

53%

of green claims give vague, misleading or unfounded information 40%

of claims have no supporting evidence

1/2

of green labels offer weak or non-existent verification

230

sustainability labels exist in the EU



Agenda for today



- 1 Context and drivers
- 2 Key findings & decisions regarding FSC marks
- 3 What does this mean for you?
- 4 Q&A



Environmental claims/ anti-greenwashing legislation as a global trend







Empowering Consumer Directive (EmpCo)

Aims to improve consumer protection by encouraging more sustainable consumption patterns and avoiding misleading environmental claims ("greenwashing").



Claims

Sets general requirements on unfair commercial practices, including environmental claims



Sustainability labels

Prohibits
sustainability labels
NOT based on a
certification scheme
and introduces
requirements for
certification schemes



Status

- March 2024 Directive
 published
- 2024-2026 transposition into national laws
- Sept 2026 Directive effective



Our approach

1. INTERNAL ASSESSMENT

An initial assessment was carried out by internal FSC experts to identify potential gaps.

2. EXTERNAL LEGAL REVIEW

A comprehensive review of the FSC's system was undertaken to identify gaps, with a particular focus on environmental claims.

Scope of assessment

TRADEMARK PORTFOLIO





FSC LABELS







FSC PROMOTIONAL DESIGNS



The mark of responsible forestry



We avoid risks by acting now



For FSC

- Strengthens our position as a credible certification scheme
- Legal compliance ensures continued use of the FSC logo & label.

For licence holders

- Increases confidence in FSC system
- Provides assurance that FSC-certified products can continue to be promoted and sold.



Forest For All Forever brandmark – noncompliance breakdown





- Generic claim
- Relation to future environmental performance

European Union (EmpCo)

Ambiguous, no concrete meaning, 'merely' a slogan -> generic environmental claim (prohibited)

Other jurisdictions (AU, CA, CN, CO, SG, UK, US)

Vague or general environmental claim, open to interpretation and scrutiny

Regulatory risk, especially where claims are seen as aspirational, unqualified, or absolute



Phasing out **Forest For All Forever** mark across all licence holders (FM, CoC, PLH)



*FSC International will continue using the FFAF mark





Certificate Holders Normative updates & EmpCo support



FSC-STD-50-001 V3

- Updated guidance document to support the revised Trademark Standard
- Updated e-trainings
- Webinars for CHs
- Robust FSC claims supported by a transparent framework
- FSC Brand Hub updates

EmpCo alignment guidance

- Clear stakeholder communications on risks of using the FFAF mark on the EU market from Sept 2026.
- FSC's **EmpCo alignment quick guide** to help licence holders prepare for Sept 2026
- FSC and EmpCo FAQ for CHs

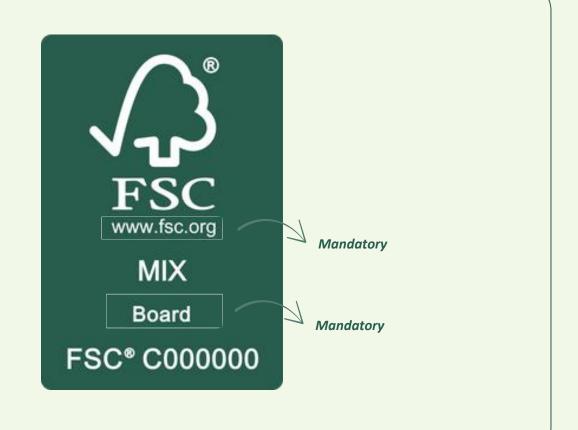


Checklist for labelling



USE THE ON-PRODUCT LABEL WITH UPDATED MANDATORY ELEMENTS IN ALL SITUATIONS

- FSC website address www.fsc.org
- FSC claim e.g. 100%, MIX, RECYCLED
- Product type e.g. Packaging, Board
- FSC licence code



Checklist for labelling





Clarifying statements: When the product type alone does not provide enough clarity, include a statement to specify what the FSC label refers to.

E.g.: The FSC label refers to the copy paper sheets..

The label product type 'Paper' could refer either to the copy paper or the paper packaging, it is unclear.





Checklist for promotional use



OPTION 1 USE THE PROMOTIONAL PANEL DESIGN (ALL MANDATORY ELEMENTS ALREADY INCLUDED)

- FSC website address www.fsc.org
- Promotional text
- FSC licence code



The mark of responsible forestry

Checklist for promotional use



OPTION 2 IF NOT USING THE PROMOTIONAL PANEL DESIGN, INCLUDE ALL MANDATORY ELEMENTS

- FSC trademark
- FSC website address www.fsc.org
- Promotional text
- FSC licence code



1. Promotional 2. Licence code 3. Website text

Delivering value to our licence holders



While we say goodbye to the FFAF mark, we focus on:

Streamlining & innovation 100% Board from wellmanaged forests FSC*C000000

- Introducing the FSC QR label
- TM rules simplifications e.g. colours, spacing, background
- Improved rules with clear guidance
- Tailored claims



- Continue focus on FSC logo as the main element of our brand
- More ready-made materials & campaigns from 2026 (global & local)



- Supporting licence holders to fully leverage their licence
- Training, materials, assets and toolkits



STAY INVOLVED

What can you do?



 Join FSC webinars to understand key changes



 Plan the update and phase out of materials using FFAF and on-product labels without all mandatory elements



CH resources

- Tailored FAQs
- Technical guidance briefs



 Reach out to <u>trademark@fsc.org</u> for any questions or support



