statement (from Annex D) in every social media post, citing:</p> <ul style="list-style-type: none"> <li>- Space limitations</li> <li>- Incompatibility with certain platforms (e.g., Instagram doesn't allow clickable links in captions)</li> <li>- Disruption of brand voice or readability</li> </ul>	FSC will analyse these challenges and try to provide a solution that considers them. However, it is important to keep in mind that a standalone logo on a social media post can be considered as a generic environmental claim due to the lack of specificity; thus, additional information should be provided to consumers.
3	FSC should either clearly require or exempt trademark symbols on social posts. If exempted, please explain why, considering international IP practices.	The registration symbols are not compulsory on social media posts as they are not supported on certain social media platforms. However, FSC will provide additional guidance about where the symbols can be added - e.g. if the logo is used in an image

**Question 23. Do you think any relevant requirements for using the FSC Trademarks on social media are missing?**

### Quantitative results

23% of respondents considered that requirements are missing (input below), and 43% said that they are satisfied with the proposed requirements.

Do you think any relevant requirements for using the FSC Trademarks on social media are missing?



### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	FSC should provide a requirement indicating where the link to a website address must be placed: whether in post, bio, caption, and how to deal with social media platforms that restrict third-party links.	FSC will provide additional information and guidance to the requirement for user to clearly understand how to provide a link to a website address in which the compulsory elements can be visible.
2	An additional requirement for correctly repost and share third-party posts should be included.	FSC will evaluate if a general requirement can be introduced to regulate this specific aspect. Additional guidance can also be helpful for that purpose.

**Question 24. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	FSC may need to defend or revise its rationale for lighter rules on social media if consistency with print/web standards is important for system integrity.	FSC will weigh whether the special conditions offered to social media are justified or if they cause a potential risk to the scheme's integrity.
2	Stakeholders request specific examples to clarify compliance, for example: <ul style="list-style-type: none"> <li>- Can a licence code in a post suffice?</li> <li>- Can a link in the bio be considered compliant for all posts?</li> </ul>	FSC will develop additional guidance with practical examples on how to correctly promote on social media with FSC trademarks.

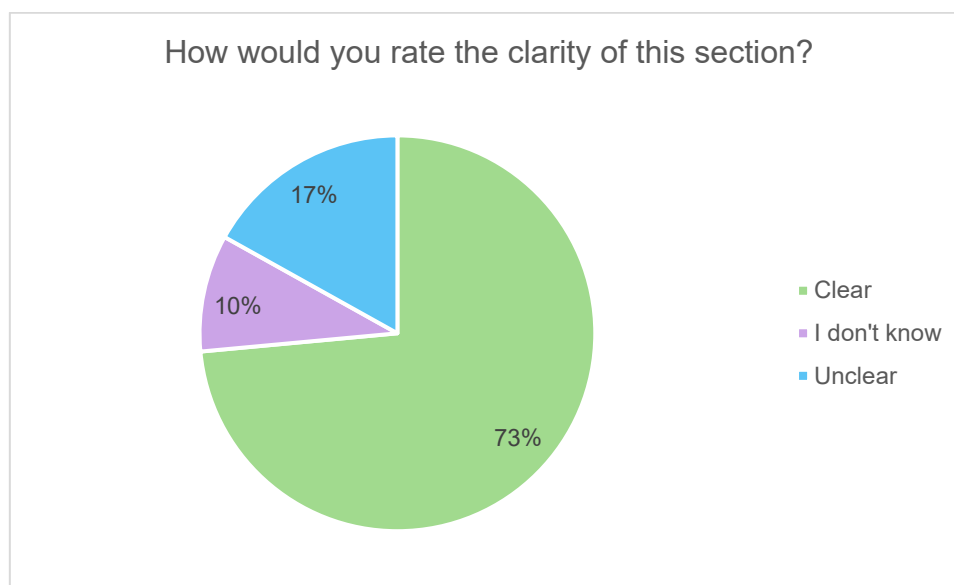
- 
- Are stories, reels, or reposts covered by the same rules?
- 

## Topic 9: Promotion on e-commerce

**Question 25. How would you rate the clarity of this section?**

### Quantitative results

73% of stakeholders regarded the new section as clear. However, 17% considered that additional guidance and clarity could be beneficial.



### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	FSC should clearly differentiate between product title and product name, with examples to prevent misinterpretation.	The draft provided a different definition for product title in the context of e-commerce. However, FSC understands that this may lead to confusion. Hence, additional guidance with practical examples will also be provided to ensure clear application of this section.

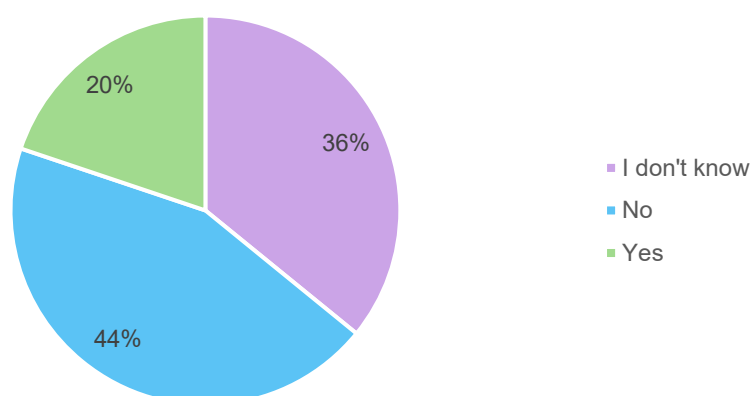
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**Question 26. Do you think any relevant requirements for using the FSC Trademarks on e-commerce are missing?**

### Quantitative results

A significant number of stakeholders (44%) concluded that the new requirements are sufficient. Only 20% participants considered that there are still requirements missing, and a noteworthy 36% of participants could not say at this time. This might indicate that a considerable group of stakeholders is still in the process of getting familiar with the promotion of FSC certified products on e-commerce platforms.

Do you think any relevant requirements for using the FSC Trademarks on e-commerce are missing?



### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	<p>Certificate holders express limited control over how their products are marketed by e-commerce platforms or sellers.</p> <p>This raise concerns over accountability for non-compliant listings or incorrect FSC references made by others.</p>	<p>The Trademark Standard applies to certificate holders only. The use that third parties make of FSC trademarks is indeed a valid concern which FSC must address as part of the protection of the integrity of the certification scheme, although not through creating requirements but by acting against these unauthorized uses. The feedback will be shared with the relevant units across FSC.</p>
2	<p>Stakeholders question why an exemption exists for using trademark symbols online.</p> <p>Others argue the symbols should be retained to avoid dilution of trademark authority, especially since e-commerce content is easily replicated or reused.</p>	<p>The reason why there is an exemption for not using trademark registration symbols on online marketplaces is that many of them do not support their use. The current version of the standard has an interpretation allowing the omission of the use on certain e-commerce platforms; however, this differentiation was not justified, hence it has been extended to all platforms.</p>
3	<p>Stakeholders want to be assured that photos of labelled products can be used without additional trademark approvals.</p>	<p>FSC will provide guidance about how to correctly use photos of labelled products on e-commerce platforms.</p>

**Question 27. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	<p>Many stakeholders oppose making promotional elements compulsory per listing. Concerns include:</p>	<p>FSC will address these concerns in collaboration with the Working Group. However, it is important to emphasize that the mandatory promotional elements</p>

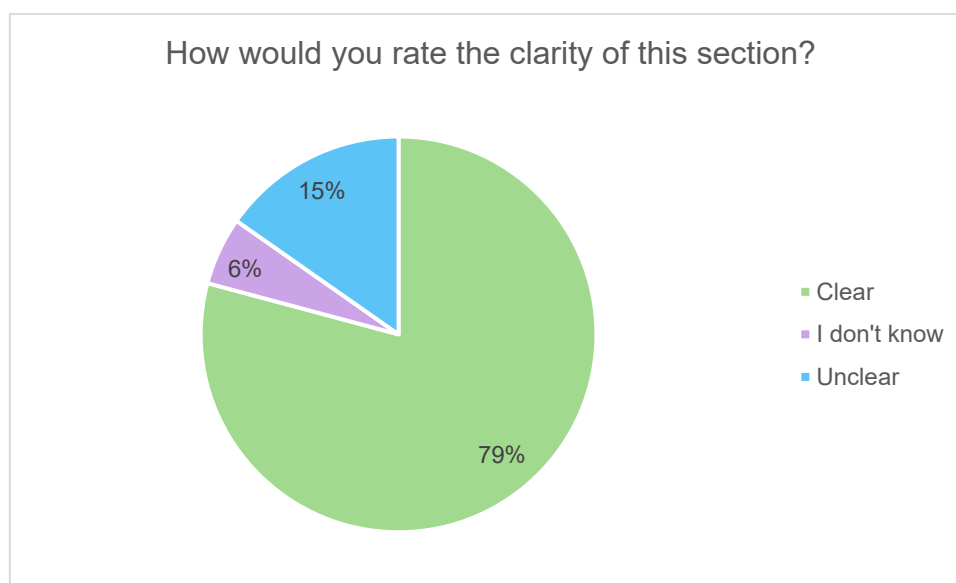
- 
- Technical and space constraints (e.g., ERP systems with short product title fields).
  - Redundancy when multiple certified products appear together.
  - SEO interference due to forced repetition of "FSC" or "certified" in titles.
  - Increased workload and risk of non-compliance for small and mid-sized businesses.
- play a key role in ensuring end-consumers receive the minimum required information about FSC-certified products and/or the FSC certification.
- 

## Topic 10: Graphic rules for FSC on-product labels and FSC logo

**Question 28. How would you rate the clarity of this section?**

### Quantitative results

This section was rated as clear (79%), while 15% of respondents offered suggestions on how to improve its clarity. It is worth mentioning that most of the feedback regarding this section refers to the rules per se and not to the wording.



### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Confusion over whether organizations must use FSC green or black -8.1-, or whether other colours may be used freely.	As stated in the verbal forms, "should" implies a recommendation instead of a strict requirement. As such, this section does not forbid other colours from being used. Additional guidance will be provided in this respect.

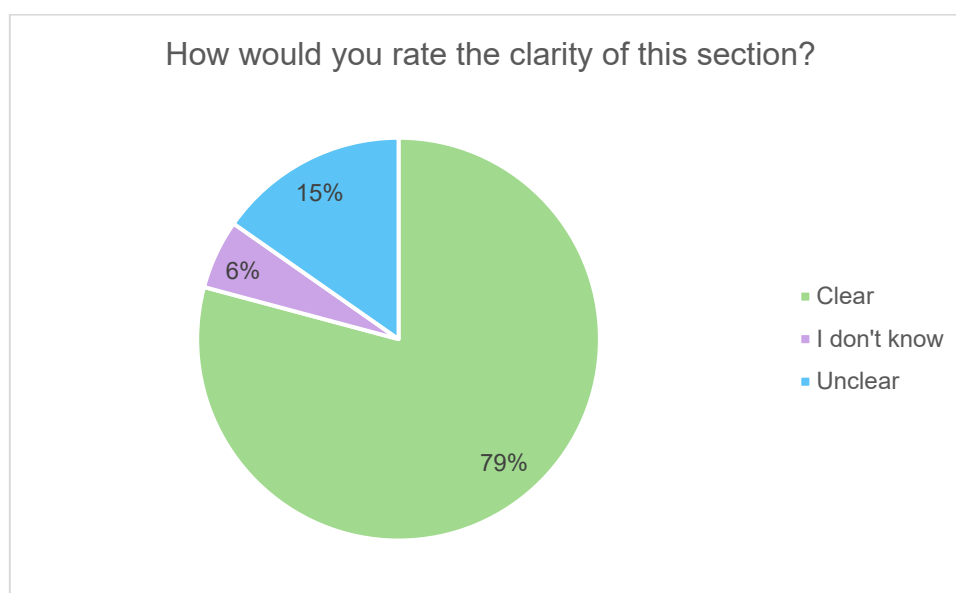
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2	Clause 8.2 is not clear to what is actually permitted and if a technical justification is required for using other colours.	FSC will work on improving the wording of this clause so it clearly reflects the intention of the WG: this is to allow any colours as long there is enough contrast with the background to make the elements legible.
3	Digital uses were not addressed in terms of pixels.	FSC will propose a clause regulating this aspect.
4	Clause 8.5 requires certification bodies to subjectively evaluate what “technically impossible” is unless guidance is provided.	FSC will provide additional guidance on what cases can be considered as technically impossible. Including a definition will also be considered.

**Question 29. Do you agree that allowing more flexibility in the colour of the FSC labels and FSC logo will effectively simplify processes and encourage use of the trademarks?**

### Quantitative results

The majority of stakeholders agree on removing strict rules on colour options when using the FSC Trademarks. Only 15% were against the proposal.



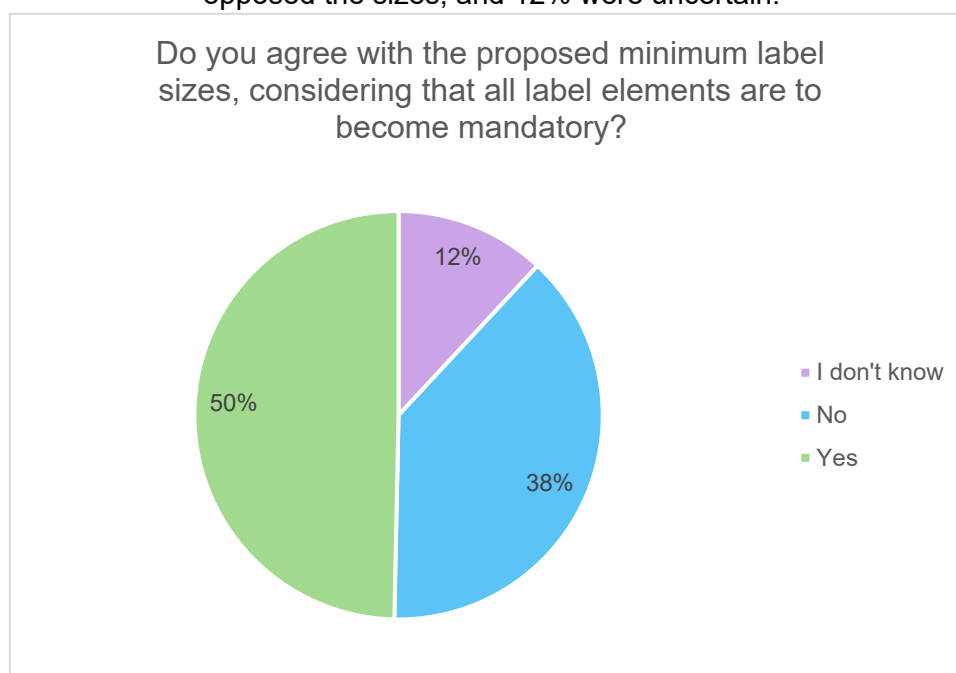
### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Risk to brand consistency: A lack of fixed color guidance may dilute the identity of FSC, particularly in consumer-facing contexts.	In making this decision, FSC carefully balanced the risk to brand consistency with the need for greater flexibility and ease of use for certificate holders. This approach aims to support wider and more effective use of the FSC label. By enabling adaptability, FSC seeks to enhance label uptake while maintaining its core identity.

**Question 30. Do you agree with the proposed minimum label sizes, considering that all label elements are to become mandatory?**

## Quantitative results

Stakeholder opinions on this question were divided: 50% agreed with the proposed changes, 38% opposed the sizes, and 12% were uncertain.



## Qualitative results

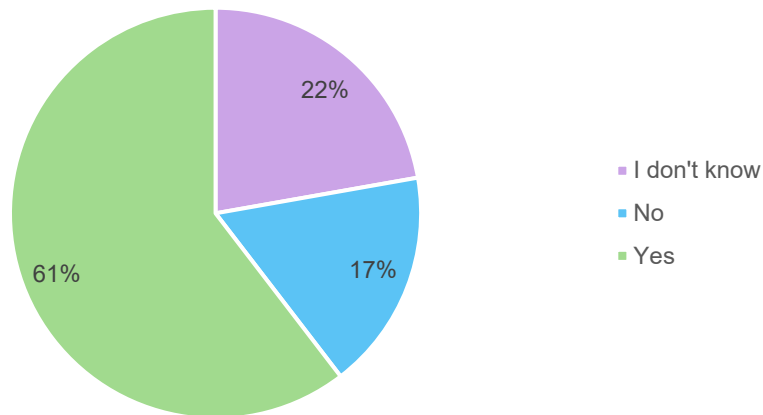
Nr.	Stakeholder Feedback	FSC response
1	Small packaging and products won't be able to accommodate the proposed size.	FSC is analysing whether the label size can be reduced and the legibility maintained. A proposal will be submitted to the WG to reduce the size.
2	Stakeholders argue that legibility, not fixed mm dimensions, should guide the minimum size. Many note that modern printing technology allows smaller labels to remain perfectly readable.	FSC aims to ensure that its labels remain visible, even on small products. In line with ISEAL best practices, providing a minimum size is essential.
3	The so-called mini-label (label without optional elements) is widely used and changes will have an impact on designs that will lead to high costs.	We consider this topic covered under question 10.

**Question 31. Do you agree that removing the specific height measurements surrounding the label, FSC logo or 'Forest For All Forever' mark will encourage the use of the trademarks by certificate holders?**

## Quantitative results

A large number of stakeholders (61%) agreed with the removal of specific height measurements. 17% of them highlighted important arguments against such proposal.

Do you agree that removing the specific height measurements surrounding the label, FSC logo or 'Forest For All Forever' mark will encourage the use of the trademarks by certificate holders?



### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	The removal is welcomed as a simplification that makes it easier to apply the FSC label within tight design constraints.	FSC acknowledges this feedback.
2	Practical guidance of what exactly constitutes "no contact, no overlap" is required.	FSC will provide guidance with practical examples regarding this clause.
3	Several respondents worry that eliminating spacing standards might lead to cramped or awkward label placements, reducing the perceived credibility of the FSC trademark.	FSC recognizes the concern that removing spacing standards could affect the label's appearance and credibility. However, this must be balanced with the need to offer greater flexibility for certificate holders, particularly to accommodate small products with limited space.

**Question 32. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Stakeholders notice that previous versions (e.g., V2-1) included examples of label formats (e.g. one-line labels when printing is limited), minimum size measurement guides, and border flexibility. These should be reinstated or adapted.	FSC will implement the suggested changes and have visual aids on the minimum size.



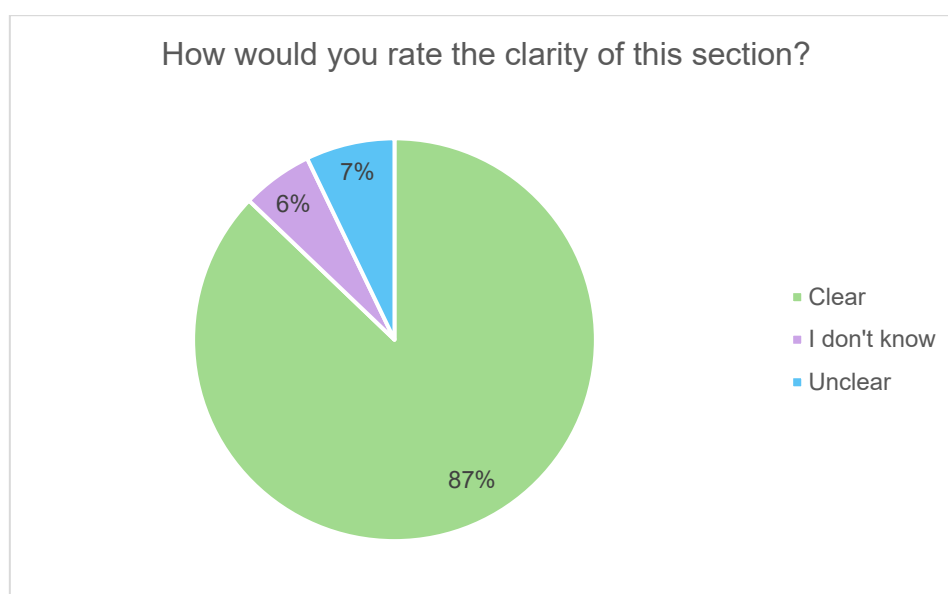
2	Stakeholders ask to retain the flexibility to remove borders if label elements remain intact. Confusion exists over whether a border is now compulsory or not	FSC will provide clarity about this specific issue. It is the objective of the revision process to allow more flexibility on this aspect.
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## Topic 11: Graphic rules for ‘Forests For All Forever’ marks

### Question 33. How would you rate the clarity of this section?

#### Quantitative results

This section was regarded as clear by 87% of the stakeholders. Only a 7% found the section unclear. This was also reflected in the feedback received.



#### Qualitative results

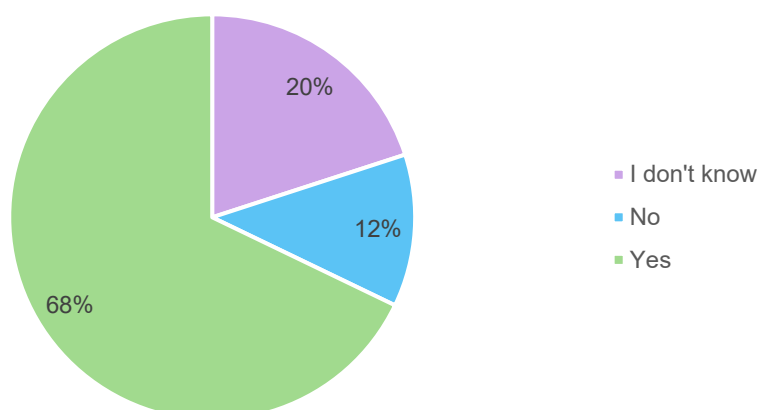
Nr.	Stakeholder Feedback	FSC response
1	There is confusion about whether the measurements refer to height or width.	FSC will implement the feedback into the draft, clarifying that the size refers to the height of the FFAF trademark.

### Question 34. Do you agree that allowing more flexibility in the colour of the ‘Forest For All Forever’ trademarks will effectively simplify processes and encourage their use?

#### Quantitative results

68% of the participants agree that more flexibility on the colours of the FFAF trademarks is actually positive and encourages their use. A small 12% disagree with that proposal, and a considerable 20% indicated that they did not know, potentially due to the lack of current use.

Do you agree that allowing more flexibility in the colour of the 'Forest For All Forever' trademarks will effectively simplify processes and encourage its use?



## Qualitative results

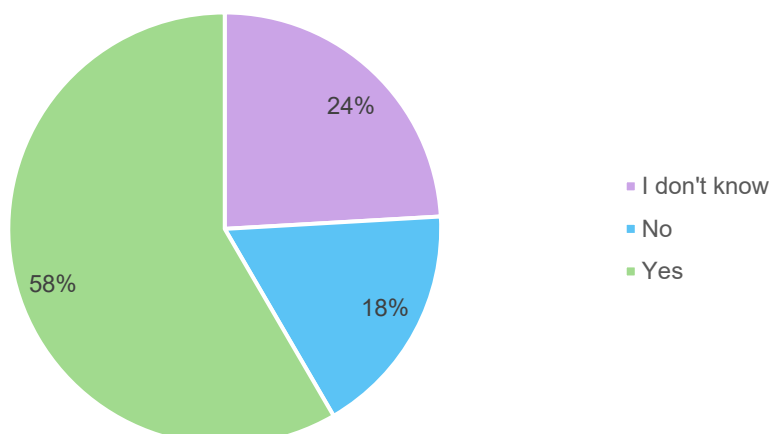
Nr.	Stakeholder Feedback	FSC response
1	Many CHs do not use the Forests for All Forever trademarks, particularly in physical packaging or on-product uses. Promotional use is more likely, but even then, the standard FSC logo is preferred.	FSC takes note of this comment.
2	Some stakeholders support color flexibility as it may increase usability and alignment with brand aesthetics. Others raise concerns about weakening global brand recognition, especially if the FSC logo or marks appear in non-standard colors.	We consider this topic regarding brand identity on question 29.

**Question 35. Do you agree with the minimum size of 6mm for the 'Forest For All Forever' trademarks as described in section 9.2?**

## Quantitative results

In a similar fashion to previous questions in this section, there is a general positive perception regarding the proposed graphic rules for the FFAF trademark. 58% of participants agreed with the size, 18% disagreed, and 24% were undecided, once again reflecting the limited use of the FFAF trademark.

Do you agree with the minimum size of 6mm for the 'Forest For All Forever' trademarks as described in section 9.2?



### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Stakeholders broadly support requiring legibility over fixed dimensions. While many accept the 6 mm figure, they emphasize that clarity, usability, and flexibility are more important than rigid sizing.	FSC will discuss this feedback with the WG. It is important to keep in mind that a minimum size is required from a brand identity perspective, and can be useful for small and medium organizations that are starting to use the FSC label on their products.
2	Limited packaging real estate continues to be a dominant concern, especially for small products, labels, stickers, cosmetics, and narrow carton panels.	FSC will consider the different minimum sizes provided in the feedback to ensure adaptability.

**Question 36. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Multiple stakeholders object to the removal of the FFAF full mark (including silhouettes). For some, this was the preferred or most commonly used version due to its design appeal or effectiveness in communication.	FSC appreciates this feedback. However, the decision to phase out the FFAF with animal silhouette was adopted in 2023, and it has been widely communicated since.
2	Stakeholders note that restricting FFAF language versions by country is	FSC works to ensure that the FFAF mark is available in all languages and countries where possible, while

impractical, particularly in multilingual countries.

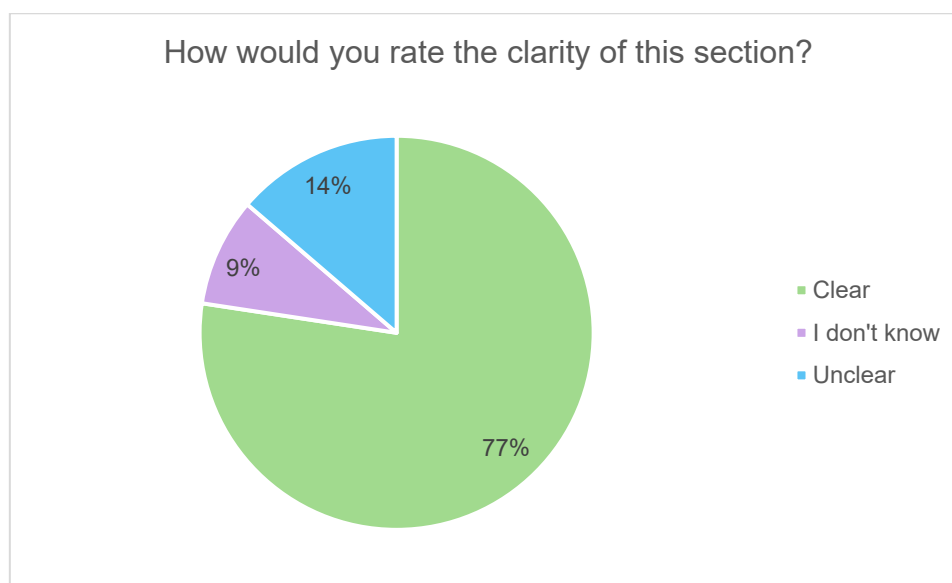
also noting that the relevant clearance process is time-consuming, as well as the registration process.

## Topic 12: FSC QR Label

### Question 37. How would you rate the clarity of this section?

#### Quantitative results

There was a positive acceptance of the QR Label section. 77% participants found it clear, and only 14% proposed improvements on the wording.



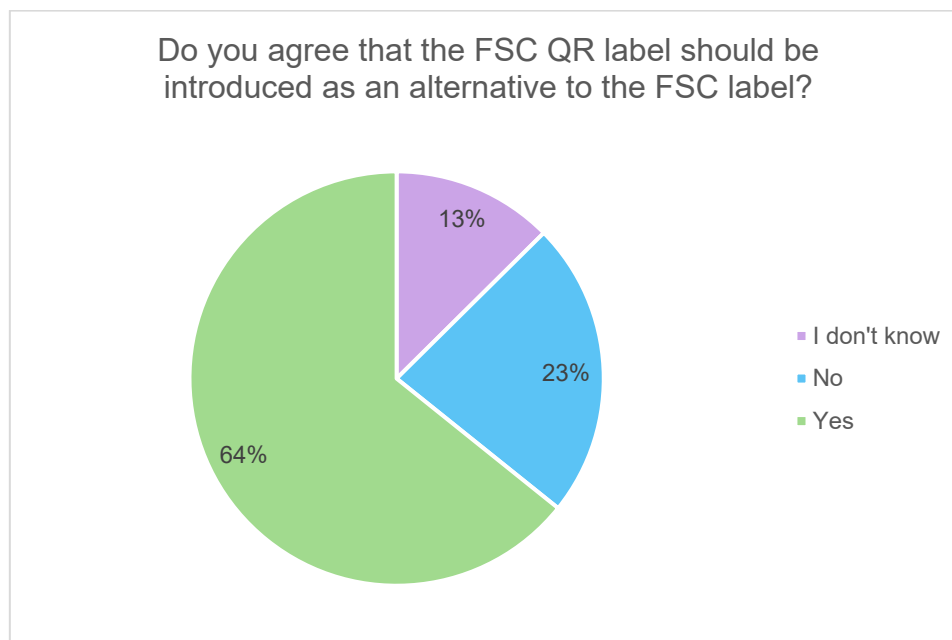
#### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Stakeholders are unsure whether the QR label is a replacement for or an addition to the standard on-product label.	The FSC QR label is proposed as an alternative to the existing FSC labels. This meaning that the certificate holders can choose to use either one of the existing labels or the QR one. FSC will ensure this is clear in the standard.
2	A major concern is who controls the QR code destination page (FSC, CB, or CH).  Stakeholders question how URLs are generated, updated, and whether they will remain functional over time.	FSC will implement the QR label from a technical perspective. This includes the QR label generator with product-tailored information, as well as the landing/destination website, which will be hosted by FSC. This will ensure that the QRs will remain functional and always directing consumers to the FSC dedicated website.
3	There is confusion about the colours in which the QR can be used.	FSC will allow a similar degree of flexibility regarding the colours in which the certificate holders may want to use the QR label. Here, the threshold of acceptance is that the QR is scannable by a device, which is an objective criterion. Additional guidance will be provided to enhance clarity.

**Question 38. Do you agree that the FSC QR label should be introduced as an alternative to the FSC label (For clarity, the FSC QR label will not replace the FSC labels and is not intended to be used in addition to existing labels)?**

### Quantitative results

Most of the participants agreed that the FSC QR label should be an alternative to the existing FSC labels. A significant 23% disagreed and only 13% were undecided.



### Qualitative results

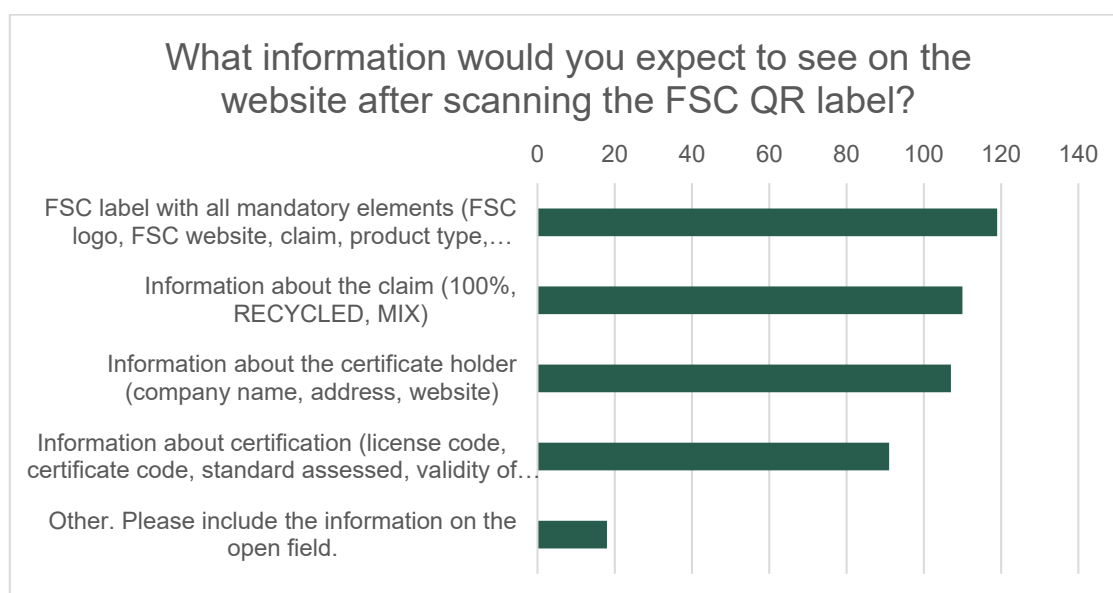
Nr.	Stakeholder Feedback	FSC response
1	Concern over visibility and brand recognition.	FSC acknowledges that the introduction of the new QR label represents a shift in how we present ourselves in the market, but it is a necessary step to keep pace with technological advancements and remain relevant. FSC is also aware that this change may influence how consumers and other stakeholders perceive our labels; however, we will ensure that the FSC logo remains clearly visible across all label formats.
2	As an alternative, the QR label implies an increased burden for the certification bodies, as they will have to scan the QR code, increasing the time that they need to allocate to verify a regular label.	FSC has taken note of this feedback and will discuss it together with the WG.
3	Several stakeholders raise compliance risks under anti-greenwashing legislation if QR labels hide essential information.	FSC takes note of concerns and informs that it is working closely with independent third-party legal counsel to ensure compliance with anti-greenwashing legislation.
4	The QR label should be an addition to the existing label to ensure its full compliance.	The QR label is intended as an alternative solution to address space limitations, engage a broader consumer audience, and position FSC at the

forefront of technological innovation in sustainability labelling. One of the key findings from this report is that certificate holders face challenges fitting the FSC label on their products. Introducing the QR label as an additional requirement may further discourage its use.

**Question 39. What information would you expect to see on the website after scanning the FSC QR label? Select all that apply.**

### Quantitative results

It is evident that the stakeholders wish to see more product-specific information rather than information about the certificate holders themselves, or the scope of their certification. 120 participants considered that the FSC label elements are the most important aspects for consumers to read on the landing site of the QR label.



### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Additional product information regarding the product origin, supply chain data, impacts, and sustainability metrics can help the QR to become a trusted gateway to verified product-level information, increasing transparency, consumer trust, and engagement with FSC values.	FSC agrees with this feedback. The QR label has the potential to make available key information that otherwise would be impossible to fit in the traditional label.

**Question 40. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

## Qualitative results

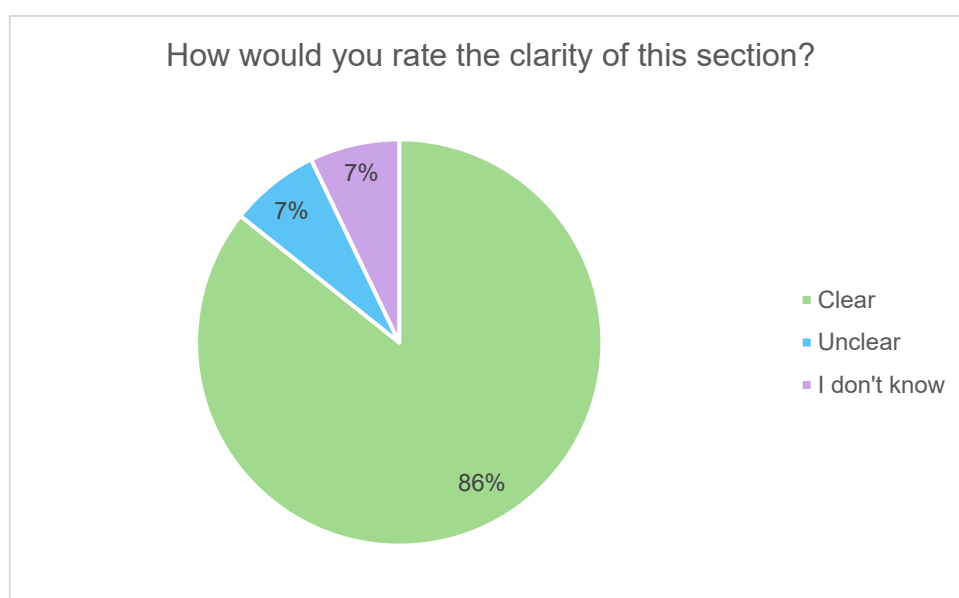
Nr.	Stakeholder Feedback	FSC response
1	Minimum size might be too large for small packaging and products.	FSC will review with the WG the proposed minimum size whilst ensuring that the QR label can be scanned based on industry best practice.
2	The QR label should also be available as a tool for promotion, and not only for labelling.	For now, the QR label remains to be used exclusively on products. FSC will monitor its use and will consider other aspects accordingly.

## Topic 13: Restrictions on using FSC trademarks

### Question 41. How would you rate the clarity of this section?

#### Quantitative results

A convincing 86% of participants found the section clear. Only 7% found it confusing and the other 7% did not decide for any of the other options.



## Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Some restrictions (especially 11.1(b) and 11.5(c)) are seen as non-auditable because they are subjective or rely too much on interpretation.	FSC will address the feedback with the WG to redraft these restrictions into objective requirements
2	This clause is flagged as inconsistent with 8.7, where the term "exclusion zone" is not used or defined. Stakeholders propose replacing it with more consistent, descriptive language, e.g., "no overlap or contact."	The previous requirement on the exclusion zone has been redefined but not entirely removed. FSC will amend this section to ensure it refers to the requirement in clause 8.7.
3	Additional examples can be helpful for users of the standard. They should	FSC will provide the requested additional guidance.

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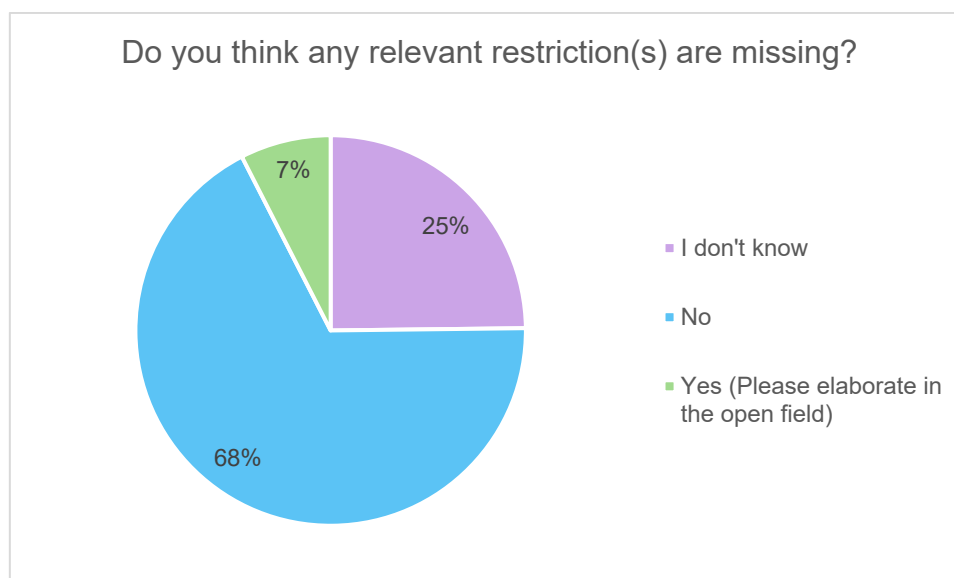
include illustrative dos and don'ts or mockups.

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#### Question 42. Do you think any relevant restrictions are missing?

##### Quantitative results

68% of the stakeholders indicated that no additional restrictions should be included in the standard. A minor 7% proposed new restrictions and 25% did not provide additional input.



##### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	QR label specific restrictions are missing.	FSC will analyse if additional restrictions are indeed required. Nevertheless, besides from the graphic rules, FSC wants to allow flexibility on the usage of the QR label.
2	Restrictions for using certain FSC trademarks when promoting CW.	FSC will include an explicit restriction on promoting CW with some FSC trademarks.
3	'Empty certificates' should not be allowed to promote themselves with the FSC trademarks.	The so-called empty certificates refer to certificate holders who do not actively sell FSC-certified products. While FSC recognizes the stakeholders' perspective against this practice, it is important to keep in mind that many certificate holders only sell certified products "upon request", which ultimately means that they need to advertise that they are able to provide certified material and products. FSC considers that barring these certificate holders from using the trademarks would be counterproductive to the goal of increasing the uptake of FSC-certified products. FSC will discuss this aspect with the WG. In taking a decision, the WG needs to balance the integrity of the FSC system with the reality that some certificate holders sell certified products only "upon request," and therefore must be able to



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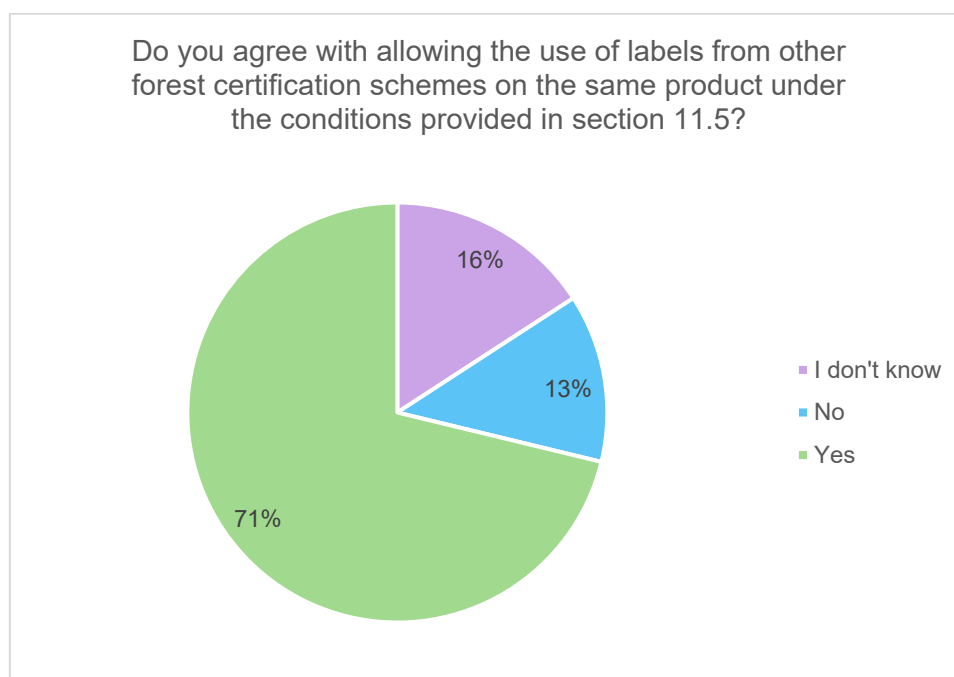
communicate their capability to supply FSC-certified materials and products.

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**Question 43. Do you agree with allowing the use of labels from other forest certification schemes on the same product under the conditions provided in section 11.5?**

### Quantitative results

71% of stakeholders welcomed the removal of the dual-labelling restriction. 16% claimed that they do not have a stance regarding the proposal, and only 13% consider it better to maintain the restriction.



### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Clauses 11.5(b) and (c) are seen as vague, open to interpretation, and difficult to audit. Phrases like “imply equivalence” or “disadvantage the FSC label” are described as too subjective and dependent on intent or perception.	FSC will establish clear and objective criteria to define which cases of dual labelling are not authorized. The important principle is to avoid the FSC label from being misrepresented when using other sustainability labels of other forestry certification schemes.
2	There is strong demand for concrete examples of: <ul style="list-style-type: none"><li>- Permitted vs. prohibited co-use of trademarks</li><li>- Acceptable vs. misleading claims</li><li>- Good and bad visual layouts</li></ul>	FSC will provide clear guidance on how to identify incorrect uses of the FSC trademarks in dual labelling instances.

**Question 44. Please share any additional comments on the section. If applicable, please refer to the specific section or clause your comments relate to.**

## Qualitative results

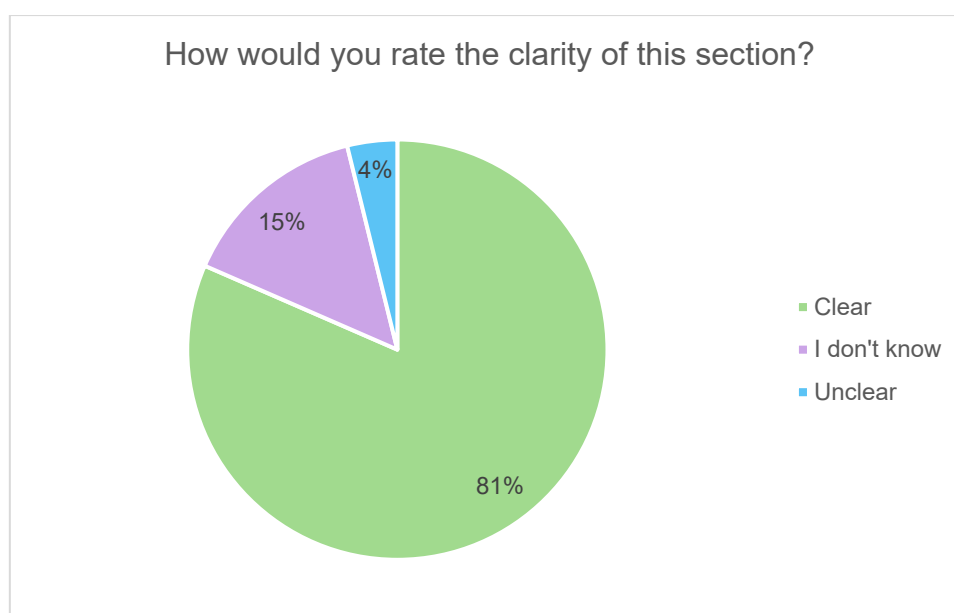
Nr.	Stakeholder Feedback	FSC response
1	The restriction in clause 11.1 e) about using FSC as a noun is unclear and should be removed.	FSC acknowledges the feedback provided and will discuss with the WG the removal of the word “noun” while keeping the word “verb”.

## Topic 14: Annex A – Trademark Use Management System (TUMS)

### Question 45. How would you rate the clarity of this section?

#### Quantitative results

This section was considered clear by a large majority of 81%. Only 4% of the participants deemed it unclear and proposed changes.



## Qualitative results

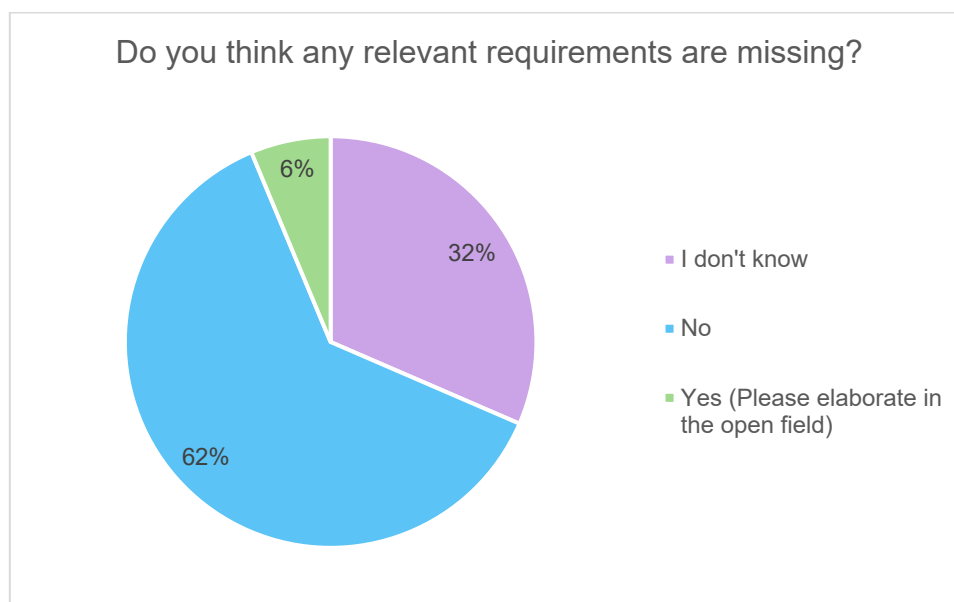
Nr.	Stakeholder Feedback	FSC response
1	Clauses A2 and A7 both refer to "Section 3", but it's unclear whether this refers to Section 3 of the main standard or Annex A.	FSC will introduce an additional level of detail in the cross-reference in the annexes to ensure it is clear to which clause they refer.
2	Current wording suggests TUMS is only applicable to on-product use.	The TUMS is meant to be applicable for both on-product and promotional uses of the FSC trademarks. FSC will improve the wording to ensure clarity.
3	The distinction between “Management Representative” and “Trademark Controller” is not clearly defined.	FSC will improve the information on the roles and responsibilities of the representatives and controllers.

4	Stakeholders request clear timelines for the voluntary suspension of TUMS	FSC will specify a timeline for notifications to avoid confusion and disputes.
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#### Question 46. Do you think any relevant requirements are missing?

##### Quantitative results

Most of the participants find the requirements for implementing a TUMS sufficient. However, 32% were uncertain, and 6% proposed additional requirements.



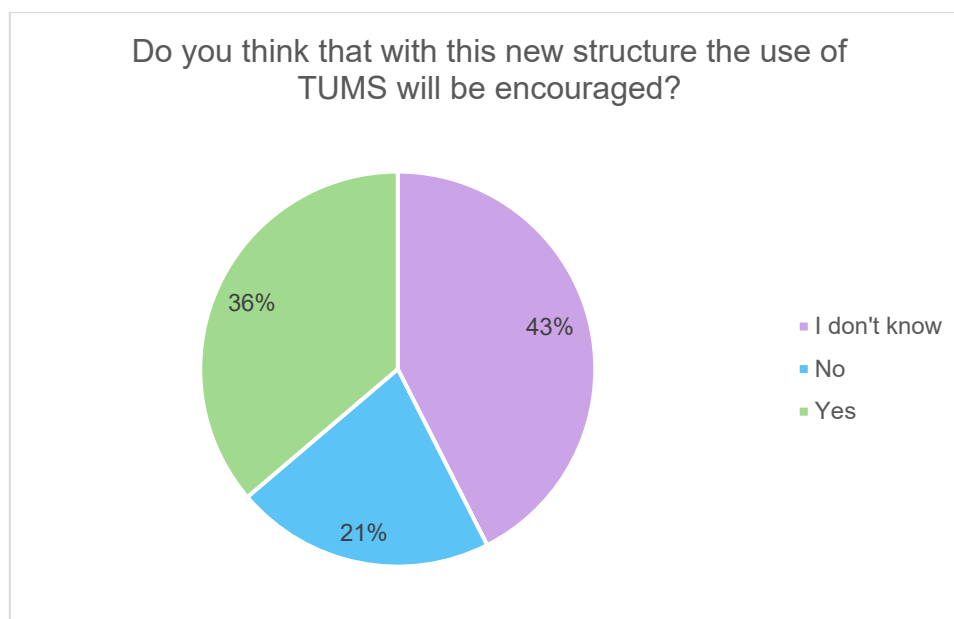
##### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	<p>Many stakeholders request the allowance of multiple or backup Trademark Controllers within an organization.</p> <p>This is especially important for large companies, or to account for vacations, turnover, or leave of absence.</p>	FSC will discuss this feedback with the WG to allow the requested flexibility.
2	<p>More specific requirements for training will help certificate holders to adopt the TUMS.</p> <p>Also, stakeholders considered that there is currently no clear requirement for periodic refresher training, but many believe it should be integrated.</p>	<p>FSC will provide more specific rules regarding which trainings are deemed sufficient to implement the TUMS.</p> <p>As for the periodic retraining, FSC considers that this won't be required as long as the use continues to be correct and accurate, and as long as there are no major changes in the trademark rules or changes of staff.</p>

**Question 47. Do you think that the new structure of the Trademark Use Management System (TUMS) will encourage certificate holders to adopt the system and reduce the need for the certification body (CB) approval for each trademark use?**

## Quantitative results

The view from the participants is divided regarding the impact of these new requirements on implementing a TUMS. The largest number of participants (43%) refrained from sharing their opinion, while 36% were positive that the TUMS implementation would increase. A minor 23% do not believe that the new structure will encourage certificate holders to obtain the TUMS.



## Qualitative results

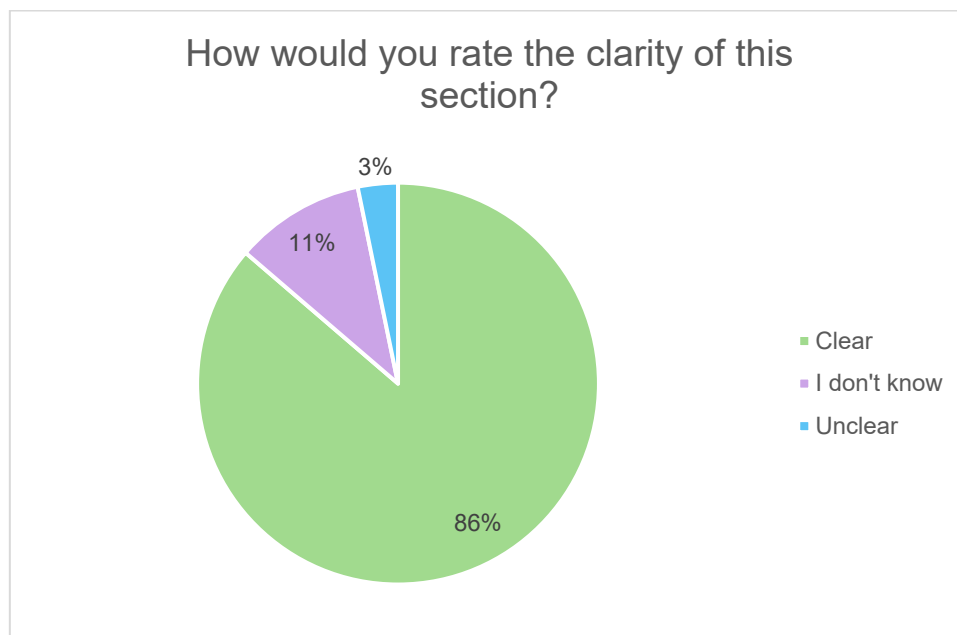
Nr.	Stakeholder Feedback	FSC response
1	<p>Despite its efficiency, most certificate holders still prefer CB-led approvals due to:</p> <ul style="list-style-type: none"><li>- Risk of errors/liability</li><li>- Lack of clarity</li><li>- Changing interpretations by CBs</li><li>- High complexity</li></ul>	<p>FSC acknowledges the feedback received. However, it must be mentioned that implementing a TUMS does not automatically relieve the CB from guiding the correct use of the FSC trademarks. Certificate holders can still obtain the approval from their CB in complex cases or cases of doubt. FSC will consider whether adding a clarification note in that sense may provide more certainty to the use of the TUMS.</p>

## Topic 15: Annex B – Group and Multisite

**Question 48. How would you rate the clarity of this section?**

### Quantitative results

86% of participants indicated that this section is clear. Only 3% disagreed, while 11% were uncertain.



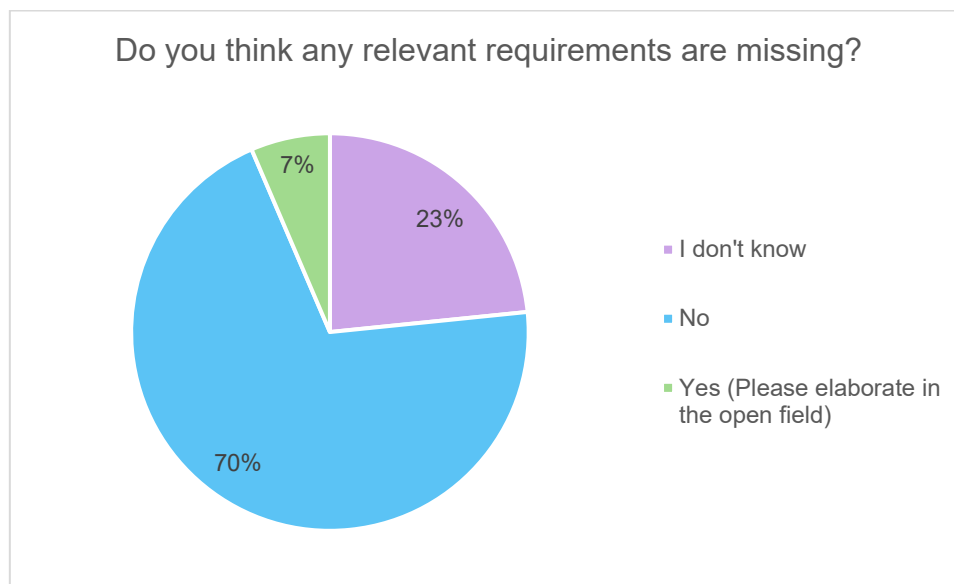
### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Stakeholders recommend aligning terminology in Annex B (and related clauses) with existing Chain of Custody (CoC) standards, particularly: using "central office" and "participating sites" as defined in FSC-STD-40-003 instead of introducing new terms like "group entity," "administrator," or "members."	FSC will ensure alignment between the terms defined in the relevant CoC standards.
2	Additional clarity on how the TUMS operates for Group and Multisite certificates.	FSC will provide explicit rules for this topic or additional guidance, accordingly.

### Question 49. Do you think any relevant requirements are missing?

#### Quantitative results

The majority of respondents (70%) believe no relevant requirements are missing from the draft standard. A significant portion (23%) was unsure whether anything was missing. Only a small minority (7%) explicitly felt that requirements were missing.



### Qualitative results

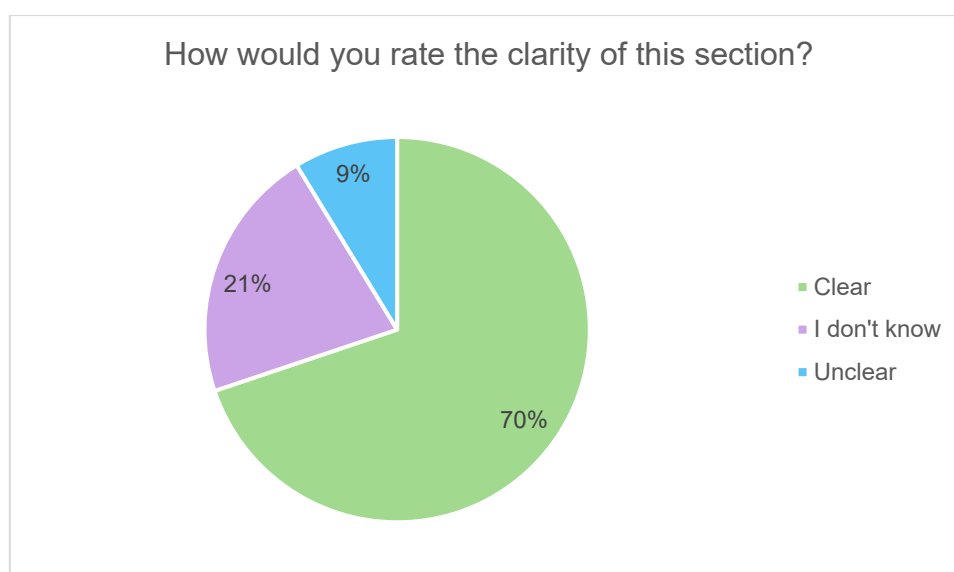
Nr.	Stakeholder Feedback	FSC response
1	Motion 55/2021 does not seem to be implemented in the draft.	FSC acknowledges that Motion 55 has not been implemented in the current version of the standard. Once the work on Motion 55 is finalized by FSC, a relevant advice note will be released, as needed.

## Topic 16: Annex C – Project Certification

### Question 50. How would you rate the clarity of this section?

#### Quantitative results

A majority of stakeholders (70%) considered that the Annex for project certification is clear. Only 9% suggested that the clarity of this section could be improved.



### Qualitative results

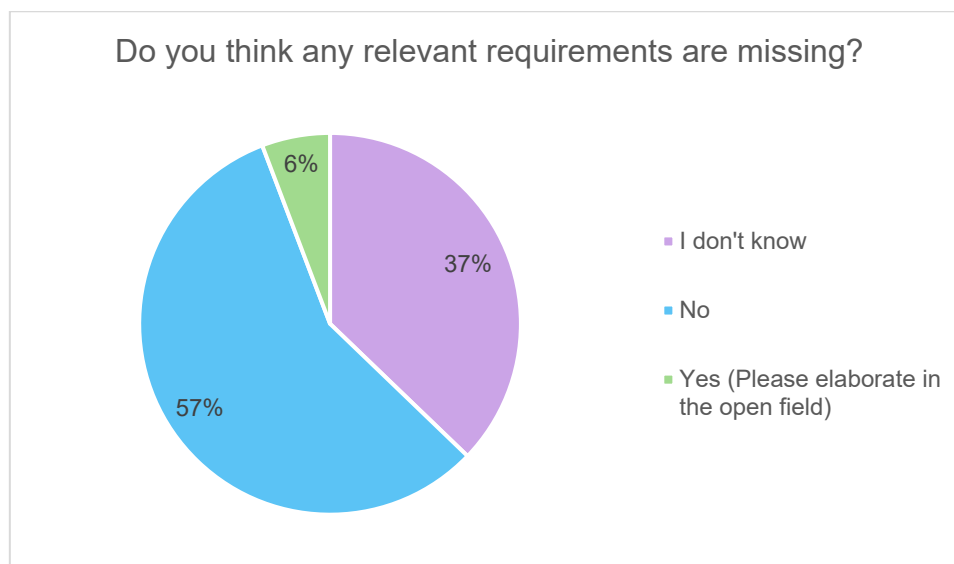
Nr.	Stakeholder Feedback	FSC response
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<p><b>1</b> Stakeholders are unsure what "expiry" means, especially for one-time projects. Is there an "expired" status or a defined end date for such certificates?</p> <p>This could deter uptake of FSC project certification, particularly in construction, if companies can't talk about certified buildings long-term without renewing a promotional licence.</p>	<p>FSC will analyse this feedback with the WG, and will propose to add a definition of the different statuses for project certification, in alignment with the relevant FSC standards.</p>
<p><b>2</b> Clause 6 differentiates between using logos and text-based trademarks based on whether the FSC-certified input reaches 50%.</p> <p>Stakeholders ask:</p> <ul style="list-style-type: none"> <li>- What does the 50% refer to? The project as a whole? Specific materials?</li> <li>- Why are logos allowed only over 50%, but text (e.g., "FSC" or "Forest Stewardship Council") allowed under 50%?</li> <li>- This division feels arbitrary, unclear, and lacking logic.</li> <li>- Many ask for higher thresholds (e.g., 60–70%) if a threshold is to remain at all.</li> </ul>	<p>FSC will align on this feedback with the relevant units on FSC in charge of defining the thresholds for project certification.</p> <p>In addition, FSC will provide additional clarity regarding what percentage the requirement refers to.</p>

## Question 51. Do you think any relevant requirements are missing?

### Quantitative results

57% of participants were satisfied with the requirements for using the trademarks for project certification. 6% asked for more requirements, and 37% did not provide an opinion on this topic



## Qualitative results

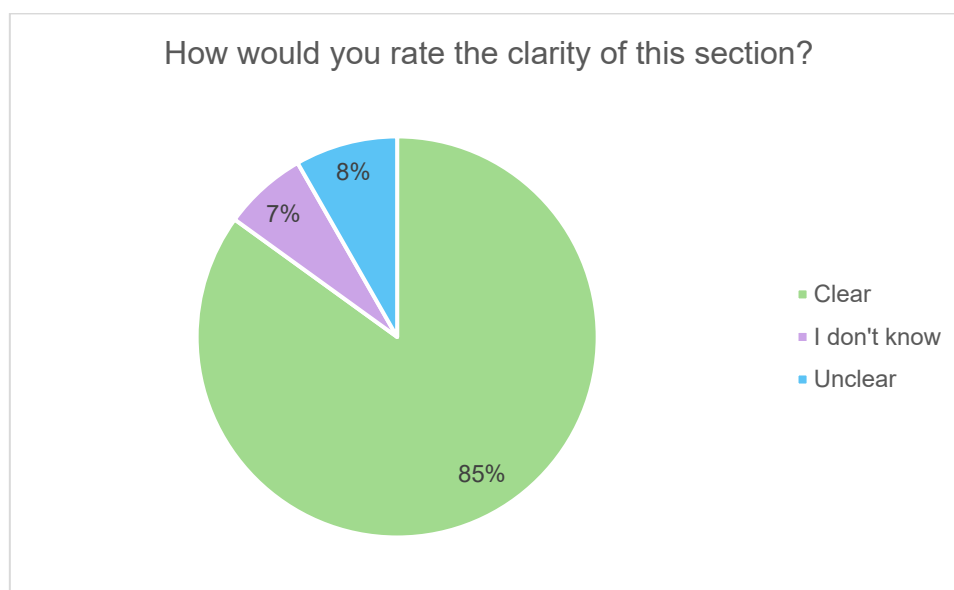
Nr.	Stakeholder Feedback	FSC response
1	Stakeholders request the explicit inclusion of definitions for one-time project certification and ongoing project certification.	FSC will provide the requested definitions to enhance the clarity of this Annex.
2	Guidance and practical examples on how to correctly promote project certification would definitely help to understand the requirements.	FSC will provide additional guidance with real cases, indicating what is allowed and what is not.

## Topic 17: Annex D – Promotional Statements

### Question 52. How would you rate the clarity of this section?

#### Quantitative results

A vast number of stakeholders found the Annex D clear. Only 8% considered that clarity should be improved and 7% did not provide any concrete feedback.



## Qualitative results

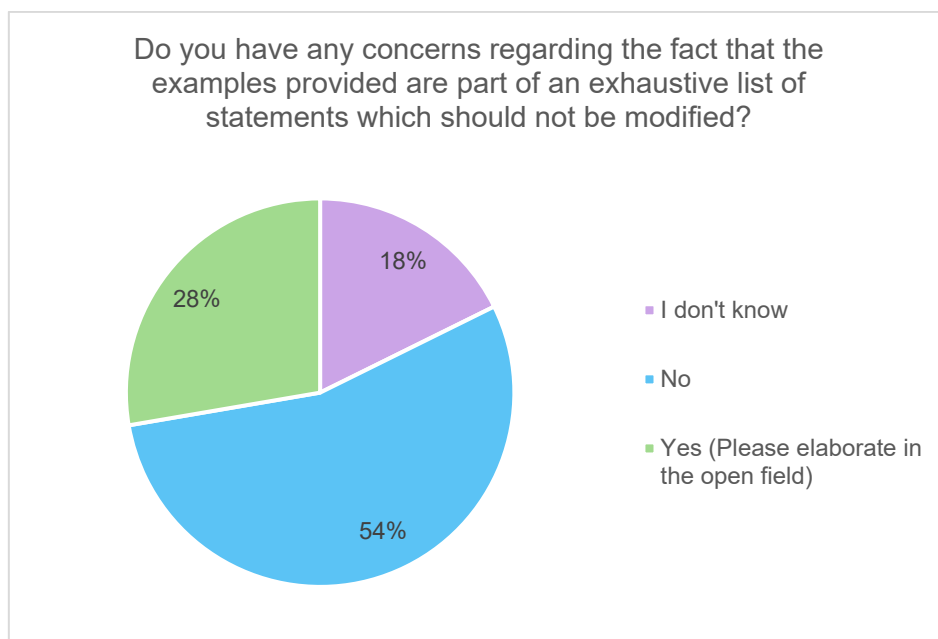
Nr.	Stakeholder Feedback	FSC response
1	<p>Multiple comments indicate confusion over whether the listed statements in Annex D are:</p> <ul style="list-style-type: none"> <li>- A mandatory and exhaustive list</li> <li>- Or examples that can be adapted</li> </ul>	<p>The statements were proposed as an exhaustive list. Based on stakeholders' feedback in this document, this aspect will be discussed with the WG.</p>

### Question 53. Do you think any relevant requirements are missing?



## Quantitative results

54% of the participants did not show concerns about the exhaustive nature of the list. 28% raised doubts about this change and shared relevant feedback.



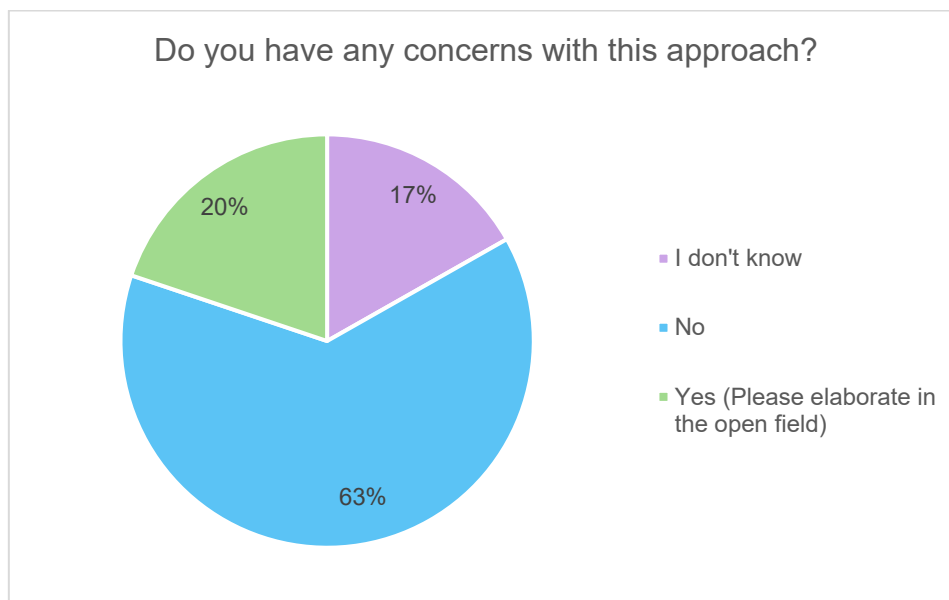
## Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Many certificate holders (CHs) request the ability to adapt, shorten, or customize promotional statements. They argue that minor modifications such as changing the word “product” to “paperboard” or altering tone for cultural/market fit should be permitted if the meaning remains intact.	FSC will analyse this feedback and will discuss it with the WG. The aim here is to ensure that every statement that accompanies the use of the FSC trademarks is accurate, relevant, clear, and verifiable.
2	There is strong demand for shorter, more consumer-friendly and media-appropriate statements. Existing phrases are seen as overly technical, lengthy, or irrelevant to specific contexts (e.g., labels on toys, space-limited formats).	FSC acknowledges this feedback and will discuss it with the WG. In light of growing scrutiny from consumers and regulatory bodies regarding greenwashing, it is essential that claims made by certificate holders are carefully evaluated. As such, the proposed statements have been developed with legal compliance as a key guiding principle.

**Question 54.** In the header of the section, we are proposing a mechanism for requesting additional promotional statements to be added to the FSC Brand Hub. Do you have any concerns with this approach?

## Quantitative results

63% of participants did not share concerns over the proposal to increase the number of statements in the FSC Brand Hub. However, a considerable 20% indicated potential challenges of this solution.



## Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	<p>Several stakeholders highlighted the considerable duration for this request to be approved and implemented into the FSC Brand Hub. They foresee that delays will cause:</p> <ul style="list-style-type: none"> <li>- Project bottlenecks</li> <li>- Avoidance of trademark use altogether</li> <li>- Increased cost if reprints or rework are needed</li> </ul>	FSC acknowledges this feedback and will consider whether the proposed solution can adequately address the potential issues flagged.
2	<p>Many stakeholders agree that approved promotional texts should be:</p> <ul style="list-style-type: none"> <li>- Included in future versions of the standard (or annex)</li> <li>- Made publicly accessible - not everyone has access to FSC Brand Hub-</li> <li>- Available for auditors, agents, CBs, and CHs alike</li> </ul>	FSC understands the concern about the publicity of these statements and the potential challenges for users to find them if they are not familiar or do not have access to FSC Brand Hub. In consequence, FSC will discuss with the WG whether there is an alternative solution for making available new promotional statements.

**Question 55. Please feel free to provide additional comments or suggestions on Annex D and the proposed statements.**

## Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	Strong, repeated demand for concise "one-liner" statements	FSC acknowledges this feedback and will assess whether one-line statements can meet the criteria

		for credible claims: accurate, clear, relevant, legally compliant etc.
2	CBs should be able to approve minor modifications.	FSC will study this request, with special consideration to the increased workload that this could represent for CBs.
3	Concern over retroactive non-compliance and cost if previously approved statements become invalid	The statements approved under version 2.1 of the standard will continue to be valid until the end of the transition period.

## Additional feedback

### Question 56. Would you like to provide any other feedback?

#### Qualitative results

Nr.	Stakeholder Feedback	FSC response
1	<p>Repeated concern from companies (especially packaging, printing, and consumer goods) about the transition period:</p> <ul style="list-style-type: none"> <li>- High costs of revising plates</li> <li>- Long design lifecycles (3–10 years for some packaging)</li> <li>- Delayed impact of label changes due to inventories and production cycles</li> </ul> <p>Many organizations emphasize that even 18 months is insufficient; most request 30 months minimum.</p>	FSC acknowledges this feedback and will propose a transition period that addresses the challenges communicated by the stakeholders.
2	A comparison document between the current version and the proposed draft is necessary to understand the changes.	FSC will provide a walkthrough document that compares the existing version, the first draft, and the final draft.
3	A second consultation might be required due to the scale and uncertainty around certain changes.	The revision of this standard follows the FSC procedure for revising normative documents (FSC-PRO-01-001). FSC welcomes the extensive feedback received and is confident that the final version will be able to address the main topics of this report.