



Results of the second public consultation FSC Trademark Use Guide for Promotional Licence Holders External



Results of the second public consultation of requirements for FSC® Trademark Use Guide for Promotional Licence Holders

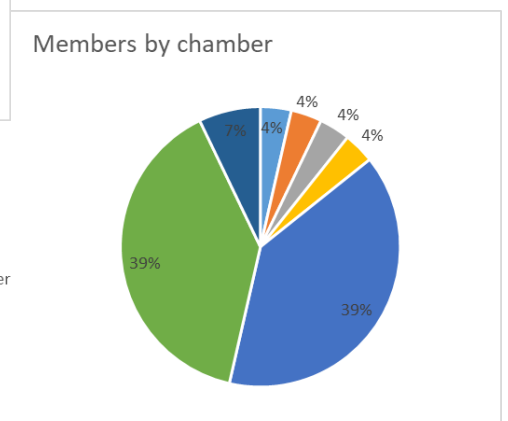
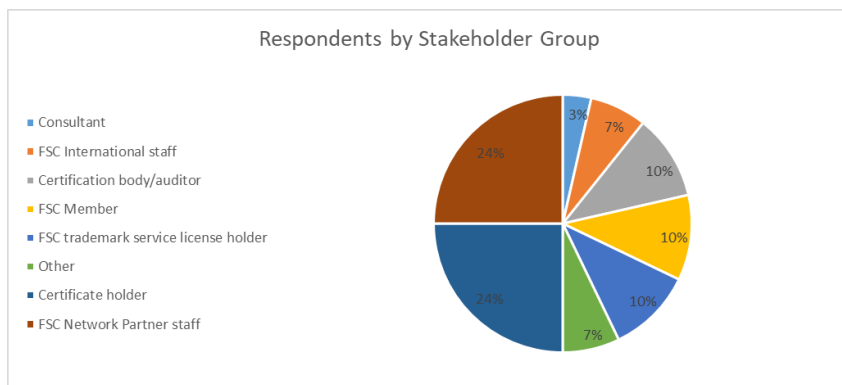
FSC Trademark Use Guide for Promotional Licence Holders defines the requirements of FSC trademark use by promotional license holders. The guideline FSC Trademark Use Guide for Promotional Licence Holders was previously known as the standard FSC-STD-50-002 V1-0 Requirements for promotional use of the FSC trademarks by non-certificate holders.

The second draft of revised requirements was open for public consultation between 1 September and 1 October 2018. This report presents a summary of key stakeholder feedback received during this consultation.

28 stakeholders submitted comments on the draft. Out of the 17 countries represented in the consultation, the largest number of respondents came from the following countries: Japan, Argentina, the US and the UK.

The consultation did not have specific questions however stakeholders were asked to provide their feedback on the content and visual examples in the guide.

Responses to the general feedback questions are presented in **Part I** (page 4). The individual comments are presented in **Part II** (page 10) by section. For reasons of confidentiality, the names of the respondents are omitted in this report. Some comments appear more than once because identical comments were sent by more than one stakeholder.



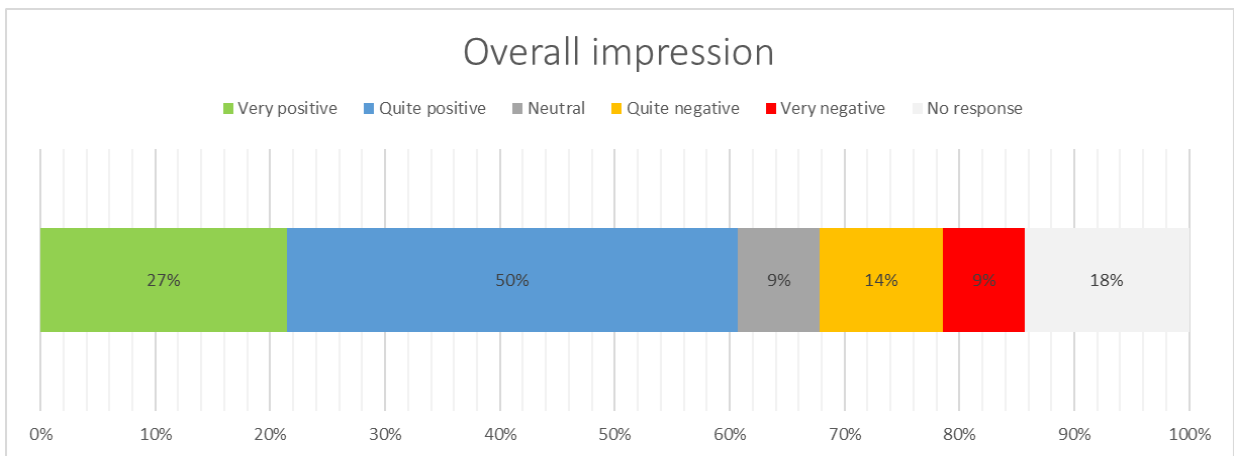


Part I: General feedback

The following abbreviations will be used in this report.

M – FSC Member; CB – Certification Body; CH – Certificate Holder.

What is your overall impression of the standard?





Additional comments related to this consultation question:

Stakeholder	Response
FSC Network Partner staff	Still needs a lot of work in terms of the practical steps for approval. Insufficient detail on some user groups, e.g. ecosystem services. We would prefer to see a standard developed for procurement claims as it is not clear how they will be addressed through this guidance.
FSC International staff	I would suggest to provide visual example of how to search a license code on fsc database (info.fsc.org)
FSC Network Partner staff	- We noticed that all information about the self-approval process has disappeared, except for the short text given in Step 4 of the verification steps. Would be better to write this as its own block of text, perhaps under section 8, so it is clear that this is an exception that companies may opt to do. - Before section 2 (Steps), you should include a section that explains how a company knows if they are eligible for a trademark license. This could be similar to the steps given in the e-training: 1. Do you manufacture or produce timber-based products? 2. Do you want to pass on the FSC claim? 3. Do you want to process or promote products with the FSC trademarks? 4. Are the products clearly labelled? A flow diagram might be helpful as well. If you decide not to include this, you at least need a text that organizations should contact their trademark service provider to find out if they are eligible.
Certificate holder, Economic South	it should have numbers in the requirements to organize this document.
Certificate holder	As an FM/CoC certificate holder we have to pay license fees. Will these license holders have any responsibility for paying fees?
FSC Network Partner staff	As the document is not a guide, the term shall is not used anymore. However, promotional license holders are still required to adhere to the guide based on the Trademark license agreement. As a result it is now not very clear if each clause is a requirement or recommendation. Should we consider any clause with “should” as requirement and other clauses as only recommendations? The use



	<p>of the term “Can” in this document is also not very clear. In some cases it is used to imply physical possibility and in other cases it is used to imply permission (the term “may” is used for this in FSC normative documents”). The current wording of the guide may seem to be user-friendly for readers, but is actually very ambiguous about the use of “should”, “can” and “may”.</p>
Certificate holder	<p>Please just simplify the design of the logo. Please just make only one standard logo for product use and only one standard logo for promotional use. It is too time consuming to deal with all the different logos and to explain to the customers who have no knowledge at all, not to count the ever changing requirements.</p>
Consultant	<p>Many requirements seem to be removed from this guide to be included into an internal operating procedure document. This caused the guide to be much less transparent about many things. e.g. Multinational organizations or groups of companies under the same ownership, Educational and research organizations, media, CBs. Some rules are now only briefly introduced without explaining the precise conditions (i.e. Trademark use management system and two links back). Less transparency means greater risk of inconsistent approach. These hidden rules must not be hidden from the public. i.e. they must not be made internal procedures but must be made public documents either by including into the guide as annexes or by developing a separate documents. Rules to apply must not be hidden. They must be publically available. We do not want any more hidden rules that give advantages to only those happen to know.</p>
Certification body/auditor	<p>it is important to have this guide is official languages, like spanish.</p>
Certificate holder	<p>I did not see any mention about the clear space that has to be present around the FSC logo (equals to the height of the FSC letters)</p>
FSC Network Partner staff	<p>Overall no new information, but it is more clear and practical.</p>
FSC Member	<p>None</p>



<p>FSC trademark service license holder</p>	<p>The guidelines are much simpler than the previous standard used to be. It is easy to understand especially for people not working with FSC trademark related issues on a daily basis. What we still struggle most with, is that many of our direct suppliers are pure trading companies selling finished labeled products to us without even touching them, but they still need to be certified if we want to promote these products. We find this not practical and suggest to (re)consider the "two-links-back" Approach.</p>
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Are there any proposed changes in this draft of the trademark standard that you like?

Stakeholder	Response
<p>FSC Network Partner staff</p>	<p>Greater flexibility for the TSP and, potentially, for the users and better use of visuals. The removal of other user groups, CBs and media/educational use. The flexibility on eligibility e.g. companies with manufacturing processes.</p>
<p>FSC International staff</p>	<p>I agree with the proposed change to a guide</p>
<p>FSC Network Partner staff</p>	<p>We think it is excellent that the standard has become a guide, and that the rules are now only regulated in the trademark license agreement. Much simpler and it makes trademark use a positive thing, not something where our stakeholders are afraid of doing something wrong. Many sections of the text have also become much clearer and easier to understand. Take care that each section is easy to understand for someone who does not know anything about FSC, as is sometimes the case with employees who end up being responsible for their FSC trademark license.</p>
<p>Certificate holder</p>	<p>Simplified with the removal of internal guidance.</p>
<p>Certificate holder</p>	<p>Just to make only one standard logo and simplify the guide to one page.</p>



FSC Member, Social South	No
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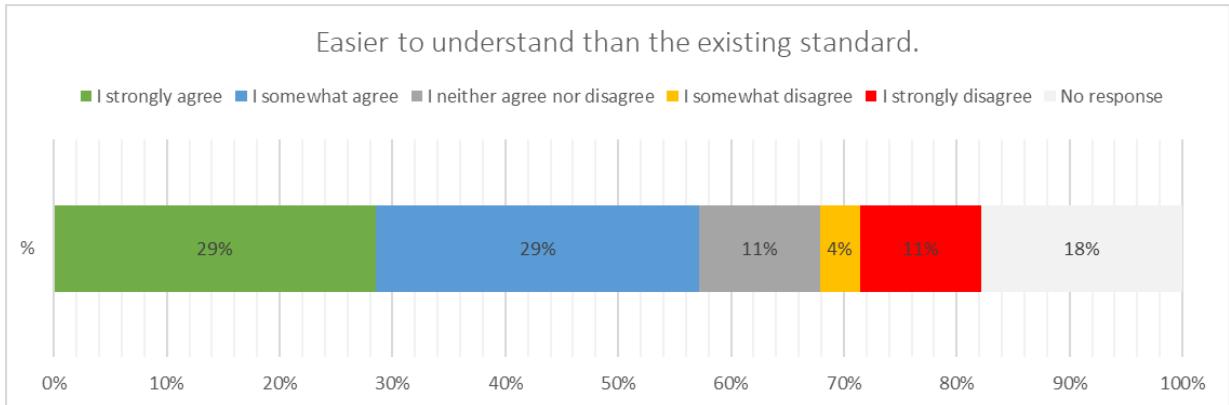


Are there any proposed changes in this draft of the trademark use guide that you do not like?

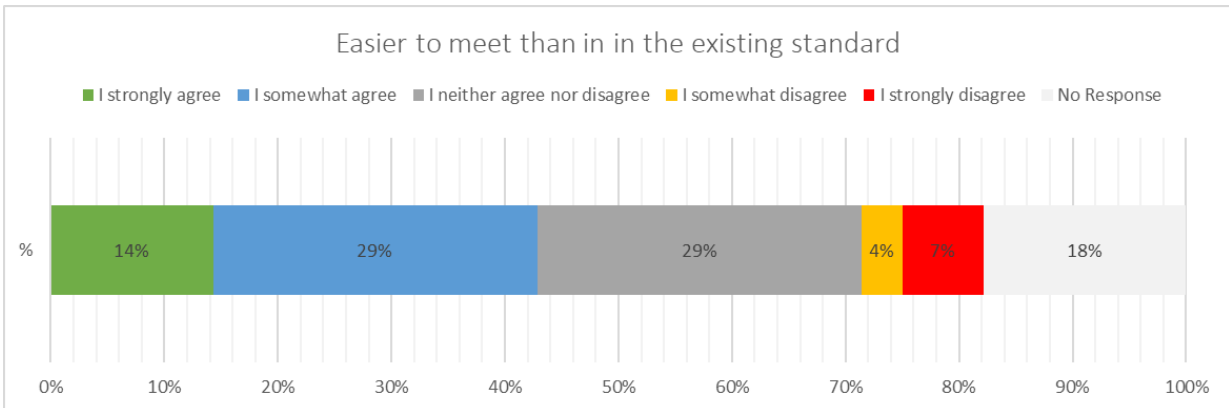
Stakeholder	Response
FSC Network Partner staff	Inclusion of ecosystem services claims without any framework to verify these.
FSC International staff	It could be more visual rather than descriptive. In general, the users are probably companies with low level of interaction with FSC system, but that want to use the FSC logo and need a fast approach and simply and effective informations.
FSC Network Partner staff	Our strongest reaction was to section 8: Verification of FSC-certified products. The table with the steps gives the impression that there is suddenly a new process that needs to be followed, where exceptions such as the two-links back and self-approval systems are introduced as if they are compulsory steps. It would be much simpler if the actual rules for verification were just described in text, e.g. "When applying for a trademark license you need to...", "When submitting your artwork for approval you need to...".
Certificate holder	Don't have time to compare what has been changed.
Consultant	The background and reason behind changing the document status as a standard to a guide has not been communicated at all. The decision to remove many requirements from the guide and include them in the internal procedures has not been consulted. Overall, lack of transparency deemed significant.
FSC Member, Social South	No



The revised guide is easier to understand than the existing standard.

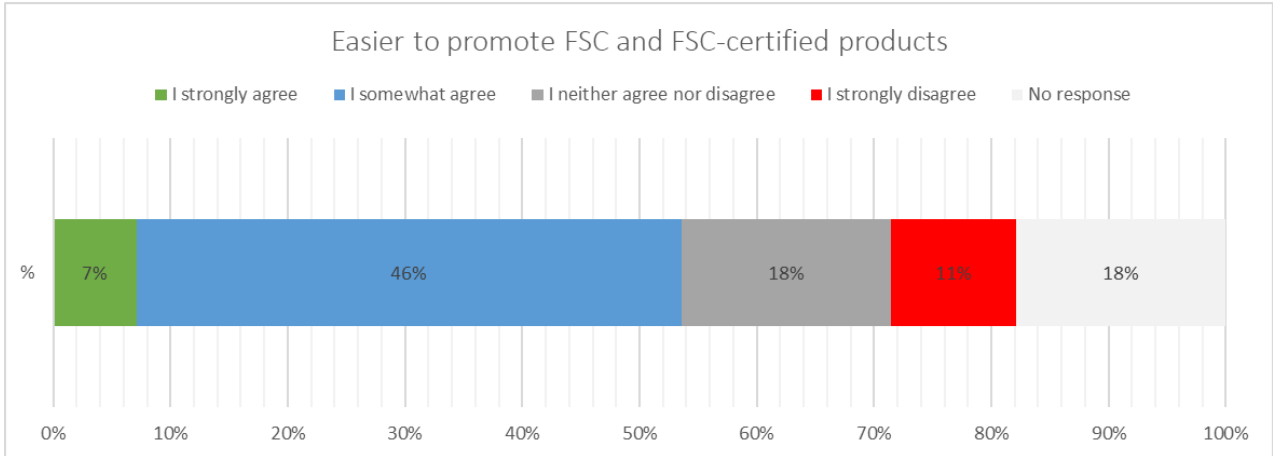


The requirements are easier to meet than in in the existing standard





The requirements will make it easier to promote FSC and FSC-certified products





Part II - Individual comments by section

Welcome	Please provide your comments in relation to section 'Welcome'. If you wish to be specific, please copy & paste the text to which your comment relates.
FSC trademark service license holder	We would like FSC to introduce possibilities/ways to allow promotional license holders to be able to apply FSC labels on a product/packaging.
FSC Network Partner staff	Contents Page: Point 5 should read 'identifying FSC-certified products IN promotional materials. 'On-product promotion' - we find this phrase potentially misleading and suggest not have it as a listed item in the content. It implies that on product labelling is possible by these users. Para 1: Question use of "prosperous" rather than "viable" in relation to economic management. First four paragraphs still need work. Nice to have a "sell" here but this feels slightly off-target in terms of what these people need to know. Para 3 and 4 are the better two but this needs a stronger statement to define who this guide is for and how they use it. Para 5 - FSC certified and not FSC certification of products. Para 6 should end with also a note referring to 40-004. Will the guide be updated occasionally or as required. Final para should clarify meaning of 'approval has lapsed'.
FSC International staff	I understand that providing number are welcome. Also, the language is clear and easy to understand. I would suggest to include here that FSC has a Global Strategy and a brief and friendly description of the Critical result area 2.1. I wouldn't maintain the part " organizations labelling..." too restrictive and unfriendly for an introduction. I think the introduction is for the welcome to any stakeholder and to instigate the reader.
FSC Network Partner staff	- Should be "Forest Stewardship Council", not "The Forest Stewardship Council" - "Environmentally appropriate, socially beneficial and economically viable" are the terms we usually use within FSC (at least on FSC's website) - Second paragraph: FSC has three main user types: Forest owners (> 200 million ha), certificate holders (> 35,000), and license holders (> 900). Would be good to mention all of these here. - "Modern society needs forests..." add on more examples or remove the sentence. - Change "corporate responsibility ethos" to "corporate social responsibility" to use a term people recognize. - Is the reference to (FSC and GlobeScan 2017) necessary? If yes, where is the full reference? - The purpose of the guide should be made more clear and come earlier in the text - currently it consists of only one sentence at the end of paragraph 3.



Certificate holder, Economic South	Insert numbers of the requirements could help do organize this standard. For example: 4. The FSC logo and promotional designs 4..1 Promotional elements 4.2 Promotional text 4.3 FSC Marketing and Communications Toolkit
Certificate holder	Paragraph three - "The FSC brand is recognized globally as the world's most trusted sustainable forest management solution that will deliver positive impacts for forests, markets, and people, both now and in the future." Conflicts with FSC's guidance to use "responsible forest management" rather than sustainable forest management.
Who is this guide intended for?	Please provide your comments in relation to section 'Who is this guide intended for?'. If you wish to be specific, please copy & paste the text to which your comment relates.
FSC Network Partner staff	Manufacture - this is now the wrong term as we the guide proposes allowing manufacturing orgs to have TLA. Should this in fact state 'any organisation that wishes to use the FSC trademarks for the promotion of FSC certified finished and labelled products or services and whose activities would not require FSC certification (as defined by 40-004) to do so'? The list of users is missing types of users who we know hold TLA for promotion of the use of FSC certified materials (brokers, architects etc.) - so listing groups in this way has not captured all groups. We would recommend defining the USES of the FSC trademark i.e use of FSC certified and labelled products in business operations and give examples of the type of USER that these uses relates to, e.g. hospitality organisation. Although not a complete list, the table of pg 4 of internal guide could be a starting point for this. Needs to state here that there is an eligibility process aside from the list of USES and that this is at sole discretion of FSC.
FSC International staff	I missed the target group Certification Body, because the FSC-STD-50-001 is not applicable to them as well. The trademark license agreement could be explained as an agreement to gives the organization the right to use FSC labels to promote or to reference the certification. This language appears like a restriction rather than an opportunity to allow organizations to be part of the FSC's family. Also, could have here a visual example of the license number. Otherwise, the clarity



<p>FSC Network Partner staff</p>	<p>- Start the text with a positive message - we suggest changing the first paragraph to: "This guide is intended for organizations that wish to promote FSC, the sale of FSC products or their use of FSC products. To manufacture, package and/or label products as FSC-certified using the FSC on-product labels, organizations are required to hold a Chain of Custody Certification (see FSC-STD...)". - Second paragraph: "All organizations must sign a trademark license agreement with their trademark service provider in order to use the the FSC trademarks. Here are some user groups that this guide applies to" or equivalent. - Include a text e.g. "This guide is intended to provide information on how the FSC trademarks can be used. The rules for the use FSC trademarks are regulated in the license agreement."</p>
<p>Certificate holder, Economic South</p>	<p>"Media, education, and research institutions Media, education, and research institutions (and other similar organizations) should contact their FSC national or regional office, or FSC International." It is important to have an easy way on website from FSC national office that this institutions can make contact to know how to use FSC brands.</p>
<p>Certification body/auditor</p>	<p>What about CAB? I see they are no longer listed in the standard? If a CAB wants to use the FSC trademarks which standard will be applicable?</p>
<p>Certificate holder</p>	<p>I have found that, as a custom wall and ceiling panels company, we do not seem to be exactly represented by these documents. We make products FSC-certified if they are requested, being part of the construction industry, but we do not stock and store FSC materials or products. Thus we are not exactly a retailer or a brand owner as this document implies.</p>
<p>Certification body/auditor</p>	<p>The examples are good, but the initial sentence 'any organisation that does not plan...' is confusingly worded. This isn't how such organisations would define themselves. Suggest something like 'Organisation that plan to sell FSC labelled products to consumers or to use them in their own business may be eligible to promote them using the FSC trademarks..etc.' (use of 'may be eligible' to ensure final say is with FSC!)</p>
<p>FSC Network Partner staff</p>	<p>Maybe the eligibility flow diagram could be revised. The eligibility for a license or CoC is clear, but for license or project certification is not that clear. It would be great to have a stronger base line for what kind of companies we do not license the FSC trademark, (e.g. pesticides companies).</p>



<p>Steps to using the FSC trademarks</p>	<p>Please provide your comments in relation to section 'Steps to using the FSC trademarks'. If you wish to be specific, please copy & paste the text to which your comment relates.</p>
<p>FSC Network Partner staff</p>	<p>Should state how you find out who your national or regional office is i.e. website address. Step 2: should include "and carry the FSC on-product label visible to the consumer". Delete final sentence - superfluous.</p>
<p>FSC International staff</p>	<p>I think for someone who is trying to learn about the FSC requirements and language, this part is a bit confuse! From the perspective of someone without previous knowledge: Step 1: what is a trademark service provider? what is a license agreement? Step 2: events organizations, consultant, training companies may not have products. Step 3: i would suggest to create a visual orientation, with an example of a license code. Step 4: i would start the phrase with a clarification that is easy to get the draft artwork, there are examples to be downloaded, examples of phrases, etc. I would suggest to change the layout here and use a info graphic. This part of the guide is fundamental, if an organization wants to " have a look" at this guide to see if is easy or not to use FSC labels.</p>
<p>FSC Network Partner staff</p>	<p>Excellent! We are very happy to see a step-by-step guide of the process. A couple of comments on the content: - Step 4 - Start with "All materials where you wish to use the FSC trademarks must be submitted to your trademark service provider for written approval." - Step 5 - take away "your trademark service provider will send you written approval" as it fits more with step 4.</p>
<p>Certificate holder, Economic South</p>	<p>Step 1 - Is it paid anually? It is important to say it. Step 2 - How is this verification process conducted by the trademark service? Are there more requirements for it? For example: - If an organization have this license but didn't buy any FSC produt last year, is it possible to continue use this license? Step 5 - If possible, the FSC National office should be able to develop a platform/website or something to make this process easier and faster to approve the FSC logo?</p>
<p>FSC trademark service license holder</p>	<p>The link between step 2 and section 8 is not clear. Is section 8 "Verification of FSC-certified products" a detailed description of the step 2?</p>



<p>'Introducing the FSC trademarks</p>	<p>Please provide your comments in relation to section 'Introducing the FSC trademarks'. If you wish to be specific, please copy & paste the text to which your comment relates.</p>
<p>FSC International staff</p>	<p>ok</p>
<p>The FSC logo and promotional designs (i) - The FSC logo and promotional designs & Promotional elements</p>	<p>Please provide your comments in relation to section 'The FSC logo and promotional designs (i) - The FSC logo and promotional designs & Promotional elements'. If you wish to be specific, please copy & paste the text to which your comment relates.</p>
<p>Certificate holder, Economic South</p>	<p>Promotional elements - promotional text: - explain that examples of promotional texts are below.</p>
<p>Consultant</p>	<p>I believe the sentence "The FSC logo, promotional panel, and 'Forests For All Forever' marks can be used in the variations shown" is trying to mean that promotional license holders are only allowed to use the FSC trademarks in the variation shown. However, the term "can" used here implies physical possibility and not permission. In this context, the term "may" should be used. I understand that language used in the guide should be as simple and user friendly as possible, but ambiguity must be avoided.</p>
<p>FSC International staff</p>	<p>ok</p>
<p>FSC Member</p>	<p>I like "Forests For All Forever" marks very much, but I know from practice how difficult it is to keep all tiny details clearly visible when hot branding is used on the wood. Even with high quality branding dies, tiny details such as "R" in a circle are often too dark/overburnt or not easily readable. Many products rejects.</p>
<p>FSC Network Partner staff</p>	<p>1st sentence - Promo panel has not yet been introduced in the document. 1st sentence of Promotional Element section - Isn't it the case that you only need to use these key pieces of information if you are using the FSC logo (i.e. not if you are using just FSC or the title). So this should just say FSC logo and the requirements of just using the initials or title should be outlined elsewhere. The promotional text is not marked as compulsory in the promotional panel graphic and the FSC website is not marked as compulsory in either graphic. However, the preceding paragraph states that these must be present. Also, promotional text in use of FAFF - this will rarely be referring to 'a product'. i.e. single product. It will typically be a range of products so product specific messaging does not work. Please suggest messaging appropriate for a range of products/services etc. Is it the case that you cannot download the FFAF Promo Panel from</p>



	<p>the TM portal? In which case the statement below is misleading and should explain how you have to make it. Please consider making an attractive and viable FFAF Promotional Panel available from the TM Portal. Also reconsider the use of phrase online 'tool'. Show landscape example of Promotional Panel and include an example of how to use the compulsory elements if not using a full promotional panel. End with some explanation of how to comply with requirements if just using FSC initial or title.</p>
FSC Network Partner staff	<p>- The title of section 4 does not reflect the content. Rename it, e.g. "Graphical rules for the use of FSC trademarks" or "Designing your promotional materials". - Include a "This section covers..." sentence for all sections, as you do in Section 5. - Can the Forests For all Forever brandmarks be downloaded from the Trademark Portal? Is there information about where they are made available? - Can the structure of the columns (Logo, Promotional Panels, Brandmarks) be made more clear?</p>

The FSC logo and promotional designs (ii) - Promotional text	Please provide your comments in relation to section 'The FSC logo and promotional designs (ii) - Promotional text'. If you wish to be specific, please copy & paste the text to which your comment relates.
Certificate holder, Economic South	Explain that when the organization use the "Forest for all forever", it is mandatory to write some promotional text.
Certificate holder	Third bullet - "Choosing FSC® supports sustainable forest management." I'm confused about the note in the crosswalk document that states that ISO guidance says no claims of sustainability should be made. Shouldn't this say that Choosing FSC® support responsible forest management?
FSC International staff	<p>Possible additional examples focused on FSC general guarantees By choosing this product, you help to take care of the communities that depends on the forest. By choosing this product, you help to avoid illegal logging. By choosing this product, you help to take care of the forest's workers. For FSC Recycled 100%, FSC Recycled Credit product groups: By choosing this recycled product, you help to reduce the pressure on forests. Please see this webpage with other interesting guarantees that could be "translated" into phrases. https://www.fsc-uk.org/10-good-reasons-to-choose-fsc.90.htm Problem: If a company wants to give preference to products that come from communities (one of the targeted group in the document "FSC Global Strategy"), it is not possible with the actual FSC database , due to the fact that is not possible to search products made from community. In other words, the company would have to</p>



	KNOW the suppliers and talks straight to them, rather than easily find this information on FSC Database.
FSC Network Partner staff	Please use responsible and not sustainable in point 3. See previous section regarding single product specific messaging not being appropriate for most uses (which will cover more than one product).
FSC Network Partner staff	- What are the grey sections of the text? In this case it is not needed; write in that more examples are given in Annex A into the introductory text. You already have a link to the Marketing toolkit underneath.

The FSC logo and promotional designs (iii) - Compulsory text requirements'	Please provide your comments in relation to section 'The FSC logo and promotional designs (iii) - Compulsory text requirements'. If you wish to be specific, please copy & paste the text to which your comment relates.
Certificate holder, Economic South	"Consultants and training companies - the phrase 'FSC® is not responsible for the content of any training/consultation/services offered by [name of organization]'" only is mandatory if the consultant is offering training or consulting services? This phrase needs to be added in the website of the consultants? And in folders that are not talking about training or consulting services?
FSC International staff	I understand this guideline could create an huge opportunity to connect FSC with education in order to stimulate the education regarding issues such as forest, environmental protection, natural resources, illegal logging, nature conservancy, and so on by making FSC claims. So, I would suggest to dedicate a session to "translate" the FSC guarantees and gives examples of how it can be used in educational materials and activities. Education is the main tool to change people's mind and help to create a different mindset which can help to increase the FSC products on market. By the way, those phrases "FSC is not responsible for" are very unfriendly. I understand the limits have to be defined, but maybe the same thing could be said differently.
FSC Network Partner staff	Consider adding extra requirement here for any high risk groups e.g. print managers - this could be using a risk mitigating factor when issuing TLA to certain users. Also consider a statement to allow the TSP to request other additional text requirements in certain circumstances.
FSC Network Partner staff	- This section feels like it hangs loose. We interpret the title as text that is compulsory for all license holders. It would fit better as a block at the bottom of the promotional text page, so it looks more like an exception to note rather than a whole section that only speaks to two user types.



The FSC logo and promotional designs (iv) - Colour	Please provide your comments in relation to section 'The FSC logo and promotional designs (iv) - Colour'. If you wish to be specific, please copy & paste the text to which your comment relates.
Certificate holder, Economic South	'Forests For All Forever' mark - explain that the 'Forests For All Forever' mark can't be used in another colors (like "FSC logo").
FSC International staff	If none of the standard colours can be used on printed materials, the FSC logo and promotional panel may be produced using another colour as long as it provides a legible contrast - great language, simply and objective. I would suggest to be more permissive with the colors of the " Forests for all forever" logos as well.
FSC Network Partner staff	Consider reformatting page 7 and 11 and combining them as essentially we are talking about colours in both pages. Also it should say FSC logo and Promo Panel in first sentence. We would ask that 8.3 (logo) and 9.3 (in relation to FFAF only) of 50-001 are reflect here, though perhaps with some rewording to reflect the different tone of this document.

The FSC logo and promotional designs (v) - Size and clear space	Please provide your comments in relation to section 'The FSC logo and promotional designs (v) - Size and clear space'. If you wish to be specific, please copy & paste the text to which your comment relates.
Certificate holder, Economic South	"Clear space" - the "FSC logo" is without registration mark ®.
Certificate holder	Is it possible to give an indication of the heights of various promotional panels, as well?
FSC International staff	For small sized materials, the minimum clear space may invalidate the logo usage in (e.g.) small gifts. Maybe the statement should be " to have clear space surrounding the trademark to ensure it remains uncluttered, without a minimum clear space.
FSC Network Partner staff	The graphic needs titles (presumably "Recommended Minimum" and "Minimum"?) Need old wording reinstated here that you measure from the top of the tree to the bottom of the letters FSC and also please make clearer (as in using words not just graphic) that this measurement is the same within the Promotional Panel (not the box). Rather ironic that the graphics at minimum recommended size are not legible...
Other	Considero que en ese tamaño, para el tipo de producto que manejamos es muy pequeño.
Other (English)	I consider that for the type of product that we use, that size is too small



<p>'The FSC logo and promotional designs (vi) - Backgrounds</p>	<p>Please provide your comments in relation to section 'The FSC logo and promotional designs (vi) - Backgrounds'. If you wish to be specific, please copy & paste the text to which your comment relates.</p>
<p>FSC International staff</p>	<p>We've noticed that some communication materials are published like the third example, not giving the contrast that the guide refers to. Also, our office had been asked why that material was approved and why retailers that present us that kind of bad use were asked to correct the material when others are communicating like example 3.</p>
<p>FSC Network Partner staff</p>	<p>Needs to state where to find the trademark registration list. The final sentence of Para 2 is confusing and should be deleted as it is addressed below. Needs clarification as to when TM should be used and when no symbol should be used. I would suggest avoiding references to adding the trademark symbol to the logo, promotional panel and FFAF marks - it should be downloaded with the correct symbol rather than edited to add these. The trademark symbol is not added to the promotional panel anyway, only to the logo within it.</p>
<p>FSC Network Partner staff</p>	<p>Backgrounds: - Are license holders ever allowed to place the FSC logo on a patterned background, as long as it has sufficient contrast? We would also like an example of this case to be included. See e.g. https://se.fsc.org/se-se/pressrum/nyheter/id/303 Registered trademarks: - Where can the trademark registration list be found? - We do not understand the section with bullet points for R/TM symbols. Are they exceptions? Are they the rules of use? Needs to be clarified. - Put the How to use the trademark symbol points before the other bullet points, as it is more important information that applies to all uses (whereas the other points are relevant for specific cases?) - The box "Why is the use of trademark symbol important?" Is not needed, it provides very little information. Add a sentence in the beginning of the text instead.</p>
<p>FSC Network Partner staff</p>	<p>The example showed of what is not possible to do, appears several time in some artwork including from other National Offices, which has already caused us problems because we didn't approved the artwork and TSP clientes showed us some exemples that they have seen.</p>



<p>The FSC logo and promotional designs (vii) - Language versions & Translations of the strapline</p>	<p>Please provide your comments in relation to section 'The FSC logo and promotional designs (vii) - Language versions & Translations of the strapline'. If you wish to be specific, please copy & paste the text to which your comment relates.</p>
<p>FSC Network Partner staff</p>	<p>It is likely to cause confusion when it refers to translations of the strapline having previously stated that licence holders cannot create new translations. It needs better explanation of what is allowed. Better visual examples would help. Promotional messaging should be defined.</p>
<p>FSC Network Partner staff</p>	<p>- The grey text under Language versions: Write "Promotional licence holders cannot create new versions..." rather than translations, to clarify the difference between this and translations of the strapline. - Add in examples of translated straplines rather than writing (translated straplines) under the marks. We did not understand the difference from the language versions at first.</p>



<p>Using the FSC trademarks to promote certified products</p>	<p>Please provide your comments in relation to section 'Using the FSC trademarks to promote certified products'. If you wish to be specific, please copy & paste the text to which your comment relates.</p>
<p>Consultant</p>	<p>FSC-STD-50-001 V2-0 clause 4.2 says "The FSC label should be clearly visible on the product, its packaging, or both." It was "shall" in the old standard (V1-2). Since flexibility was given for CHs to allow them not to clearly show the FSC labels on products or packaging, a consistent approach is needed for this guide too. i.e. the condition which says "carry the FSC label and the label is visible to consumers" should be phrased so that it is clear that it is not a mandatory condition but a recommendation only. This consistent approach is very important to avoid future confusion and misunderstanding.</p>
<p>FSC International staff</p>	<p>What if the retail wants to preserve its supplier's name and wants to use its own brand, and the certified product does not carry the FSC label but is certified? Other concerns are related to the scope of the claims that would be made (e.g. a TSP holder would make that claim based on the volumes of a holding, several sites, etc..)</p>
<p>FSC Network Partner staff</p>	<p>Suggest rewording first sentence, e.g. This section covers the use of the FSC trademarks in promotional use, such as catalogues, online retail, point-of-sale material etc. The restriction to products that are to be sold only to final consumers contradicts the earlier statement that "Shops, stores, and brands that sell FSC-certified and labelled products to consumers or businesses, including online retailers." Are we restricting these licences to those selling to final consumers? If so, these should be defined (and should we refer to end users?). The section on 'Printed and digital promotional materials' could be relevant for other uses (e.g. consultants, investment companies, etc) so should be elsewhere in the guide (with p.8?). Useful to reiterate what "the compulsory elements" are here? In the visual examples, the promotional panel and brandmark are illegible (consider close-ups). Provide an example of social media posts. Change title on page 16 to "in promotional materials". The first sentence on page 17 implies that all initial, logo and promotional designs all need to be used against every product - needs rewording. 3rd para change "on request only" to "only on request" and "based on" to "subject to". Would a hangtag such as that used in the illustration be allowed? Final paragraph needs examples (e.g. of how this could be misleading in a catalogue). Graphics on page 17 are confusing.</p>



<p>FSC Network Partner staff</p>	<p>- the "FSC-certified products can be promoted if they..." section should be its own section before the Steps to using FSC trademarks. Write "See Section XX" here instead. -First sentence under Printed and digital promotional materials: Write "compulsory elements of the FSC trademarks (see page XX)" to remind users what the compulsory elements are (and to not confuse them with the compulsory text for investors etc.). - Good, clear examples. - Great that you have added guidelines for social media. Under "Identifying FSC-certified products on promotional materials": - A better example of using FSC trademarks with products would be a page with the "Look for our products" text, 4 products, of which two have the FSC logo (or equivalent). In the current example, it is also not clear whether both the chair and table are FSC-certified, or if it is just the chair. - The last two pictures (on page 17) give very little information. Can you find real examples of this instead? Or add in generic product names or something.</p>
<p>FSC Network Partner staff</p>	<p>Is "are to be sold only to final consumers" without exception a rule? I'm thinking of cases where a wholesaler of office products holds a licensing to promote FSC certified products in their assortment. Some of those are actually not, or not always directly selling to final consumers. Some have a company in between (that is not using FSC TMs or might apply for logo licensing too). With this rule, these cases would fall out...</p>



<p>FSC Network Partner staff</p>	<p>Comment 1: Regarding 'FSC-certified products can be promoted if they: have been verified by an FSC trademark service provider': It is not clear what needs to be verified from this sentence alone. From the step 2 of the section 2, it can be considered as verification of the products in question as FSC certified products. Proposal for new, more user friendly wording: 'FSC-certified products can be promoted if they: have been verified as FSC-certified by an FSC trademark service provider.' Comment 2: FSC-STD-50-001 V2-0 clause 4.2 says "The FSC label should be clearly visible on the product, its packaging, or both." It was "shall" in the old standard (V1-2). Since flexibility was given for CHs to allow them not to clearly show the FSC labels on products or packaging, a consistent approach is needed for this guide too. i.e. the condition which says "carry the FSC label and the label is visible to consumers" should be phrased so that it is clear that it is not a mandatory condition but a recommendation only. This consistent approach is very important to avoid future confusion and misunderstanding. Comment 3: Regarding the left picture above the section of 'Clear identification of products': Magnified image of "the mark of responsibility" is not relevant in this context. It should be removed (or at least needs to be clear why this image is magnified). Regarding the right picture above the section of 'Clear identification of products': I believe this picture is an illustration example of "If your materials list both FSC-certified and uncertified products, the promotional text (such as 'Look for our FSC®-certified products') must be used next to the promotional elements, and the FSC-certified products should be clearly identified". However, because there is an FSC logo in black and white at the right bottom of the page, I got a feeling that all products on this page are FSC certified. To make clear of the intention of the image, this FSC logo in black and white should be removed or place on different page.</p>
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<p>'Using the FSC trademarks to promote certified products</p>	<p>Please provide your comments in relation to section 'Using the FSC trademarks to promote certified products (ii)'. If you wish to be specific, please copy & paste the text to which your comment relates.</p>
<p>Certificate holder, Economic South</p>	<p>"On-product promotion" Some companies have already ask us if it is possible only use the "FSC logo" (withou the license code) in hang tags in a store - to inform the clients when some product are FSC certified. Is it possible? Reading this text above and seeing this photo, we think it is possible.</p>
<p>Certificate holder</p>	<p>It might be just me, but I don't understand what you're saying here, "Promotional licence holders can affix promotional materials or use the FSC trademarks for on-product promotion, such as hang tags and</p>



	table talkers. However, promotional licence holders cannot apply the FSC labels to any product or packaging or promotional materials."
FSC Network Partner staff	Should reiterate that these should be approved (i.e. affix "approved" promotional materials) and that the products must already carry an FSC label (applied by an FSC certified company). The promotional materials should be product specific e.g. "this Sienna range of garden furniture is..." to avoid being misused. Co-branding: in section 9 it states that "combining any FSC trademarks or designs with any other branding in a way that implies association" is not allowed. This section on co-branding is therefore confusing. If allowed only with FFAF (see Marketing Toolkit guidelines on co-branding), this should be clarified.
FSC Network Partner staff	- In the second sentence under On-product promotion: Specify "FSC on-product labels" to be clear what is intended. It currently sounds like the license holder cannot place their promotional label on promotional materials. - I would like to see some rules for companies wishing to place the FSC promotional panel in their website footer. We get this request a lot.
FSC Network Partner staff	for me the text is not clear enough: they can 'affix' but 'not apply'... Maybe it needs to be more clear that they can add the on-product promotion, but only if the product carries an on product FSC label (which can only be applied by a certified company) ... or something similar...
FSC Network Partner staff	"On-product promotion : Promotional licence holders can affix promotional materials or use the FSC trademarks for on-product promotion, such as hang tags". To prevent risks I would add what's follow : "provided the products carry a label visible for the consumer"
Making procurement claims	Please provide your comments in relation to section 'Making procurement claims'. If you wish to be specific, please copy & paste the text to which your comment relates.
Certification body/auditor	Third-party verification of claims - CABs does not have contracts with these companies and therefore will not be able to verify this.
Certification body/auditor	Presumably this can be if the label is on, say, outer packaging of office paper/paper washroom products etc. and doesn't need to be on individual sheets?



<p>Consultant</p>	<p>Comment 1: For promotional claims, having the product carry FSC label should not be made a condition. There are so many products which are FSC certified yet do not carry labels for many reasons (such as interior materials and furniture). For example, when a cafe (e.g. <name omitted> uses FSC certified furniture and wants to promote, these , furniture do not usually carry FSC labels. Designwise, having FSC label on every product is nonsense. Furthermore, FSC-STD-50-001 V2-0 clause 4.2 says "The FSC label should be clearly visible on the product, its packaging, or both." It was "shall" in the old standard (V1-2). Since flexibility was given for CHs to allow them not to clearly show the FSC labels on products or packaging, a consistent approach is needed for this guide too. i.e Now not all FSC certified products to be promoted will be clearly FSC labelled. Comment 2:"large quantity" is far too ambiguous term to use. What should matter here is not the quantity but the proportion of FSC purchase anyway. Proposal for amendment: "count for more than 50% of all products purchased (certified and non-certified) in the same product type." Comment 3: Regarding the "Third-party verification of claims". Promotional license holders are not certified by CBs but given license by the TSP. Verification by CBs is not practical. To do so, they will need to contact CBs to sign agreement to be verified annually which will be additional cost to the license holders. Percentage and volume claims verification should both be done by the TSP.</p>
<p>FSC International staff</p>	<p>Third-party verification of claims: it is not regulated by our standard. Does it have to be? It is a new service for CBs. Also, could it be registered by an innovative on line tool on our database? Would have to be requested to be developed by IT team or outsourced. it could help to improve our database information.</p>
<p>FSC Network Partner staff</p>	<p>Define "large quantities". What is the rationale behind this restriction? What are the rules on making procurement claims without using the logo? How would we be expected to verify a volume-based claim? What evidence must be submitted to verify that a percentage based claim has been verified by an FSC accredited CB? This all needs further clarification. Has guidance been provided to FSC accredited CBs? We would prefer to see a separate procurement standard.</p>
<p>FSC Network Partner staff</p>	<p>- Under "Third-party verification of claims": Add a sentence e.g. "Contact your trademark service provider for more information". or equivalent so license holders know what to do. - Is there any guidance for TSPs about what to do if a license holder approaches us saying that they want to make a percentage-based claim? Should we simply give them a list of CBs?</p>
<p>FSC Network Partner staff</p>	<p>i would drop 'carry the FSC label' as in many cases the goods that are procured are not (or not all) physically labelled (some at best on the packaging, some are not). e.g. - procurement of tissue paper for public toilets - procurement of cups, wooden cutlery ... - procurement of printed goods - procurement of many timber products ...(e.g. case</p>



	<p>where retailers builds store and all OSB used in project is FSC certified but none is labeled)</p>
<p>FSC Network Partner staff</p>	<p>Comment 1: Regarding ‘Promotional licence holders can make procurement claims for FSC-certified products if the products: carry the FSC label’: Currently in Japan, <name omitted>, <name omitted>, <name omitted>, <name omitted> etc are using phrases such as “We are aiming to procure all our paper packaging with FSC-certified products”. These claims are usually done to include general product types (such as paper packaging) rather than a specific products. On the other hand, FSC-certified paper packaging do not always carry FSC labels. There are some labelled products and there are some non-labelled FSC certified products. This condition (about needing to be labelled) will mean huge negative change of requirement for these companies which are already making promotional procurement claims using FSC trademarks. And For promotional claims, having the product carry FSC label should not be made a condition. There are so many products which are FSC certified yet do not carry labels for many reasons (such as interior materials and furniture). For example, when a cafe (e.g.<name omitted>) uses FSC certified furniture and wants to promote, these , furniture do not usually carry FSC labels. Designwise, having FSC label on every product is nonsense. Furthermore, FSC-STD-50-001 V2-0 clause 4.2 says "The FSC label should be clearly visible on the product, its packaging, or both." It was "shall" in the old standard (V1-2). Since flexibility was given for CHs to allow them not to clearly show the FSC labels on products or packaging, a consistent approach is needed for this guide too. i.e Now not all FSC certified products to be promoted will be clearly FSC labelled. Comment 2: Regarding ‘Promotional licence holders can make procurement claims for FSC-certified products if the products: are purchased in large quantities: The definition of large quantity depends on companies. So setting a threshold is difficult. Moreover, companies often start from purchasing small quantities and aim to purchase larger quantities over time. This condition will make these companies unable to promote their effort until they reach a certain amount. This will discourage these companies from making promotional claims using FSC trademarks. This condition should be removed. Comment 3: Regarding ‘Promotional licence holders can make procurement claims for FSC-certified products if the products: have been verified by an FSC trademark service provider: As commented in section 5, it is not clear what needs to be verified. Proposal for new, more user friendly wording: ‘Promotional licence holders can make procurement claims for FSC-certified products if the products: have been verified as FSC-certified by an FSC trademark service provider.’ Commnet 4: Regarding the “normative and fair us”, although it is a legal matter, it still is information that companies wishing to make procurement claim need to know. It should be</p>



	<p>mentioned in the guide as an additional information. In section 4, legal matter of “national consumer protection law” is mentioned. So “legal matter” is not a reason to exclude any information from the guide.</p> <p>Comment 5: Regarding the example ‘Hotel Green has a preference for FSC®-certified paper products’: the intention of the example is not clear. Does this imply that even if only some paper products are FSC-labelled (like the case of second example), one can still make procurement claim if s/he does not mention specific products (such as paper cup in the second example)? Or is this procurement claim only possible if all FSC-certified products are FSC-labelled? Having example sentences with unclear intention only confuses readers. Intention and points of focus must be clear for each example sentences (i.e. why 1st example is OK and second example is not).</p> <p>Comment 6: Regarding the ‘Third-party verification of claims’: Promotional license holders are not customers of certification bodies. It is not practical/realistic for CBs to carry out the percentage verification. If TSP were to carry out percentage verification, the methodology is not clear and so at the moment, I cannot make any comment on capacity/feasibility.</p>
FSC Network Partner staff	<p>"carry the FSC label /are purchased in large quantities/ are not for sale/ have been verified by an FSC trademark service provider. This has brought a few questions: - How these 4 lines should be read : with an 'or' or 'and' in between? What is the threshold to be considered as large quantities? Who define this? That has also brought questions regarding procurement claims for companies that actually sells products. If those requirements were to be kept (except N°3): - what would be considered as large quantities?(do we speak in term of number of references or of volumes?) - What would be the threshold ?(for example, we have a member that promotes all its products in his various catalogues/Internet site, but their FSC products only represent 6% of their total products sold(vs more than 30% of <name omitted>). Shall we prevent them from promoting FSC in their CSR? - How should the threshold be defined and by whom?</p>
FSC trademark service license holder	<p>We feel that definition of the large quantities needs to be clarified.</p>
Promoting ecosystem services sponsorship and assets	<p>Please provide your comments in relation to section 'Promoting ecosystem services sponsorship and assets'. If you wish to be specific, please copy & paste the text to which your comment relates.</p>
Certificate holder, Economic South	<p>"FSC-PRO-30-006 V1-0" The version V1-0 is important here? When this standard will be updated, the FSC-STD-50-001 will be out of date.</p>



FSC Network Partner staff	Further information needed on the documentation required and the verification process
FSC Network Partner staff	A generic company employee will not understand this text. Rephrase the first text: "Ecosystem services represent a range of benefits that people derive from nature. The positive impacts that FSC certification has on ecosystem services can now be verified using the FSC Ecosystem Services Procedure, FSC-PRO-30-006. By making an ecosystem services claim, businesses and governments can demonstrate and communicate the impacts of their purchases, investments and financial support of the conservation and restoration of forest ecosystem services." - It would be helpful to include examples and pictures of ecosystem services claims together with this text. - You also need to write a sentence about what a license holder should do to make an ecosystem services claim. Do they contact their TSP? Or FSC International? Or read the procedure?

'Verification of FSC-certified products'	Please provide your comments in relation to section 'Verification of FSC-certified products'. If you wish to be specific, please copy & paste the text to which your comment relates.
Certificate holder, Economic South	"Promotional licence holders who wish to promote FSC-certified products must demonstrate that the products to be promoted are FSC certified, FSC labelled, and come from a certified source. " - If a product doesnt have FSC labelled but is FSC certified: is there a way to promote this product like FSC?
Consultant	Comment1: the sentence: Promotional licence holders who wish to promote FSC-certified products must demonstrate that the products to be promoted are FSC certified, FSC labelled, and come from a certified source. This is to ensure the products promoted to consumers are indeed FSC certified." As commented in section 5, having products FSC labelled should not be made a condition to be consistant with the new FSC-STD-50-001 V2-0 clause 4.2. "Come from a certified source" imply exclusion of reclaimed materials and/or controlled materials. Proposal for amendment: Promotional licence holders who wish to promote FSC-certified products must demonstrate that the products to be promoted are FSC certified and come from a certificate holder. This is to ensure the products promoted to consumers are indeed FSC certified. Comment 2: "Exemption from the requirement of sourcing directly from an FSC-certified supplier" is now included in step 1 of verification steps and is now only briefly explained. This rule has caused many inconsistent approaches in the past and must be clearly elaborated in the revised guide. i.e. all the conditions must be clearly stated in the guide itself. This is important to improve the transparency of FSC rules. We do not want any more hidden rules (i.e. two links



	back) for only those who happen to know. Comment 3: a term "Step 4" indicates this step is to follow steps 1 to 3. However, this step 4 is completely independent of steps 1 to 3. There should be a separate table for step 4.
FSC International staff	8. Step 2 : " if requested, additional proof that the products are FSC labelled." If the retail wants to omit its suppliers, or use its own brand, how to include them? Verification steps: How to monitor these conditions? What if the supplier has its certification suspended/terminated? What if the scope is not 100% certified?
FSC Network Partner staff	Should be clear in the title that this also refers to approval of artwork. Initial paragraph needs rewording. This whole table needs rethinking, with the input of TSPs who can advise of the reality of any approach. Step 1 is irrelevant and impractical. The text below referring to two-links back should be written somewhere else. State two-links back will be considered on case by case basis. Surely Step 2 is ESSENTIAL (but is incorrectly worded). How do we even verify their list of suppliers without additional documentation? Again, further information needed in relation to ecosystem services documentation - what does an FM certificate code prove? Sampling of evidence box is in the wrong place. Desk inspections would have to be charged for (particularly for the lower fee categories) and this is likely to deter organisations from signing a licence. Allow option of Trademark Use Management System here, as per 50-001. Too much information included on this page - needs a complete rethink. There should be an overriding position that TSPs can dictate the documentation requirements. The suggestion that Step 2 is only "if requested" is likely to mislead users.
FSC Network Partner staff	- Under Section 5, where it says that FSC certified products may be promoted if they have been verified by TSP, write a sentence e.g. "See Section 8 for information on how FSC-certified products are verified". - In the first sentence; add "...must demonstrate to their trademark service provider that..." - The verification steps: You introduce several new concepts here that haven't been introduced before (step 1 - linking back to certified sources; step 4 - is that meant to be self-approval?) Both of these are actually exceptions. Including them in steps here makes the process much more confusing - verification actually has to be done during several phases as needed, not as a step-by-step process! We strongly feel that you should remove the table and explain this in text instead. - The table also includes generic information about the steps mentioned in section 2, but we do not understand the connection. Remove that information here (e.g. under Submitting artwork for approval), and simply explain that when submitting your artwork for approval, this is what you must provide. Much simpler! - Step 1: Linking back to certified sources is an exception, not the rule! It should not be the first thing that is mentioned under Step 1. Under



	<p>step 1 you have not actually written what the license holder has to do, which is to supply a list of certified suppliers together with e.g. a copy of their certificate. - In step 1, change licensee to license holder.</p>
FSC Network Partner staff	<p>This particular example brings worries : " A retailer purchasing arm is not certified but is responsible for purchasing FSC-certified products for the commercial arm of the organization". Could cases be left to the TSP appreciation? Could this particular example be erased? ie : We did ask some entities to get certified, before setting up a TSP licence with the commercial branch, considering the huge amount of references they buy/import from Asia, and sell to the point of sales. If written down, this example could lead to the loss of some certificates (<name omitted>; <name omitted>). As a risk based approach : - In big groups, it could be hard for the commercial branch to get the information and documents if 2 links back were to be set up. - In some certified company, things are done properly not to lose certification. As TSP, we have less weight than CBs. - TSP would have no mean to check huge amount of references and sometimes it could be hard to get the necessary information. That could bring higher risk to get false claims about products promoted as FSC under a TSP licence.</p>
FSC Network Partner staff	<p>I'm concerned about the verification. We would have to have stronger tools, training, and financial cooperation (budget) to guarantee the same application worldwide. The verification described takes big effort, and thus budget from the national office.</p>
FSC trademark service license holder	<p>Section 8 seems to be mainly targeted towards (written for) retailers and brand owners (specified in section 1). For other commercial organizations, it is not clear how to verify our certified products purchase. Is it also considered on case by case basis?</p>
FSC trademark service license holder	<p>As a retailer with thousands of FSC certified wood and paper products in our range and an additional thousands of different packagings carrying the FSC logo, promoting these products/packaging on a daily basis, it is not feasible to keep records and copies of all promotional materials where the FSC Trademarks have been used. However, use of these Trademarks is a routine job, and all promotional uses of the Trademarks look the same. We suggest that samples of materials must be kept for Inspection by the TSP.</p>



'Incorrect use of the FSC trademarks (i)	Please provide your comments in relation to section 'Incorrect use of the FSC trademarks (i)'. If you wish to be specific, please copy & paste the text to which your comment relates.
FSC International staff	Why rotational claim is not allowed? For example, to put the phrase “the mark of responsible forestry” next to the FSC label perpendicularly I would suggest to increase the number of examples in order to facilitate the logo usage in cases with photographic background, I would suggest to consider the examples provided in the document FSC did for positive criteria to FSC Trademark Usage with exclusion zone as ghosted area. Will blanket approval be an option? .
FSC Network Partner staff	Could this text and graphics be aligned with the equivalent section (10) in FSC-STD-50-001? Esp missing item J from this list. What are "trademark files"? Do we mean the artwork, e.g. logo? What does bullet 4 mean? New colour variations are allowed under certain circumstances.

'Incorrect use of the FSC trademarks (ii)	Please provide your comments in relation to section 'Incorrect use of the FSC trademarks (ii)'. If you wish to be specific, please copy & paste the text to which your comment relates.
Certificate holder, Economic South	"implies FSC certification, such as by their use on corporate stationery including business cards and email signatures" - it should be possible to use FSC mark on email signatures with some promotional text or claims, like: 'FSC® is not responsible for the content of any training/consultation/services offered by [name of organization]'. I am saying it because we receive some companies asking why they can't make this use.
FSC Network Partner staff	Suggest using the same wording as in 50-001 for these points (section 2). Especially missing a) loss of credibility. Re-word section - "Promotional licence holders cannot: - apply the FSC labels to any product or packaging - include any information about FSC certification in its sales and delivery documents - use any certificate holder's product labels or promotional panel in any promotional materials."
FSC Network Partner staff	this standard : replace with 'this guide'
FSC trademark service license holder	We would like FSC to introduce possibilities/ways to allow promotional license holders to be able to apply FSC labels on a product/packaging.



<p>'Annex: How to describe FSC and products with FSC claims</p>	<p>Please provide your comments in relation to section 'Annex: How to describe FSC and products with FSC claims'. If you wish to be specific, please copy & paste the text to which your comment relates.</p>
<p>FSC International staff</p>	<p>again, I would suggest to develop a new session for educational purposes.</p>
<p>FSC Network Partner staff</p>	<p>Annex A? Change title to "How to describe FSC and FSC certified, labelled products". Suggested text is often too product specific given that the text is likely to be used for more than one product.</p>
<p>FSC Network Partner staff</p>	<p>- You refer to the Annex as "Annex A" in the text. Put the A in the title too. - You refer to the different labels, 100%/Mix/Recycled. Could be good to explain what the difference between them is? Especially what a smallholder label is - that is not a term widely used outside of FSC.</p>
<p>FSC Network Partner staff</p>	<p>It is normal practice for companies to make general procurement claim for general product types such as "all paper packaging" rather than a specific products. In such cases, it is possibly that FSC certified products of several label types (e.g. mix and recycled) are included in the "all paper packaging". Explanation/Examples for such cases need to be included. Currently in Japan, <name omitted>, <name omitted>, <name omitted>, <name omitted> etc are using phrases such as "By 2020, we will switch all our paper packaging to FSC-certified products which are made from materials originating in well-managed forests". Technically, these paper packaging includes FSC Mix products with FSC mix labels. The DO NOT section of FSC mix labelled products (i.e. Do not say that products carrying the 'Mix' label are made of materials from responsibly or well-managed forests without referring to the other sources used) will technically make such promotional claim unacceptable. This will negatively affect all these companies currently making such claims hugely. This DO NOT section should be "Not applicable" or "Should Not" for companies making procurement claims. This DO NOT section in the FSC-STD-50-001 V2-0 has caused many companies including <name omitted> and <name omitted> to change their explanations used for the FSC mix labelled products they use. This was very costly for them. <name omitted>, a large snack producer in Japan are considering to remove FSC labelled from their certified product packaging because the explanation attached to FSC mix label is now too long to fit in limited space. The whole section of "How to describe FSC and products with FSC claims" was not consulted during the development of FSC-STD-50-001. We need to review the contents of "How to describe FSC and products with FSC claims" thoroughly to assess the impact of existing stakeholders (for both this guide and FSC-STD-50-001).</p>



Glossary	Please provide your comments in relation to section 'Glossary'. If you wish to be specific, please copy & paste the text to which your comment relates.
FSC Network Partner staff	Final consumer/end-user needs defining. Definitions also requested for "FSC labelled", "Strapline" and "Promotional messaging".
References and further information	Please provide your comments in relation to section 'References and further information'. If you wish to be specific, please copy & paste the text to which your comment relates.
FSC International staff	Does the Project standard have to be a reference ?
FSC Network Partner staff	Include the reference to the GlobeScan report here.