

THIS WEBINAR WILL BEGIN SHORTLY

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



UPCOMING TRADEMARK CHANGES FOR PROMOTIONAL LICENCE HOLDERS (AND NAVIGATING THEM TOGETHER)

November 2025



**FORESTS
FOR ALL
FOREVER™**

Agenda for today



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



CONTEXT AND DRIVERS

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.

An aerial photograph of a dense, dark green coniferous forest. The trees are tightly packed, creating a textured, almost uniform surface of green. In the center-right of the image, a single tree stands out with a bright yellow canopy, providing a sharp contrast to the surrounding dark green. The lighting appears to be coming from the side, casting soft shadows and highlighting the tops of the trees.

KEY FINDINGS AND DECISIONS

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

What are we doing?

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



*FSC International will continue using the FFAF mark

Promotional panel designs – noncompliance breakdown



- Sustainability labels under EmpCo
- Require that compliance with scheme is monitored by competent & independent 3rd party, based on objective procedures.

Criteria to qualify as a sustainability label:

- Graphic design (shape, colour, font, symbols, effects, text etc.)
- Content (wording, colour scheme, ‘environmental’ graphic elements)
- Use/ placement (on the product/ in advertisement)
- Accompanying communication

What are we doing?

Removing the promotional panel design for **Promotional Licence Holders**



A photograph of a young child with brown hair, wearing a grey tank top, peeking out from behind a large tree trunk in a garden. The child is holding black binoculars to their eyes. The garden is filled with lush green foliage and several yellow Black-eyed Susans. In the background, a white picket fence is visible. The scene is captured in a cinematic style with soft lighting.

**WHAT DOES THIS MEAN
FOR YOU?**

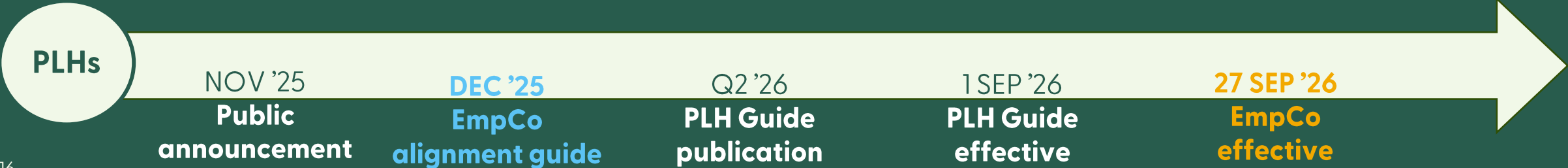
Promotional Licence Holders Requirements update & EmpCo support

Policy and tools

- **Policy revision:** FSC Trademark Use Guide for Promotional Licence Holders, including FFAF and promotional panel removal
- **Updated e-trainings**
- **Webinars for PLHs**
- **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 Sep 2026
- Guidance on updating FSC TM use for PLHs and your suppliers



Aligning your FSC trademark use to EmpCo

1

Remove the FFAF mark from all your promotional materials

> replace it with the FSC logo or another FSC trademark.

2

Remove the promotional panel design from all your promotional materials

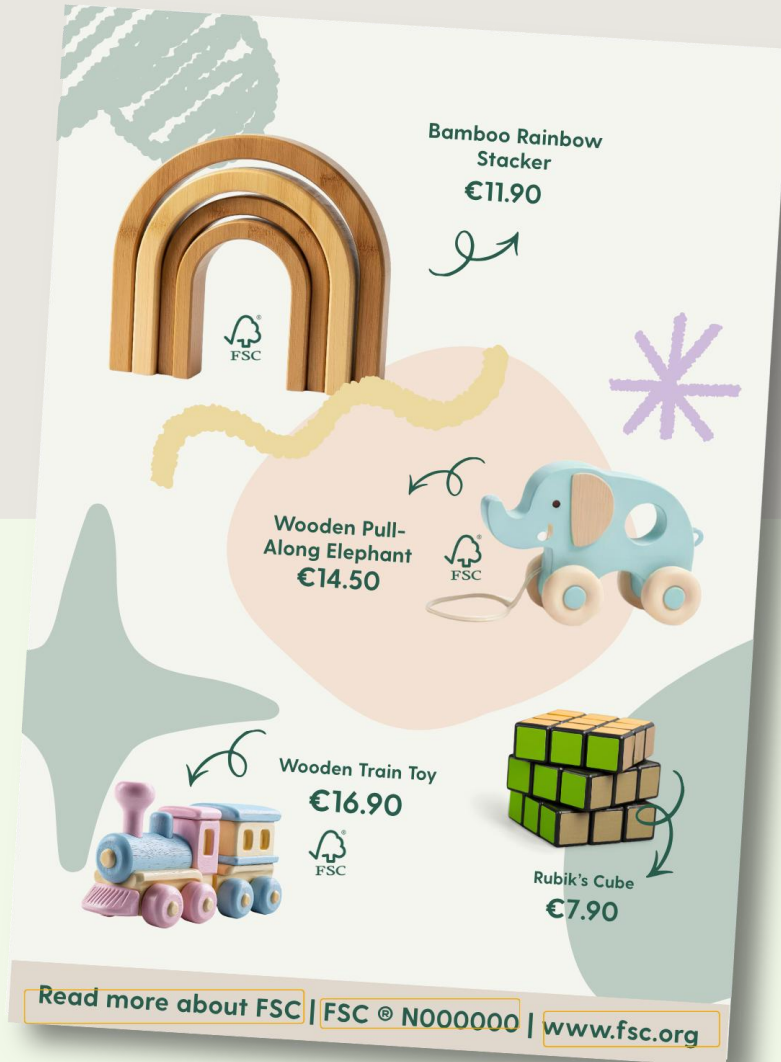
> replace it with the FSC logo or another FSC trademark.

3

Ensure that FSC-certified products you purchase are aligned with FSC provided guidance

> check that on-product labels contain all mandatory elements

Using the FSC trademarks correctly



With any use of FSC trademarks, include:

- the FSC licence code (e.g. FSC N000000), and
- a promotional statement once per material.

All promotional statement must include the FSC website address www.fsc.org

DO NOT use a border or a closed shape around the mandatory elements.

DO NOT present the promotional elements in a design arrangement that resembles the FSC label or the promotional panel design.

Checklist for your FSC-certified suppliers

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 your FSC-certified suppliers



Multiple FSC-certified materials:
If a product contains more than one FSC-certified material, **list all certified materials in additional text next to the FSC label.**

Labels with multiple product types will be available in FSC Brand Hub by July 2026.



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.



Delivering value to our licence holders

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

Streamlining & innovation



- TM rules simplifications – e.g. colours, spacing, background
- Improved rules with clear guidance
- Robust FSC claims supported by a transparent framework

FSC Brand



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

Value



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

STAY INVOLVED

What can you do?



FSC Trademark Use Guide

- Stay informed re: PLH Guide changes
- Join our webinars in 2026



PLH trademark use

- Plan the update and transition of materials using promo panel and FFAF



PLH Resources

- Tailored FAQs
- Technical guidance



Connect with us

- Reach out to your **Trademark Service Provider** for any questions or support

trademark@fsc.org

Q & A

QUESTIONS & ANSWERS