



REVIEW REPORT

of FSC-STD-50-001 V2-1 Requirements for
use of the FSC trademarks by certificate
holders

1 August 2022



Title:	Review Report
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The Forest Stewardship Council (FSC) is an independent, not for profit, nongovernment organization established to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC's vision is that the world's forests meet the social, ecological, and economic rights and needs of the present generation without compromising those of future generations.

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SUMMARY AND RECOMMENDATION

Reviewed document

Document code	FSC-STD-50-001 V2-1
Document title	Requirements for use of the FSC trademarks by certificate holders
Objective of document	The standard sets the requirements for FSC trademark use in the labelling and promotion of FSC-certified products, and for the promotion of FSC certification by FSC certificate holders.
Last approval date	<input checked="" type="checkbox"/> Regular review as scheduled
Review triggered by	<input type="checkbox"/> GA Motion or Board decision
	<input checked="" type="checkbox"/> New or changed FSC policies or legislation
	<input checked="" type="checkbox"/> Change Requests
	<input checked="" type="checkbox"/> Other (please specify): Changes in the FSC trademark portfolio
Reviewer	Julian Nierentz, Programme Manager (Trademark Management)
	email: trademark@fsc.org
Draft Review Report	1 August 2022
Public consultation	1 August – 15 September 2022
Final Review Report	October 2022

Recommendation

<input checked="" type="checkbox"/>	Full revision
<input type="checkbox"/>	Minor revision
<input type="checkbox"/>	Editorial revision
<input type="checkbox"/>	No revision
<input type="checkbox"/>	Withdrawal

Note

If the need for revision is concluded in and supported by stakeholders, the report will be presented to the FSC Board of Directors for decision-making. If approved by the FSC Board, the reviewed document will then undergo a revision process as described in procedure FSC-PRO-01-001 V3-1.

I. INTRODUCTION

This report has been developed according to FSC-PRO-01-001 V3-1 Clause 9.6 to review (assess) the continued relevance and effectiveness of a normative document. This is a mandatory step before a normative document can be taken to a revision process. In addition, it responds to the Board requirement for a feasibility and impact for all review and revision processes, mandated at their 71st Meeting.

II. PROPOSED RECOMMENDATION AND JUSTIFICATION (NARRATIVE)

The last full revision of FSC-STD-50-001 was completed in 2017. A minor revision was performed in 2020–2021. The FSC-STD-50-001 V2-1 was published on 1 January 2022 to include the new FSC MIX label text and controlled wood statements as agreed in the controlled wood strategy in 2019.

FSC proposes a full revision of FSC-STD-50-001 V2-1. Since the past full revision about 50 change requests have been noted by FSC's Trademark Management team, who works directly with certification bodies and certificate holders on more than 4,000 trademark use cases per year.

The key areas proposed for revision are listed below. Addressing these areas is going to simplify and clarify the requirements, lowering the barriers for certificate holders to use the trademarks while ensuring FSC's integrity.

1. Incorporate e-commerce needs

For FSC's trademarks to be of value in e-commerce, current requirements need further clarification, and new areas need to be addressed in the standard, including but not limited to the following:

- Passing on product information from one supply chain player to the other (including retailers) is happening increasingly in a digitized way, especially in e-commerce. The same applies to information about FSC. This area is currently being explored in more detail by FSC International. Results of this work will inform both the revision of the chain of custody requirements, as well as the trademark standard revision to clarify how the trademarks can be used in product information systems (e.g., GS1/GTIN code).
- In case the trademarks are used when both certified and uncertified products are listed in printed promotional materials such as catalogues, a disclaimer needs to specify that not all products are FSC-certified. In an e-commerce environment the standard needs to clarify where and how often (e.g., once per website, webpage, or listing?) the disclaimer shall be used.
- The trademark symbols ® and ™, and the FSC licence code must be used once per material. The standard needs to specify what this requirement means in e-commerce, such as whether the symbols and the licence code need to be used once per website or webpage.
- Current requirements about the size of displaying the trademarks are set in millimetres. For e-commerce and social media, guidance in the form of pixel-size is needed to ensure legibility.

2. Incorporate social media needs

The use of the trademarks for promotional purposes is shifted increasingly towards social media. For FSC's trademarks to be of value in social media, current requirements need further clarification, including but not limited to the following:

- As social media posts are usually short and visual, and often link to websites with additional information, the trademark standard revision shall clarify the use of elements such as trademark symbols or licence codes in social media (as specified in INT-STD-50-001_22 and in INT-STD-50-001_23).
- Currently it is not allowed to use the FSC logo in the shape of a circle. This requirement is outdated also because it is a common way to display designs and logos in social media.

3. Forests For All Forever (FFAF) marks

Changes to the FSC trademark portfolio and simplifying the requirements for use of the FFAF marks need to be addressed in the standard.

- Current colour requirements for the FFAF marks are limiting and stricter than the requirements for the FSC label. The revision process may offer more flexibility and options to certificate holders.
- Currently, the promotional use of the FFAF marks requires users to display a “promotional statement” that can be a barrier for the use of the marks. This condition may be withdrawn to only require the use of the licence code with the mark.

4. Loosen graphic restrictions of displaying the FSC label

More flexibility may be provided, such as in the following areas:

- Currently, four colour variations are available for the FSC label with the option to use other colours used in the print area in case standard colours are not available. The revised standard may offer more flexibility beyond colours used in the print area.
- Offer the option to use a reduced size of the FSC label for very small products, such as hang-tags if legibility is ensured.

5. System integrity

The revised standard may address system integrity risks of so called “empty certificates” (FSC-certified entities not producing any FSC-certified products) by restricting the use of the trademarks by such organisations.

6. Ecosystem services claims

The business model of FSC-verified ecosystem services is currently being reviewed. This will inform the trademark standard revision about what guidance to include for using trademarks to make claims related to ecosystem services.

7. Ownership of the FSC trademarks

FSC International shifted ownership of the trademarks from FSC AC to FSC IC. This is an important change that must be reflected in the revised FSC-STD-50-001.

8. Update FSC messaging and include messaging examples targeted to consumers

Further guidance is needed about how FSC-labelled products can be described in a consumer-friendly way.

- This is particularly the case for products labelled with the FSC MIX label: more examples of messaging to use for MIX labelled products can be included in the standard. Clarify that a MIX labelled product can be described as FSC-certified.
- Also, consumer targeted descriptions of FSC and of products displaying other claims (100%, Recycled) can be added to the standard.

9. Use of FSC trademarks together with marks of certification bodies

Further guidance is needed about how the FSC trademarks can be used by certificate holders together with the marks of FSC-accredited certification bodies.

- Clarify whether and how the marks of certification bodies can be used on FSC-certified and labelled products.

10. Changes due to amendments in FSC policies/new FSC policies

Several new policies, including interpretations, need to be included in a revised standard, such as:

- Annex C of the Chain of Custody Standard (FSC-STD-40-004 V3-1) requires all components of a product that are made of, or contain, material originating from forests that are incorporated into the product to fulfil its function for the consumers' specific need shall be certified. However, if the components do not contribute to the main function of the product, they do not have to be FSC-certified. The trademark standard states that the FSC label shall be used only where all forest-based parts of the product are covered by FSC certification.
- Incorporate the requirements to use the FSC trademarks by project certificate holders (FSC-ADV-50-006 V1-0).
- Incorporate relevant interpretations (INT-STD-50-001), such as the possibility to omit the trademark symbols on e-commerce marketplaces.

11. Composite packaging guidance

More clarity is needed about which parts of packing with several components need to be certified when labelling a product (connected to previous point 10 about components). This needs to be addressed in the Chain of Custody standard (FSC-STD-40-004), and potential implications for trademark use need to be specified in the revised FSC-STD-50-001.

12. Standardize trademark use approvals

Introduce further options to standardize trademark use approvals such as with pre-approved generic formats and templates (INT-STD-50-001_24) and by expanding the relevance of the "trademark use management system" (FSC-STD-50-001 V2-1 Annex A), which defines the requirements for certificate holders to approve trademark use internally, instead of submitting them to certification bodies for review and approval.

13. Visuals to explain the requirements

Where possible, the revised standard can explain trademark use requirements in a more visual way.

14. Future of certification labelling

Ensure that FSC-STD-50-001 is ready to account for new ways of labelling certified products in the future, such as providing consumers more information about the supply chain or provenance of the material used. This area will be explored by FSC International in parallel to the proposed revision. The results of this work shall inform the revised standard.

III. IMPACT ANALYSIS

Document code	FSC-STD-50-001 V2-1	INT-STD-50-001	FSC-ADV-50-006 V1.0
Document title	Requirements for use of the FSC trademarks by certificate holders	Interpretations of the normative framework - Trademark	Requirements to use the FSC trademarks by project certificate holders
How	Full revision.	Incorporate relevant interpretations and amend the document.	Incorporate the provisions from the advice note. Further improve clarity of current provisions and consistency with other trademark use requirements. Withdraw the document.

Interactions with other ongoing or planned activities:

- The trademark standard revision is planned to take place in parallel and in close alignment to related revisions of the requirements in the chain of custody, including:
 - FSC-STD-40-004 Chain of custody standard
 - FSC-STD-40-003 Chain of Custody Certification of Multiple Sites
 - FSC-STD-40-007 Sourcing reclaimed material for use in FSC Product Groups or FSC-Certified Projects.
- The ecosystem services procedure and business model are being reviewed and will inform potential additions to the trademark standard for certificate holders.
- For consistency reasons, the requirements for promotional licence holders for using the trademarks will be amended to reflect the changes agreed for certificate holders.

Resources required during the revision process

FSC:

Staff:

- Capacity required from the Trademark Management team throughout the revision process.
- Other key FSC teams whose capacity may be required: Chain of Custody, Marketing, and Legal.
- FSC management for the decision-making process.

Financial resources:

- Costs may occur for in-person meetings of the working group.
- Design agency for a more visually appealing document.

Other stakeholders:

- Capacity required from a working group of members, certification bodies, or other experts.

Risks and impacts

Certificate holders:

Impact:

- More flexibility and clarity of trademark use requirements.
- More options to standardize trademark uses not requiring approvals by certification bodies.
- New opportunities to use the FSC trademarks with pre-approved messaging target to consumers.

Risk:

- Fatigue in adapting to new requirements, also due to other ongoing normative processes and changes.

Certification bodies:

Impact:

- Revision is meant to address the needs of certification bodies:
The majority of change requests for the standard noted by FSC's Trademark Management team to be addressed in the revised standard were submitted by certification bodies.
- Potential business benefits for certification bodies:
Addressing e-commerce needs, new options for climate and ecosystem services claims, and the additional flexibility of the requirements is meant to increase the value of the trademarks and of FSC.

Risks:

- Trademark approvers need to learn and implement new requirements.

Membership and other stakeholders:

Impact:

- Topics of importance for FSC's membership (e.g., with past accepted General Assembly motions) are planned to be addressed, such as climate and ecosystem services claims, simplification of trademark use rules, or strengthening system integrity.

Risk:

- No major risk identified.

FSC:

FSC Network:

- No major impact and risk identified.

FSC International:

- The revision may reduce the required capacity: Currently, the Trademark Management team receives about 400 trademark use cases per month that require advice. The revision process is meant to improve clarity.
- No major risk identified.



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