

## Consultation report: The new MIX label text and the controlled wood statements

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### 1. Context:

The [Controlled Wood Strategy](#) required FSC to change the MIX label text to reinforce truth in labelling. The strategy also required FSC to introduce fixed statements for licence holders to be able to communicate about controlled wood (CW).

A [technical working group](#) was appointed in November 2019 to propose a new MIX label text and the CW statements. Based on the outcome of a public consultation, the technical working group submitted their final proposal first to the Policy and Standards Committee (PSC) and then to the Board of Directors (BoD) of FSC International.

In June 2020 the BoD approved the working group's proposal of a new FSC MIX label text and fixed statements about CW.

Both changes will become effective in January 2022 after the publishing of the revised Trade-mark Standard (FSC-STD-50-001 V2-1).

## 2. Proposal of the Working Group submitted for consultation

The new proposed MIX label text:

**Current  
MIX  
label**



**New  
MIX  
label**



The proposed Controlled Wood statements:

FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. [link to more information about CW]

FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. FSC controlled wood requirements prohibit and are designed to avoid: illegally harvested wood, wood harvested in violation of traditional and human rights, wood from forests with threatened high conservation values, wood from forests with genetically modified trees and wood from forests converted to plantations or non-forest uses. For more information on FSC controlled wood see [link to more information about CW]

*Note: Minor changes of the syntax are allowed, if they do not alter the meaning of the statements.*

## 3. Stakeholder comments

### Introduction to the consultation

The [public consultation](#) was open from 10 February until 6 April 2020 to collect stakeholders' feedback about the proposed change of the MIX label text and about the controlled wood statements.



165 stakeholders from 45 countries participated in the consultation. The highest number of comments were submitted by stakeholders in the US (14%), Germany (12%), Brazil (7%), Australia (5%), Canada (4%), France (4%).

### Which of the following best describes you?

Certificate holder

32%

FSC Member

25%

Certification body/auditor

13%

FSC Network Partner staff

10%

Consultant

8%

Other

7%

FSC International staff

3%

FSC trademark service license holder

2%

All the main FSC stakeholder groups participated in the public consultation. Regarding the comments submitted by FSC members, most of them came from representatives of the economic chamber (49%), followed by the environmental chamber (29%) and the social chamber (22%).

### 3.1 FSC MIX label text

Stakeholder rating about truth in labelling:



We asked stakeholders if the new proposed label text reinforces truth in labelling. The results are presented below.

**Consultation question:**

Please indicate your level of agreement with the statement listed below. The new MIX label text “Supporting responsible forestry” reinforces truth in labelling.

Strongly Agree / Agree / Neutral / Disagree / Strongly Disagree

**Please indicate your level of agreement with the statement listed below. The new MIX label text “Supporting responsible forestry” reinforces truth in labelling.**

Responses: 129

Agree

24%

Disagree

18%

Strongly Disagree

13%

Strongly Agree

12%

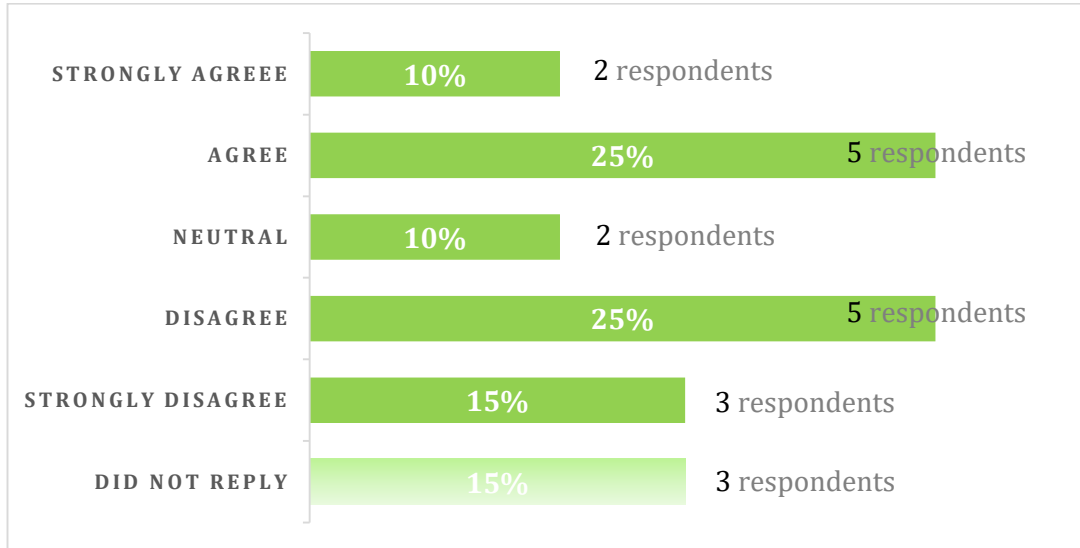
Neutral

11%

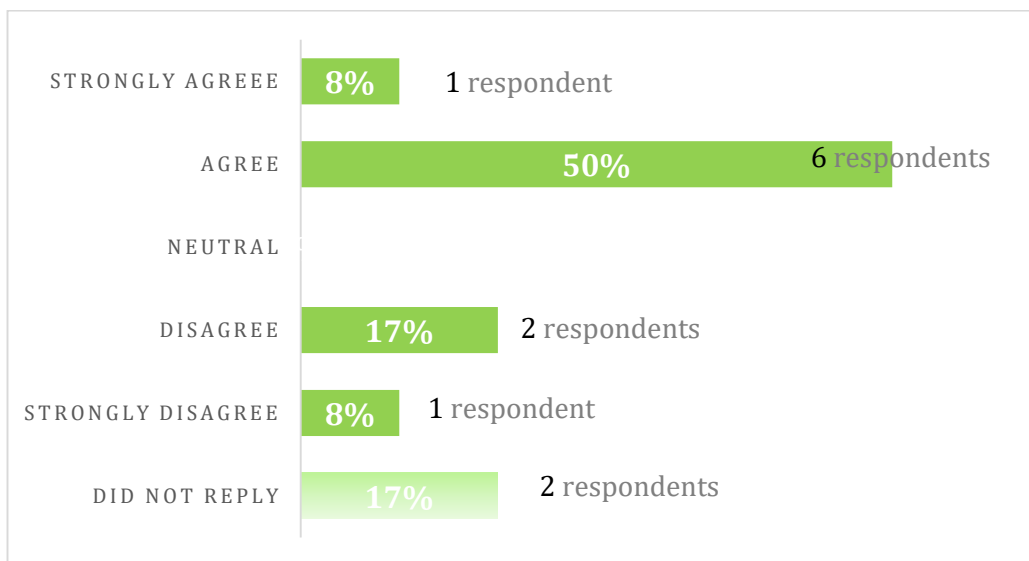
[Did not reply]

21%

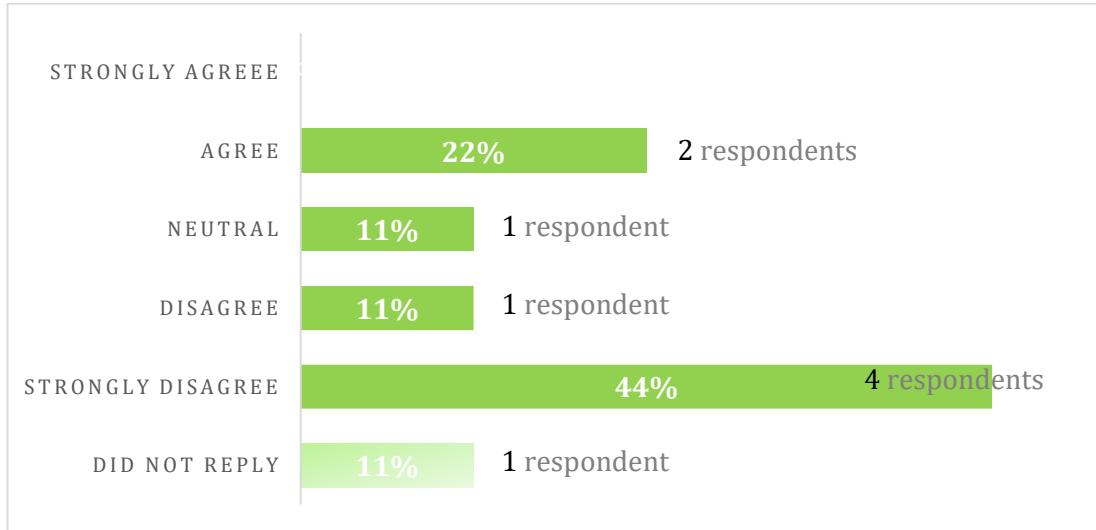
Results - FSC members – **Economic chamber (17 responses)**



Results - FSC members – **Environmental chamber (10 responses)**



Results - FSC members – **Social chamber (8 responses)**



**Explanatory stakeholder comments:**

We asked stakeholders to explain their response to the question above. Here below their comments, organized by stakeholder group.

FSC International staff	it is a good way to increase the products with FSC label.
FSC Member, Social North	The new text is not clear that a large percentage of non-certified material is included
Certificate holder	MIX label text is too literal. "Paper from responsible sources" is too complicated for understanding in Japanese. On the other hand new label is really easy to understand by consumers. It mean we can explain and show off about FSC to consumers and our customer.
FSC Member, Economic North	The label text is true, but it is also somewhat weak. I fear that such weak claim will lead consumers to lose confidence in the FSC label and FSC system
Consultant	The previous statement "[product] from responsible sources" could imply to consumers and users that all components were from certified forests. That is, If they even understood what FSC certification is. It was misleading.



Certification body/auditor	The statement doesn't yet clarify the transparency of the source. To claim that the controlled wood comes from responsible sources is to assume a higher level for this input. In our view, the new statement still doesn't give this full transparency about the source of the material. In fact, in some words this level of transparency is very difficult.
Consultant	The new wording resolves the misunderstanding that the wood used comes entirely from responsibly managed forests.
Consultant	To most observers, the two labels will be indistinguishable. Very few people are interested in this level of minutiae related to FSC labels. While FSC may be keen on these changes, I would say folks are out of touch.
Certificate holder	I do not think that this makes anything clearer to customers. Most customers do not know anything about the paper and forest industry. Such an addendum does only add a level of complication and potential misunderstandings. Additionally, graphically it is not nice with this dash.
FSC Member, Social North	It is far too vague. "Supporting responsible forestry" sounds as though the product is fully certified. Moreover the new wording is not much different from the previous. In other words, the truth is obscured. The "truth" is a long way from being reinforced with this wording.
Certificate holder	In SIG opinion the claim wording is much too weak and vague for an on product claim. It confuses with the wording "supporting responsible forestry". – what is doing this, how is it done, what does it tell to consumers? What is the value for such a claim by taking all the efforts and money to implement a full COC certification? It sounds more like an RECs approach We do not believe that 'supporting responsible forestry ' is what any of the companies in the COC chain do – we invest and actively drive the demand forward for sustainably sourced raw material. We would also like to comment that unfortunately FSC in the past did not follow the idea of the logo motion to simplify the trademark use (one aspect was less logos) but did the opposite by implementing the 2 additional small producer labels.



<p>Certificate holder</p>	<p>At Visy, we believe the proposed change in wording for the FSC Mix label would be misleading and LESS truthful than the current label (the exact opposite of the objective for the change) since many of the thousands of packaging products on which this logo is used are majority (or even 100%) recycled fibre. The statement regarding Controlled Wood "since it is one of the major components of a product with an FSC MIX label" is not necessarily correct. Regardless of Controlled wood content, the FSC Mix logo is used in the packaging industry because there is a mix of Kraft and Recycled inputs in paper and board products. Even Kraft papers have a recycled component (and therefore use an FSC Mix claim). Corrugated cardboard products use a mix of Kraft and recycled papers (which can vary from batch to batch depending on complex scheduling issues within each manufacturing site).</p>
<p>Certificate holder</p>	<p>The chosen word "Supporting" does not describe the claim correct as the product in fact is certified. Supporting states that the product and company just supports FSC, not being certified. The word "endorse" could be a better option.</p>
<p>Consultant</p>	<p>It's all gobbledygook that the consumer pays zero attention to, so say whatever you want. I can almost guarantee you that if you took a dozen FSC environmental chamber members and told them that "responsible sources" was the new language and "responsible forestry" was the old bad language, they would "agree it was a good change that adds clarity". Yet somehow this change is magically going to make the consumer look for the 100% mark? The environmental chamber wants change for change's sake without knowing a damn thing about marketing, consumers, or how markets and consumerism actually work. Feel free to keep fiddling with the logos while Rome burns though. Really just a great use of time and resources. Since a change is "required" by the new CW strategy though, this language is fine.</p>
<p>FSC Member, Environmental North</p>	<p>better than the untruthful current wording but too opaque to be wallet-opening</p>
<p>FSC Member, Environmental South</p>	<p>Nowadays, Controlled Wood standards evaluate only harvest process and when you say forestry, one could think of all the process, like nursery, planting, maintenance, etc. So I think the word forestry would not communicate properly yet.</p>





FSC Network Partner staff	It is not in line with the format of the other labels (i.e. it no longer talks about the source e.g. "Paper from...") and this brings inherent problems with the language structure (how can paper support responsible forestry?). However it does help to address concerns regarding Controlled Wood being considered a responsible source.
FSC Member, Economic North	There will be cases where a known proportion is FSC pure, in solid wood products this may be quite easy to determine and may be very high, in these cases should we be allowing a % claim on the label where the percentage exceeds some percentage e.g. 80%
FSC Member, Economic South	We disagree because currently, at Papirus we use the Moebius Loop and there are approximately 14 different types of labels. Another important point is that we have thousands of these labels in stock. In Brazil, the text "Paper From Responsible Sources" makes more sense for the objective of certification.
Certification body/auditor	The public hardly understand forestry and how would they know what "responsible forestry" is.
Certificate holder	FSC MIX does more than "support responsible forestry" The credit system accounts for FSC certified inputs of which the acquired credits match the outputs. If it is 1 for 1, there is no deception in saying it is from responsible sources.
Certificate holder	The FSC Mix term is ambiguous. However, making minor changes to the label are not helpful. The changes outlined here are not clear either. As per FSC typical communication, it's overly wordy and confusing. There need to be less variation in a label and it should be clear.
Certificate holder	The current declaration does not clarify the transparency of origin, but the new declaration still does not give this total transparency about the origin of the material, which would indicate a new change in the future, and with this, new demands on certificate holders.



<p>Other</p>	<p>While the new words are an improvement on the old version, I do not think the proposal achieves the aims set by the CW Strategy. It does not improve the truthfulness of the label as 1) it does not explain that “Mix” is not equivalent to 100% FSC and 2) only the FSC component can be guaranteed to Support responsible forestry. While the remainder MAY come from sources “supporting responsible forestry” the CW claim does not guarantee that – the claim only says it is of low or mitigated risk of coming from specific, unacceptable categories. In advertising euphemisms or “weasel words” are used to intentionally conceal the truth, making something appear far better than it is. Their key characteristics are that they are numerically vague and passive “voice” instead of direct referencing. The term ‘supporting’ provides us with no information about how the product is supporting FSC (maybe a donation to FSC?), by how much, and how this is assessed. As noted above, without this information the consumer assumes that the product is 100% FSC certified. A large part of the problem stems from the fact that the “FSC MIX” part of the label is itself deceptive. People I have spoken to assume ‘FSC MIX’ is 100% FSC material - coming from a variety of FSC sources (eg plantations and forests). Furthermore, there is a so little FSC100% around that very few people are in a situation to know there is such a thing as FSC100%, so less likely to think about what FSC MIX means. The label must be truthful and self-explanatory. Consumers will not seek and demand FSC100% over FSC MIX if they do not recognise the difference between them. This differentiation is vital if markets are to “increase their demand for FSC 100% and so reduce reliance on CW”. This is the overall objective of the CW Strategy. So, the “FSC MIX” of the label also needs to change, not just the words which follow. The alternative “FSC MIX” label must be self-explanatory and make clear that it is not 100% FSC. Although this could be done in words, it will be much more effective as a percentage label - this will be the most simple, clear, self-explanatory and stand-alone option. Other products use percentages so this is familiar to consumers. While some of the FSC community think it is not possible because of the credit system I have spoken to several senior FSC auditors who do think a percentage approach is a viable option</p>
<p>FSC Member, Environmental North</p>	<p>Better than the current misleading MIX label text, however we doubt if it will send a clear enough message to consumers that this is NOT a FSC certified product, but in fact a low risk product with a possible FSC certified content. Thus we strongly urge to either make the text even more clear in relation to what the consumer in fact is purchasing or alternatively differentiate the label so consumers are not lead to think it is the same as FSC 100%</p>



Certificate holder	99% of FSC people generally want to do the right thing. Mistakes are made, but generally from a simple misunderstanding not a wanton desire to do wrong
FSC Network Partner staff	We do not support the use of the word 'forestry' as it is too closely associated with harvesting only. This undermines the full benefits of FSC certification. The language needs to reflect all aspects of responsible forest managed that are supported by FSC.
FSC Member, Social North	<p>While the new words are an improvement on the old version, I do not think the proposal achieves the aims set by the CW Strategy. It does not improve the truthfulness of the label as 1) it does not explain that "Mix" is not equivalent to 100% FSC and 2) only the FSC component can be guaranteed to Support responsible forestry. While the remainder MAY come from sources "supporting responsible forestry" the CW claim does not guarantee that – the claim only says it is of low or mitigated risk of coming from specific, unacceptable categories. In advertising, euphemisms or "weasel words" are used to intentionally conceal the truth, making something appear far better than it is. Their key characteristics are that they are numerically vague and passive "voice" instead of direct referencing. The term 'supporting' provides us with no information about how the product is supporting FSC (maybe a donation to FSC?), by how much, and how this is assessed. As noted above, without this information the consumer assumes that the product is 100% FSC certified. So – the current proposal I maintain is untruthful. A large part of the problem stems from the fact that the "FSC MIX" part of the label is itself deceptive. People I have spoken to assume 'FSC MIX' is 100% FSC material - coming from a variety of FSC sources (eg plantations and forests). Furthermore, there is a so little FSC100% around that very few people are in a situation to know there is such a thing as FSC100%, so less likely to think about what FSC MIX means. The label must be truthful and self-explanatory. Consumers will not seek and demand FSC100% over FSC MIX if they do not recognise the difference between them. This differentiation is vital if markets are to "increase their demand for FSC 100% and so reduce reliance on CW" which is the overall objective of the CW Strategy. So, the "FSC MIX" of the label also needs to change, not just the words which follow. The alternative "FSC MIX" label must be self-explanatory and make clear that it is not 100% FSC. Although this COULD be done in words, it will be much more effective as a percentage label - this will be the most simple, clear, self-explanatory and stand-alone option. Other products use percentages so this is familiar to consumers. While some of the FSC community think it is not possible because of the credit system</p>



	several senior FSC auditors do think a percentage approach is a viable option.
Certificate holder	"Supporting responsible forestry" is a general statement of good intentions but does not fully represent the end product of a long line of chain of custody controls.
Certificate holder	El texto actual me parece un tanto presto a otro tipo de interpretaciones por parte del consumidor, sobre todo, del tipo de consumidor que no está tan informado sobre FSC.
Certification body/auditor	This will weaken the message of the FSC label and make the consumer even more confused about what the label means. Further it will only then tell partly the truth, since the sources used in mix productions are not only supporting responsible forestry, but the amount or % input must be from responsible sources.
Certification body/auditor	i wonder whether FSC labels should not differentiate silvicultural production systems, at least planted forests, managed natural forests and hybrid systems
Certification body/auditor	The label is intended to speak about the product, not the company placing the label. The statement "supporting responsible forestry" is about a companies actions. The fundamental purpose of the label changes with this new statement from talking about the certified composition of product, to talking about the licensed company. Is this the intention?
Certificate holder	The new text proposal does not make a big difference compared to the current text: Honestly, do consumers understand the difference? This might be important for FSC stakeholders who are closely related to FSC and its Controlled Wood system, but the issue of labelling should be viewed from the market/consumer angle. An increased communication on FSC FM certification and CW and their differences would most probably be more efficient. - Changing all logos in all FSC certified organizations and non-certified trademark users is a huge task and creates significant costs. Therefore there has to be a solid justification for doing this.
FSC Member, Economic North	We agree with the new proposed wording. However we don't agree with several of the assumptions that support this strategy. Obviously that we support the need to increase forest management certification and the use of FSC 100% material, but that doesn't mean that the use of 100% FSC should be promoted at the expense or against the FSC Mix and CW. Forest management certification should be promoted through market promotion and with more suitable tools and requirements for the FM certification



	of smallholders. This is the only way to increase forest management certification.
Certification body/auditor	I do not see the difference between the old and new statement. It is still unclear to the consumer.
FSC Member, Social South	Si bien el nuevo texto es mejor que el texto actual, sigue manteniendo la ambigüedad, y sobre todo sigue siendo un texto no veraz, engañoso; no cumple, por tanto, en lo más mínimo los objetivos que se plantearon en la Estrategia de Madera Controlada.
Consultant	I don't think that this change will be enough to satisfy the differentiation desired by criticals and maybe it will be interpreted just as a minor change that will cost some money to printers. My suggestion is to instead of the phrase "MIX" use the percentage of the product in the seal. More changes will be necessary to differentiate the mix credit from the 100% FSC, maybe we should consider to use the "PURE FSC" again. This idea is not complete yet, but I'd like to plant this seed. Kind regards!
Certificate holder	Why change "from responsible sources" by "Supporting responsible sourcing" it's better before when in the same time you can have FSC recycled fiber from illegal source when wood come from illegal harvesting. One more time FSC reinforce rules regarding CW and the gate is full open for illegal wood recycled : it doesn't make sense. Who will paid to change all brand, packaging and cost to modify, approve and implement new requirement ? it's cost, cost and cost impact.
Certificate holder	Obviously I like the concept of "supporting responsible forestry". But this is more a marketing pitch than a succinct truth-in-labelling statement. A non-expert should at first glance be able to realize what is behind the "MIX" label statement.
Certificate holder	I believe that the new text, "Supporting responsible forestry", is too nebulous to carry any merit. FSC Mix products, from today's definition, all have to be derived from responsible sources. We cannot use a product that is not responsibly harvested in an FSC Mix product. Controlled Wood products either come from the controlled wood forest management certification or from controlled wood chain of custody certification, which should minimize the risk of introducing irresponsible harvesting. Controlled wood, in my opinion, already has minimized the risk, and could be said to have come from "responsible sources".



Certificate holder	Better wording from an FTC standpoint in US. Will this pass muster in US. FSC should consult directly with the Federal Trade Commission in US to understand how Greenguide updates effect this strategy. <a href="https://www.ftc.gov/news-events/media-resources/truth-advertising/green-guides">https://www.ftc.gov/news-events/media-resources/truth-advertising/green-guides</a>
FSC Network Partner staff	More me this "supporting" message on a label is blurred coms. It might remove the "problem" concerning responsible sources vs. Controlled Wood, but I think it creates a new problem: a unclear statement about what is in the product and could indicate that you as a buyer support a specific replanting project or alike individual project. I would say that the criteria of transparency, accuracy and relevance is not met to a satisfactory degree.
FSC Member, Environmental North	clear difference in communication of FSC 100 and FSC Mix. FSC Mix is from less value from an ecological perspective supporting is still too positive
FSC Member, Economic South	Still not full truth in labeling and not distinguishable enough from FSC 100%
FSC Member, Economic North	The logic of the new text is well explained. While there might not be 100% of the product component coming from FSC certified forest, the rules behind the use of the label make sure that the equivalent amount of wood is purchased from certified sources and therefore the product supports responsible forestry.
FSC Member, Economic North	We have questions about this new wording in which the notion of "renewable resources" is lost because it is a very important subject in terms of circular economy which is at the heart of current debates and regulations. Moreover, this wording is not clear to a consumer and we find that it weakens the commitments made by actors who do not use recycled material such as beverage cartons producers.
Other	De acuerdo con lo que se propone



FSC Member, Economic North	The new text proposal does not make a big difference compared to the current text. Changing the label text may be important for FSC stakeholders who are closely related to FSC and its Controlled Wood system, but the issue of labelling should be viewed from the market/consumer angle. Honestly, do consumers understand the difference? An increased communication on FSC FM certification and controlled wood and their differences would most probably be more efficient. - Also customers who recognize the new label can get confused and extra effort is needed from FSC to explain the change. - Changing all logos in all FSC certified organizations and also in non-certified trademark users is a huge task and creates significant costs. The change from FSC mixed to FSC mix few years ago was a huge workload to certificate holders, and people got annoyed putting significant effort because of a cosmetic change. Therefore, there has to be a solid justification for doing the change.
FSC Member, Economic South	Because it concerns the forest as the whole and therefore covers all the forest resources
Other	It looks it is serving the objectivity of FSC
Certificate holder	Es la primera vez que leo el término "silvicultura". No tenía conocimiento de su existencia. Creo que, en vez de aportar veracidad, aportará mayor sensación de desconocimiento a los consumidores finales.
Consultant	While I believe this to still be somewhat misleading it is a lot less misleading than the current text if this was tied to a percentage claim I believe it would further improve it
FSC Member, Social South	No refleja la esencia de la etiqueta mixta, es un texto ambiguo y poco claro respecto al objetivo de la estrategia
Other	Some members feel that this new statement is more accurate, however others do not. Those who do not refer back to the strategy: 1. Introduction, page 6: The document throughout states that the use of the FSC Mix label is always associated with the use of Controlled Wood. This is fundamentally incorrect and shows a lack of operational understanding by FSC International on how their Chain of Custody process actually works for fibre packaging manufacturers. It is proposed that there should be one label only 'FSC Certified' and it is at the discretion of the certified organization to put additional commentary on ie. Recycled. This label is a consumer facing product and therefore should be simplified. Consumers



	do not easily navigate the many labels FSC offers. A reasonable (and lengthy) implementation period would be required.
FSC Member, Environmental North	The correct approach in the FSC-mix system should be enforcing the requirements of labeling material or products as FSC-mix. Current label is bad as the practically non-existing control on whether the material and products with FSC-mix claim in reality come from sources that are acceptable, ensures that the claim in the label is false - currently sourcing from "unacceptable sources" is "business as usual" in the FSC-mix chains of custody. Just changing the text in the label would just underline that for FSC-international it is completely OK that also in the future the FSC-mix system is a such a huge means of greenwashing as it currently is.
Certificate holder	Please be aware that a change of any aspect of the label will create costs to implement these changes. E.g. All printing plates must be changed for this reason. In my view a normal consumer will not understand this small differences.. I do not understand at all that the label text must be changed.. For me this topic is only something for FSC COC experts, but not the normal consumer and will not change anything... This will create a lot of work and cost for many certificate holders.. For me both texts ( old & new) are more or less the same...
FSC Member, Economic South	The current wording don't say that CW is certified.
FSC Member, Economic North	I can understand both trains of thought on this but do feel that label recognition is so minimal that this change will have relatively little impact to the market. If it has impact to the ENGO stakeholders and this is dropped for the next 10 years I see that as a benefit enough to make the change. Once this change is made any impact should be tracked and the subject should be left alone for a minimum of 10 years in order for FSC to better use resources on other items that are more important.
Certification body/auditor	I disagree the change because it is still not informing the real content of the product (composition). "From" or "Supporting" the change is not meeting the main objective. I can support but due to economic constraints I don't do what I support. This happens quite often; how many companies have politics and vision etc, and in the field the reality is totally different from the compromise. I think that COC standard could have a clause where they have to show an effort to increase the % of FSC 100% on the long term (at least 5 years). The other problem is the availability of FSC 100% materials, and the MIX is thus important to increase





	the quantity of certified materials available (mainly for pulp and paper) but the final consumer can be cheated and even more because when they see the check-mark-and-tree logo it is sufficient for them. Education of final consumer is part of the solution, the pressure (as usual) will then come from the consumer to have more FSC 100%. Today most of the companies want sell FSC 100% with higher price than other categories, and of course that doesn't help to increase the FSC 100% expansion if the final consumer will not pay more for this material in comparison with FSC Mix.
Certificate holder	The new wording resolves the misunderstanding that the wood used comes entirely from responsibly managed forests.
FSC Member, Economic North	contains also timber from responsible forest Supporting is still to positiv for the customer as well as for the retailer
Other	Certificate may be considered serious only if it is "Yes/No" i.e. Certified / Not certified. All "mix" procedures make the main label incredible
Consultant	Likely to be largely ignored and quickly forgotten.
FSC Member, Environmental North	end buyers and costumers want to know the ORIGIN of the material they are buying and using. the FSC label gives them a traceability to the tree that the product was made from, not to the owner of the forest unit
FSC Member, Economic South	Estoy de acuerdo con el análisis del GTT
Certification body/auditor	Final consumer do not read such in details the labels. Changes in the trademarks affect only certified holder that has to change label even when re-print same materials and ask again approval to CABs. The consumer see the tree and the FSC acronym, but not all the sentences and for sure do not understand the difference. For the consumer or it is certified or it is not!
Certification body/auditor	I doubt the difference will be perceived but I am ok with the proposed change
Certificate holder	I like that the label references responsible forestry, as that is the activity that that FSC is focused on influencing.



FSC Network Partner staff	This solution does not solve the problem since it is not however in line with the aim of the change, because if on the one hand it is "simple, short, positive" on the other it is not yet "truthful and accurate, transparent, relevant, clear": - does not explain what inputs are in the product - the consumer does not get a message so different from the current one - to clarify if there will be a single declaration for any type of FSC MIX (whether it is a mix with recycled inputs or with Controlled Wood)
Certificate holder	It is a very nuanced difference that will go largely unnoticed. CW does not really support responsible forestry, it avoids controversial forestry.
FSC International staff	It is a very simple solution to CW complexity. I'm curious to see whether it will be accepted.
FSC Member, Economic South	I think that "building client confidence on the sourcing of FSC products from responsible forestry" is the key. The statement "supporting responsible forestry" doesn't reflect on that. It's too vague, lack of precision and is not a qualitative information on the product.
FSC Network Partner staff	The distinguishing graphic element is somewhat strange and difficult to understand
Certificate holder	The new proposition is less accurate as it is very general and doesn't say anything about the product. "Paper from responsible sources", on the contrary, tells us something about the product and is therefore more adapted.
Certificate holder	The new declaration still does not give the total transparency about the origin of the material. This can indicate a new change in the future and new demands on certificate holders.
Certificate holder	The new text proposal does not make a big difference compared to the current text. The issue of labelling should be viewed from the market/consumer angle, and I doubt whether the consumers would understand the difference. Moreover, customers who recognize the new label can get confused and extra effort is needed from FSC to explain the change. From the CH point of view, changing all logos in all FSC certified organizations and also in non-certified trademark users is a huge task and creates significant costs. Therefore, there has to be a solid justification for doing the change.



<p>FSC Member, Economic North</p>	<p>The new text proposal does not make a big difference compared to the current text. Changing the label text may be important for FSC stakeholders who are closely related to FSC and its Controlled Wood system, but the issue of labelling should be viewed from the market/consumer angle. Honestly, do consumers understand the difference? An increased communication on FSC FM certification and controlled wood and their differences would most probably be more efficient. - Also customers who recognize the new label can get confused and extra effort is needed from FSC to explain the change. - Changing all logos in all FSC certified organizations and also in non-certified trademark users is a huge task and creates significant costs. The change from FSC mixed to FSC mix few years ago was a huge workload to certificate holders, and people got annoyed putting significant effort because of a cosmetic change. Therefore, there has to be a solid justification for doing the change.</p>
<p>FSC Network Partner staff</p>	<p>The new statement reinforces the truth in the case of products made of FSC fibers and CW fibers. However, the effort of transparency should take into account MIX products that are partly made of reclaimed materials. "Supporting responsible forestry" can hardly be associated with reclaimed fibers, since recycling have no direct link with the forest management. Recycling is only linked to forest preservation through the reuse of materials, decreasing the demand of virgin fibers. Labels texts should also be user-friendly and mainly targets final consumers. A text like "[Product type] Help to safeguard our forests" is easy to understand, and take into account the reality of the three inputs: FSC fibers, CW fibers and reclaimed fibers.</p>
<p>FSC Member, Environmental North</p>	<p>This is aligned to the CW global strategy</p>
<p>Certification body/auditor</p>	<p>I think the new text itself is fine, but having the product on a separate line will make the product and text are more readable</p>
<p>Certificate holder</p>	<p>The current declaration does not clarify the transparency of origin, but the new declaration still does not give this total transparency about the origin of the material, which would indicate a new change in the future, and with this, new demands on certificate holders.</p>



<p>Certificate holder</p>	<p>Acreditamos que alteração trará mais impactos negativos do que positivos, seguem alguns pontos:</p> <p>Impactos econômicos nas empresas, pois terão que alterar o selo na maioria dos casos é necessário a troca de materiais/ferramentas que geram custos as empresas. Acredito que não é necessário, muito menos no momento que hoje estamos vivendo globalmente. Caso a alteração siga, acredito que deve ter um prazo grande para adequação para que as empresas possam distribuir os custos ao longo do tempo.</p> <p>Sabemos também, que as alterações que precisam ser feitas nos materiais/ferramentas para troca de selo, geram impactos negativos na geração de resíduos, pois novas artes precisaram ser desenvolvidas, teremos mais custos e toda interface com a cadeia de clientes para liberação , aprovação das novas artes.</p> <p>Lembrando que existem situações onde, alguns produtos tem a sua arte registrada em órgãos oficiais o que levaria a uma necessidade de nova aprovação dessa arte, o que pode levar muito tempo.</p>
<p>FSC Member, Social South</p>	<p>The suggested option still remains misleading. It does not show much difference between FSC 100% and FSC MIX used in the product.</p>

### Additional comments about the MIX label text

See below additional comments submitted by stakeholders in relation to the new proposed MIX label text.

#### Consultation question:

Please provide additional comments in relation to the new MIX label text proposal. NOTE: The CW Strategy requires a change to the MIX label text, so recommendations not to change the text cannot be considered.

<p>FSC Member, Social North</p>	<p>It would be better to say 'xx% FSC Certified'</p>
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Consultant	I spent years in Marketing and spent years working on brand recognition. In my case NZ lamb on the Middle East. We had a Hell of a job with messaging within the brand (what your talking about). In our case Halal. We were not successful without constant and expensive reinforcement. FSC has a brand and fair brand recognition. That does not extend to messaging. It's just the brand no one will look at the message. So all you will get is truth in labelling at vast expense and difficulty at the CoC level but no one will take any notice. Messaging will not drive change and you can't change the logo without distorting the brand recognition. Sorry to be negative but we need an internal way of moving to 100% FSC. POS messaging won't work and will be a nightmare to implement at the COC level. RSPO is working with end users to move to Segregated rather than Mass Balance as a better way of mitigating reputational risk - with some success.
FSC Member, Economic North	Anyone can "support" responsible forestry, to me, this does not mean any added value to the product. Seeing as the label can only be used on an equivalent amount of FSC certified material, I believe the label should be able to have a stronger claim.
Consultant	The new label wording is somewhat awkward but there really is no option to merge the product type with a statement like on the previous label. Consumers came away with the understanding that the label, with an implied certification having to do with responsible sourcing, was tied to a Paper product (or whatever they bought). Maybe capitalize the product type on the new label to further highlight that some degree of "certification" or the seal of approval of the label refers to PAPER, or WOOD (or whatever). Without a specified product type will labels just read "Supporting responsible forestry"?
Certification body/auditor	The added graphic element may make sense in theory, but from the consumer's point of view this element will not be clear and doesn't add understanding to the stamp. The consultation doesn't make it clear whether the reduced/mini label will also change, as it doesn't have the text of the declaration in content. In addition, the best translation available for this statement in Portuguese will be required, such as "Apoiando fontes responsáveis".
Certificate holder	assure that sourced material is from responsible forestry
Consultant	The new formulation is much better than the old one, as it establishes a link with responsible forest management (previously only "sources").



Consultant	This looks like more change for the sake of change. Most certificate holders are beyond weary of the change and complexity of the FSC system, especially Controlled Wood. Mandating further changes, and in this case potential meaningless changes (from the view of CHs and consumers), risks further disenfranchising the community at large.
Certificate holder	I would omit the graphic separation. It is not clear to me why this separation is necessary. From my point of view FSC should stick to the term “controlled”. CW is controlled wood not sustainable wood. I would suggest: “Product Name supporting controlled forestry”
FSC Member, Social North	At least, in percentage claims, the percentage could be stated. For the credit system, it is so open to manipulation that not even a percentage can be defined! In extreme cases, there could even be NO 100% certified in the product. So two different Mix labels could be designed, one for percentage and another for material via the credit system
Certificate holder	The “Mix” should be included as it indicates truthful that something was mixed via mass balancing procedure which ensures that 70%/100% of the fibers connect to FSC certified forest input and should be used to differentiate from the 100% label. The product type e.g. “board” has value to be added for clarification what is certified especially to differentiate when more materials are used in a product or to avoid confusion between packaging material and the content in the packaging. I would than simplify the claim by leaving out the explanation “... from xxx, supporting xxx” which no normal consumer anyhow understands and would add instead a statement on top below the tick tree what FSC is about. This would lead to a claim which looks the following from top to down: Tick tree logo www.fsc.org Responsible Forestry Mix Product type Licence number
Certificate holder	Visy propose that there should be ONE label only 'FSC Certified' and it is at the discretion of the certified organisation to put additional commentary on i.e. Recycled. We believe this would be much simpler and easier for the consumer to understand. Our experience is that consumer does not understand the difference between FSC 100%, FSC Mix or FSC Recycled, particularly with regard to packaging materials.
Certificate holder	Is it worth changing the label statement compared to the additional costs for companies who must change the printing of the logo on their products? Should all labels be overseen at the same time as the Mix-logo are changed? For ex. "FSC Pure" describes the content of FSC 100% better than todays logo, which would also benefit the strategy of FSC CW.



FSC Member, Environmental North	I would suggest the more eye-catching and slightly humorous 'Paper / From barely legal sources' but that does not cover four of the five unacceptable of Controlled Wood. FSC should engage an advertising agency to advise on more comprehensively-truthful wording.
FSC Member, Environmental South	In my point of view, the text proposal is little, just change two words. For me when consumers choose a FSC product they go more for FSC trademark, so maybe would be interesting give different color for mix products labels.
Other	I agree with the change of the text, as it does show the benefit of FSC Mix. It supports responsible forest management.
FSC Member, Economic South	The Papyrus's option is to keep the label the same way.
Certificate holder	How about "Sustainably sourced [paper]" or "Responsibly harvested [paper]" instead? The old text is also just fine. The change implies that CW is inherently not responsible as it is not certified. This may be true in some countries, but certainly not where the legal and regulatory framework renders these concerns largely moot (ex: US and Europe) As to recommendations not to change the text: Consider an organization that cannot say "no" to itself to be irreparably broken. FSC, are you listening to your stakeholders who help keep the lights on, or just checking boxes? The only real solution for scaling FSC is to increase consumer demand. Supply will follow that. The reverse strategy will most likely mean less supply as companies tire of the constant churn and abandon the program altogether. I fear that FSC does not understand what pressures these initiatives place on smaller certificate holders.
Certification body/auditor	Now it is not very nice how Product type (paper) and statement (Supporting responsible forestry are separated. Maybe they could be a more elegant ways to do that.
Other	As noted above I recommend replacing the FSC MIX label with a Percentage label and a "Moving Towards FSC" label as follows: 1. For organisations using the percentage system: "FSC 70%" This product contains at least 70% FSC certified material. (Optional addition: The remainder is assessed by FSC auditors to be of low risk of originating from unacceptable sources. Or more simply: The remainder is Controlled Wood. See link for more information) 2. For organisations using the credit system: "MOVING/WALKING TOWARDS FSC" (Caminando



	<p>hacia FSC) This Product Line contains x% FSC material (Optional addition as above) OR (Company name ____ ) supports FSC. Of our total fibre/timber purchased, x% is FSC certified As a last resort I would reluctantly accept: FSC MIX – This product contains non-FSC certified material known as Controlled Wood - with link explaining CW. These are suggestions. I encourage the TWG to 1) consult with other certification schemes and experts working in the field of certifying mass balance and multi-ingredient certification products on effective methods to include percentages on labels; 2) consider further consultation with practitioners and the membership to produce a label which truly reflects the content of our products.</p>
FSC Member, Environmental North	<p>We recommend that the text better reflects what the label actually can deliver on, which is "Low Risk of controversial content" which could be combined with "Supporting responsible forestry". Most consumers would not be able to understand what "supporting responsible forestry" actually means, whereas Low Risk of controversial content" is very clear and easily understandable for consumers.</p>
Certificate holder	<p>I support it fully</p>
FSC Network Partner staff	<p>The separation element as it is in the example label is confusing and should be replaced with a clearer separation. We do not support the use of the word 'forestry' as it is too closely associated with harvesting only. This undermines the full benefits of FSC certification. The language needs to reflect all aspects of responsible forest managed that are supported by FSC. We recommend that the label text remain as it is (i.e., from responsible sources) until a better alternative is developed.</p>
FSC Member, Social North	<p>As noted above I recommend replacing the FSC MIX label with a Percentage label and a "Moving Towards FSC" label as follows: 1. For organisations using the percentage system: "FSC 70%" This product contains at least 70% FSC certified material. (Optional addition: The remainder is assessed by FSC auditors to be of low risk of originating from unacceptable sources. OR if this is too many words for a label - The remainder is 'Controlled Wood'. See link for more information) 2. For organisations using the credit system: "MOVING/WALKING TOWARDS FSC" (Caminando hacia FSC) This Product Line contains x% FSC material (Optional addition as above) OR (Company name ____ ) supports FSC. Of our total fibre/timber purchased, x% is FSC certified. OR The idea in both of these options is for there to only be a claim about the FSC content. If the organisation wishes to, they can also explain the remaining content but obviously this will extend the length of the label. In both these labels the FSC logo should be smaller than the</p>





	<p>descriptive words. Alternatively, and as a last resort I would reluctantly accept a single label saying: “FSC MIX – This product contains non-FSC certified material known as Controlled Wood*” (this would be linked to an explanation about CW). Unfortunately, as long as it is allowed that products through the credit system can be labelled, even though they may not contain ANY FSC material, such a label CANNOT say ‘This product contains FSC and non-FSC certified material’. This COULD be possible if, as part of this label and CW implementation process, a new requirement was introduced such that ANY product with an FSC MIX label must contain a minimum fixed percentage of FSC certified material (which is regularly increased, say on an annual basis). – This would be a worthwhile idea for the TWG to develop together with the CW implementation team. Such a mechanism would be one step to incentivize the shift to increasing FSC certification as required by the CW Strategy. These are suggestions. I encourage the TWG to 1) consult with other certification schemes and experts working in the field of certifying mass balance and multi-ingredient certification products on effective methods to include percentages on labels; 2) consider further consultation with practitioners and the membership to produce a label which truly reflects the content of our products.</p>
Certificate holder	<p>El nuevo texto es completamente más puntual sobre el papel que realmente desempeñan las organizaciones que poseen un certificado y emiten este tipo de declaración en sus etiquetas.</p>
FSC Network Partner staff	<p>I like the new label very much, it is good that "MIX" claim stays the same. The only thing I would like to ask for consideration is how text of new label will look like after translation into other languages. As native Polish speaker I am not really sure how to translate it properly, especially verb "supporting". If it was one sentence: Paper supporting responsible forestry" it would be easy to translate. Maybe we could think of "Paper / (It) Supports responsible forestry" ...?</p>
Certificate holder	<p>We would like to keep current FSC Mix label text, but if that alternative cannot be considered we suggest following wording instead of using word Supporting: “Product type”   Contributing responsible forestry</p>
Certification body/auditor	<p>I do not agree with this. If required an extra statement can be added outside the logo.</p>
FSC Member, Social South	<p>Se discrepa con la opinión del GTT. El nuevo texto está muy lejos de ser “veraz y preciso, transparente”, tampoco es "pertinente, claro en cuanto al alcance y coincidente con la estrategia FSC.” Como se mencionó, no responde a la Estrategia de Madera Controlada que plantea y</p>



	<p>promueve el incremento de la certificación del manejo forestal y el uso de material 100% FSC, y, por tanto, la reducción en el uso de MC. Un texto que asegura que se está “apoyando la silvicultura responsable”, no está promoviendo FSC FM, al contrario, se está “insinuando” que la producción y consumo de productos mixtos es suficiente, y no hace falta avanzar hacia FSC 100%. La etiqueta no aclara qué significa un producto mixto y cuál es la diferencia con FSC 100%. Como todos sabemos, Madera Controlada mitiga riesgos en 5 categorías, no asegura una silvicultura responsable en función de los PyC del FSC. Se seguirá pues, poniendo en riesgo la credibilidad y "aceptando" una competencia desleal. Si en realidad se intenta cumplir con la Estrategia de MC y el PEG, el texto de la etiqueta debe dar la información pertinente al consumidor, a fin de que se pueda diferenciar entre la etiqueta FSC 100% y la etiqueta Mixto. Por tanto, se propone que se incluya en la etiqueta el % de material FSC, además de incluir un nuevo texto más claro y veraz que aluda a esa diferencia y no que refiera a una intención. Se recomienda que se consulte a otros expertos en etiquetado que utilice porcentajes y en comunicación o publicidad.</p>
Certificate holder	<p>I suggest some short or succinct statement including what "mixing" is about, i.e. responsible (or certified) + acceptable (or non-controversial): "MIX - Paper from mixed responsible and acceptable sources"; Or: "MIX - Paper from responsible and acceptable sources"; Or simply: "MIX - Responsible and acceptable sources".</p>
Certificate holder	<p>This is the most humane way to move forward. The other "incentives" seem unrealistic.</p>
FSC Network Partner staff	<p>I don't understand why stakeholders / members do not perceive CW as responsible source and why they think "supporting res. forestry" is better. I know you cannot use this comment, so just a frustration from me personally.</p>
FSC Member, Economic South	<p>Find a way to put place clear on the label what it actually is, ie at least 70% FSC FM and at most 30% CW material. That is truth in labelling, and that will give a sufficiently clear comparable link with FSC 100% with the chances to promote FSC 100% over FSC MIX.</p>
FSC Member, Economic North	<p>We should add the % of recycled content for products using this label that incorporate recycled material. We should have a look on the evolution of legislation on environmental mention that is moving.</p>
Other	<p>El nuevo texto es más amigable y está acorde con la estrategia de FSC</p>



FSC Member, Economic North	Our strongly preferred option is to keep the current FSC Mix label for the above-mentioned reasons. In case the label change is considered so essential that it can not be canceled, we suggest following wording instead of the current proposal of Supporting responsible forestry: "Product type"   Contribute to responsible forestry
FSC Member, Social South	El texto debe reflejar que solo parte del material proviene de fuentes responsables. Debe ser un texto que haga mención al origen del material no a una intención o política de apoyo a uno u otro manejo.
FSC Member, Environmental North	"Supporting responsible forestry" would be fine if the requirements of the FSC-mix system were enforced also in the field and not just on the paper. In current situation "Believe or not" would be truthful labelling.
Certification body/auditor	Maybe "Paper from responsible sources, some certified"
Certificate holder	The new formulation is much better than the old one, as it establishes a link with responsible forest management.
FSC Network Partner staff	I however think the wording 'supporting' is a complicated wording. As, even though it is now split by a line, the suggestion paper supports responsible forestry is a politically complicated statement as in many cases paper does not support responsible forestry.
Other	proposal: "MIX - incredible FSC logo"
Consultant	Sadly - This is a nice-sounding idea with little or no chance of real success.
FSC trademark service license holder	Package text labels Do you want to change it?
FSC Member, Economic North	No
Certification body/auditor	Since you have already decide to change it, no other comments. Please note that have different type of FSC label only confuse the final consumer
Certificate holder	I support the proposed new label.



FSC Network Partner staff	Remember that: - within the Label Generator there is also the possibility for CHs to omit this descriptive phrase for their label. - this change will ask the CHs to modify the various label settings they already have in place. It will however be a necessary thing, because the MIX label will in any case be changed sooner or later. But it is to be considered that this change will add to other changes that seem to be taking place for the CH (database update, fee revision, ILO criteria...).
FSC Network Partner staff	Paper that supports responsible forestry MIX Paper Supporting responsible forestry
Certificate holder	<p>The transition must be slow and very well explained, so as not to be the opposite effect of companies simply decide to remove the FSC seal from their products, or use the mini / reduced seal.</p> <p>Changes to the seal can cause impacts for certificate holders:</p> <ul style="list-style-type: none"> <li>• Economic impact on companies in relation to changes in the seal, due to the need to adapt each printing tool (cliches) - this cost can be diluted if the adaptation period is long, but it can generate impacts on the economic sustainability of the product</li> <li>• Some products have their art registered in official agencies (like ministry of agriculture), which would lead to a need for new approval of this art, which can take a long time, and even if customers request the removal of the seal</li> <li>• Need for the elaboration of new arts, new approvals of these arts with all customers, and making of tools that require time and efforts from different teams</li> <li>• Waste generation due to printing tool change. The waste has restrictions regarding recycling and there would be an increase in costs related to this recycling or even disposal of waste, which may impact the sustainability of products</li> <li>• Another point may be the migration to the mini / reduced seal, as it does not have the declaration in its content, or the removal of the seal of the product</li> </ul>
Certificate holder	We would prefer to keep the current FSC Mix label for the earlier-mentioned reasons. In case the label change is considered so essential that it can not be canceled, we suggest following wording : “Product type”   Contributing to responsible forestry



<p>FSC Member, Economic North</p>	<p>Our strongly preferred option is to keep the current FSC Mix label for the above-mentioned reasons. In case the label change is considered so essential that it can not be canceled, we suggest following wording instead of the current proposal of Supporting responsible forestry: “Product type” I Contribute to responsible forestry</p>
<p>FSC Network Partner staff</p>	<p>With the current MIX label rules, brands and consumers cannot identify the actual content of reclaimed materials present in the products or packaging. The percentage of reclaimed material inside FSC MIX products should be a compulsory element of the label. The optional Moebius loop currently in use in FSC MIX and FSC Recycled labels is too vague and should be accompanied by an textual claim, as recommended by the ISO 14021 norm. The symbol is used for both recycled and recyclable materials, leading to an incomprehension of the consumers. Furthermore, the percentage of reclaimed content is currently written under the Moebius loop in FSC labels, whereas best practices recommend to include the percentage inside the loop. New regulations will also uniformize the use of environmental labels and claims in the next years in some countries (such as the loi économie circulaire in France). FSC should pay a close attention to the national and regional regulations on reclaimed claims; there is a risk that those new legislations would make illegal some aspects of the FSC labels (or make mandatory additional information to support environmental claims). It would be interesting to ask Matteo if there are any coming changes in EU regulations regarding environmental claims and labels. To be able to give a full the information on a product composition, the percentage information of reclaimed materials inside FSC MIX products should be passed through sales documents. In the case of primary packaging used in contact with food, the use of reclaimed material is forbidden, and we had some questions of brands wanting to know how they can make sure that FSC MIX labelled packaging are only made of virgin fibers. Trademark Service license holders should also know the composition of MIX products (in terms of FSC, reclaimed and CW fibers through the sales documents they get) to make reliable marketing statements, and to better inform consumers.</p>
<p>Certificate holder</p>	<p>Changes to the seal can cause impacts for certificate holders:</p> <ul style="list-style-type: none"> <li>· Economic impact on companies in relation to changes in the seal, due to the need to adapt each printing tool (cliches) - this cost can be diluted if the adaptation period is long, but it can generate impacts on the economic sustainability of the product</li> <li>· Some products have their art registered in official agencies (type</li> </ul>



	<p>ministry of agriculture), which would lead to a need for new approval of this art, which can take a long time, and even if customers request the removal of the seal</p> <ul style="list-style-type: none"> <li>· Need for the elaboration of new arts, new approvals of these arts with all customers, and making of tools that require time and efforts from different teams</li> <li>· Generation of waste due to printing tool change. The waste has restrictions regarding recycling, and there would be an increase in costs related to this recycling or even disposal of waste, which may impact the sustainability of products</li> <li>· Another point may be the migration to the mini / reduced seal, as it does not have the declaration in its content, or the removal of the seal of the product</li> </ul> <p>We believe that the impacts will be great in several units, as these changes will be sources of too much economic increase and greater generation of waste. We hope that these observations will be considered.</p>
<p>FSC Member, Social South</p>	<p>I think that the most clear and self-explanatory option would be statement of percentage of FSC certified wood on the label. Something like " FSC 70% and MIX of low risk CW".</p> <p>It will really show Truth in Labeling. Also, the color of FSC MIX label can be different from FSC 100%? Not green, but, say, yellow. It will attract buyers' attention to the contents of the label.</p>

### 3.2 Implementation process for the MIX label text

We asked stakeholders for their comments on the process for implementing a new MIX label text; the comments are presented below.

#### Consultation question:

The implementation plan for the new label's roll-out is not yet agreed. If you have suggestions for the working group, such as about the transition period, please share them here.

<p>FSC Member, Social North</p>	<p>The new label should not be rolled out until changes as above are agreed.</p>
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Consultant	Forget any link to the CW strategy. Reducing CW needs and increase in uptake of FSC certification. That's a different strategy. Please realize that there is no PUSH in FSC there is only Pull. You cannot change a label and expect it to push people to FSC certification.
Consultant	There should be an adequate period of time for transition and having CBs not write up non-conformities for "old" labels. Especially in the case of recurring print jobs where clients and printers may not anticipate the need to redo artwork and resubmit them for CB approval, Not sure what is adequate, 1 year? This would support the practice of recommending CH's submit even recurring work at least annually to make sure that everything is still being done properly. The reasons for the label changes should be clearly communicated to CHs. During a transition period both labels should be available on the TMK portal with clear notices that current labels are being phased out and will not be available on x date. Maybe something about developing and submitting all uses of new MIX labels for CB approval by a certain date too.
Certification body/auditor	The transition must be slow and very well explained, so as not to be the opposite effect of companies simply deciding to remove the FSC label from their products, or choose to only use the reduced label. We spoke with some companies that demonstrated how changing the FSC label could financially affect the production of FSC products. Therefore, we suggest that the transition period consider the amount of products already produced and be at least 2 years.
Consultant	Please keep in mind that changing layouts can cause very high costs. The transition phase should be correspondingly long. Unchanged re-prints should continue to be permitted with the old design, even after the implementation of the new one.
FSC Member, Social North	It needs a thorough revision so regrettably at least 18 months would be needed (including for a communication strategy to be developed).
Certificate holder	An accompanying communication is needed which explains why the label changed A transition period of min. 12 months is needed to allow a smooth transition. Existing products / packaging decors / printing cylinders needs to be allowed to show the old label. Decors and printing cylinders must be allowed to use the old label until planned updates to avoid unnecessary extra costs and to avoid reactions to drop the Label use in total.



Certificate holder	Changes to labels, if mandated, would be a very costly process for many organisations, such as Visy, who have hundreds of products using the FSC Mix label. FSCI would need to carefully consider this by engaging meaningfully with Economic Chamber stakeholders. A reasonable (and lengthy) implementation period would be required, preferably with an allowance for existing artwork to carry the old label until such time as an artwork change (for other reasons) is conducted (potentially several years).
Certification body/auditor	I believe there should be a grace period to exhaust existing stock since many printers preprint and may have stock for a length of time.
Certification body/auditor	Para períodos de transición dejar al menos 12 meses de plazo, dadas las dificultades técnicas y/o costos asociados a estos procesos.
Consultant	Whatever the implementation deadline, make it absolutely clear that people can use already printed items until they are gone. No more auditors telling CHs they have to throw out hundreds of pamphlets because the logo is "wrong", like the last time there was a logo change.
FSC Member, Environmental North	as soon as possible, with a 12-months' period of transition to allow users to consume or replace stocks of already-printed labels.
Other	I ask to have a long transition period, as the companies need to have a chance to change their procedures/documents and printing systems in a cost effective manner. Additionally, it wouldn't be sustainable to through away already produced products because of an outdated Mix-label. Therefore, I ask for a transition period of at least 24 months.
FSC Network Partner staff	The transition period should ideally be sufficient so as to allow time, where possible, for the label to be updated as part of a company's scheduled artwork update (i.e. as part of a wider re-design). This will likely mean a long transition period but agreeing this at the point of roll-out is preferable to later extensions or special approvals. Clear communication on the transition is vital. We are aware of increasing demand for a Mix label that distinguishes products comprised solely of FSC certified virgin fibre and recycled material (i.e. no Controlled Wood content). Appreciating that this would require other changes to the normative framework, it is perhaps something worth considering.
FSC Member, Economic South	not applicable to us.





Certificate holder	The transition must be slow and very well explained, so as not to be the opposite effect of companies simply decide to remove the FSC seal from their products, or use the mini / reduced seal Changes to the seal can cause impacts for certificate holders: • Economic impact on companies in relation to changes in the seal, due to the need to adapt each printing tool (cliches) - this cost can be diluted if the adaptation period is long, but it can generate impacts on the economic sustainability of the product • Some products have their art registered in official agencies (type ministry of agriculture), which would lead to a need for new approval of this art, which can take a long time, and even if customers request the removal of the seal • Need for the elaboration of new arts, new approvals of these arts with all customers, and making of tools that require time and efforts from different teams • Generation of waste due to printing tool change. The waste has restrictions regarding recycling, and there would be an increase in costs related to this recycling or even disposal of waste, which may impact the sustainability of products • Another point may be the migration to the mini / reduced seal, as it does not have the declaration in its content, or the removal of the seal of the product
Other	Within 12 months from approval. Up to two years could be considered if the recommendations in this submission are incorporated as the aim would be to allow organisations time to make more significant changes to “support FSC”, for example by increasing their FSC percentages before changing labels.
FSC Member, Environmental North	Recent cases of problematic FSC labelled biomass for the market in Denmark have increased the risk of journalists digging into the details of CW and FSC Mixed labeled products - so I urge the FSC to speed up the roll-out as this has been due for several years already!
Certificate holder	as soon as possible
FSC Network Partner staff	This is a large change that would impact nearly every certified company that applies an FSC on-product label. The rollout of the new label text needs to be given careful consideration to minimize the negative impacts to certificate holders. The transition period to the new label text should be as long as possible to ease the transition for certificate holders. Many certificate holders have a large amount of stock and distribute it as needed. The transition period should allow certificate holders to continue to sell this stock until it is gone, as long as they transition to the new label text for new products within the transition period. The transition period should also be long enough to allow those certificate



	holders who purchase finished and labeled products to ensure that they are able to continue to sell any product with the 'old' label text until it is gone. There should also be extra effort put forth to communicate the changes, transition period, and, most importantly, the rationale for these changes. To prevent confusion, FSC should clarify whether Clause 3.3 will be revised, and therefore whether the new mix label text will be required for all products that carry an FSC Mix label. FSC US is not advocating for a change to Clause 3.3 of the trademark standard, but we would like to note that any change to the on-product label text may push certificate holders towards taking advantage of this Clause, and thereby avoid the need for future changes to the label text.
FSC Member, Social North	Within 6 months from approval. A slightly longer period of up to one year COULD be considered if the recommendations in this submission are incorporated but only for those organisations who commit to, and can show that they are making more significant changes to "support FSC", for example by increasing their FSC percentages BEFORE changing labels.
FSC Member, Economic North	Has to be very generous and not force changes leading to losses of viable and functional products and/or materials.
Certificate holder	The transition period must be long enough to allow selling of products labelled with the current logo, at least 24 months. This decreases the cost attached to the change. In practice, a short transition period is not possible.
FSC Member, Economic North	We defend a 12 months transition period.
Certification body/auditor	this statement is more confusing.
FSC Member, Social South	El cambio de etiqueta debe realizarse lo más pronto posible. Ya ha transcurrido un año desde la aprobación de la Estrategia de Madera Controlada, que fue el justificativo para no hacer el cambio antes. Se debe dar únicamente 6 meses como período de transición. Es penoso que este trabajo haya llevado tanto tiempo, y aun no se tenga una propuesta aceptable.
Certificate holder	Please focus on right things who can increase surface or FSC volumes.



Certificate holder	(1) Please consider transitioning requires at least 6 months (especially to adjust automated labelling processes). (2) After transitioning, please also consider a longer period (1 year ??) of both old and new label co-existence in market stocks.
Certificate holder	Our labels are pre-programmed into our accounting software to ensure they are correctly put on our products. This change should come with at least a 6 month transition period to allow us to contract the service to upgrade the programming done in our accounting software. Also, it should be said that this change comes at a price for us. I believe this change is not really changing anything, and instead costing us additional money to update the programming.
Certificate holder	Typically 24 months is plenty of time, 12 months is tighter (minor NCR, one year, etc...) works well. We could change our labels within an annual timeframe.
Certification body/auditor	Please conduct an impact study especially in the offset printing sector. The plates used consist of pure aluminum. For reprints of existing books, brochures etc. two scenarios shall be avoided: 1. The revised FSC Mix label requires to prepare a new plate, solely for a slightly changed FSC label. Waste of resources and energy- 2. The FSC Label is dismissed in the publication and possible later printings from a series. The two mentioned scenarios can only be avoided if at least a very long transition period is granted for justified cases, e.g. five years where the two labels can be run in parallel. Another comment is the upcoming change of the FSC COC standard in relation to a revised trademark license agreement and other intended changes. The revision of the FSC Mix label should not complete the confusion and likely frustration of constant changes within the FSC system in many cases. Thus, carefully agree FSC internally about the timing and sequence of changes to be introduced. Certified companies have other topics than FSC on their desks.
FSC Network Partner staff	2 years transition as a minimum. Many companies are more than one year ahead in the production.
FSC Member, Economic North	appropriate transition time will be needed to allow e.g. printing equipment to be adapted within proportionate timeframes, e.g. 24 months
FSC Member, Economic North	A question : will we have to put this text on all products and packaging or will it just be voluntary add to the logo (which raises the question of the space to do so) ? we will need to have enough time to change our packaging ...



FSC Member, Economic North	<p>- In case the change is considered so essential that it can not be canceled, FSC should consider postponing it to post Covid-19 times. Currently companies are facing severe challenges due to Covid-19 crisis and all changes creating additional work and cost should be minimized.</p> <p>- If the change will be made, the transition period must be long enough to allow selling of products labelled with the current logo, at least 24 months. This decreases the cost attached to the change. In practice, a short transition period is not possible since it takes time to change all logos.</p>
Certificate holder	<p>A día de hoy, muchos de nuestros Clientes ya utilizan la etiqueta FSC MIXTO, en varios productos. Como suele suceder, el comienzo es relativamente fácil porque los Clientes son los primeros interesados... pero los cambios requieren más tiempo y esfuerzo por parte de "las organizaciones certificadas y responsables del uso de la marca", dado que el Cliente NO perderá ningún beneficio de no hacer el cambio hoy... y lo dejará para mañana. CONCLUSIÓN: DAR VARIOS MESES DE MARGEN, PARA EL CAMBIO.</p>
FSC Member, Social South	<p>Ya están retrasados y mientras siga retrasado más se amenaza la credibilidad del sistema. Esa pregunta no debería hacerse, en todo caso aclarase porque tanto retraso.</p>
Certificate holder	<p>Required compliance one year from implementation date</p>
Other	<p>Any change would require a lengthy transition period. It could take up to 2 years to effectively transition all current packaging across to the new on product logo. Additionally, some member would not support the use of this logo. Overall objective page 8: Increase in the success against measurable indicators, including FM certification and FSC 100% sales by 2022. The increase in FSC 100% is not an accurate indicator within most fibre packaging businesses, certainly within Australia where there is considerable focus on the use of reclaimed fibre. Additionally, the requirements of the FM standard, at least within Australia is very onerous. Expecting any real outcomes by 2022 will not be achievable.</p>
FSC Member, Economic South	<p>CW has no status in the sales chain. It serves as a method to include small growers into our value chain.</p>
Certification body/auditor	<p>Transition period must be as usual (one year) but because credit can be maintained for a 2 years period it must maybe be extended to 2 years; must be evaluated.</p>



Certificate holder	Please keep the costs in mind. Unchanged reprints should continue to be permitted with the old design, even after implementation of the new one.
FSC Network Partner staff	I would do it asap, but with all answers ready for all national offices on why we change the wording. And we need to be prepared that we heat up a general debate about FSC MIX. Moreover, I would open the debate to completely remove the percentage system. I think that will allow a much easier and more fair debate about FSC MIX. Within the FSC system many people believe that in FSC MIX you have this minimum requirement of 70% but 30% can be something else (CW). The credit system is much easier to explain, has more FSC input than the percentage system. I really believe that expelling the percentage system can be the easiest solution to many problems we have with FSC MIX especially within the environmental chamber.
Consultant	Please do not ignore the real and substantial cost of this change. The negligible chance of real impact will come at a vast cost to the CH community.
FSC trademark service license holder	Can the old label be used after the new label has been used? Is there a grace period? If the old label is not available, who will pay the change cost?
FSC Member, Economic North	No
FSC Member, Economic South	Creo es importante considerar un período de transición apropiado y diferenciado, al menos de un año para las empresas que hacen uso de etiquetas en sus productos mantienen un stock de etiquetas y material de embalaje con el uso de la marca FSC, por lo que no es fácil ni barato cambiar de un día para otro las etiquetas con el nuevo texto. Propongo que la transición sea de un año o hasta agotar stocks de etiquetas durante el período de un año (lo que sea menor).
Certificate holder	Transition period of 12-18 months is recommended.
Consultant	For plywood industry it is common practice to make a stencil to spray FSC mix label on a side of a pile of plywoods. Making a stencil costs more than 1000 USD. So sufficient timeline must be set for transition from the old text to new text. It is not a good idea to mandate these companies to make new stencils shortly after approval of the next text.



Certificate holder	In case the change cannot be canceled, FSC should consider postponing it to post Covid-19 times. If the change will be made, the transition period must be long enough to allow selling of products labelled with the current logo, at least 24 months. This decreases the cost attached to the change.
FSC Member, Economic North	<ul style="list-style-type: none"> <li>- In case the change is considered so essential that it cannot be cancelled, FSC should consider postponing it to post Covid-19 times. Currently companies are facing severe challenges due to Covid-19 crisis and all changes creating additional work and cost should be minimized.</li> <li>- If the change will be made, the transition period must be long enough to allow selling of products labelled with the current logo, at least 24 months. This decreases the cost attached to the change. In practice, a short transition period is not possible since it takes time to change all logos.</li> </ul>
FSC Network Partner staff	A 1-year transition period seems to be appropriate.
Certificate holder	The transition must be slow and very well explained, so as not to be the opposite effect of companies simply decide to remove the FSC seal from their products, or use the mini / reduced seal
FSC Member, Social South	Mix label should be about 6 months.
Certificate holder	<p>The transition must be slow and very well explained, so as not to be the opposite effect of companies simply decide to remove the FSC seal from their products, or use the mini / reduced seal</p> <p>Changes to the seal can cause impacts for certificate holders:</p> <ul style="list-style-type: none"> <li>· Economic impact on companies in relation to changes in the seal, due to the need to adapt each printing tool (cliches) - this cost can be diluted if the adaptation period is long, but it can generate impacts on the economic sustainability of the product</li> <li>· Some products have their art registered in official agencies (type ministry of agriculture), which would lead to a need for new approval of this art, which can take a long time, and even if customers request the removal of the seal</li> <li>· Need for the elaboration of new arts, new approvals of these arts with all customers, and making of tools that require time and efforts from different teams</li> </ul>



	<ul style="list-style-type: none"> <li>· Generation of waste due to printing tool change. The waste has restrictions regarding recycling, and there would be an increase in costs related to this recycling or even disposal of waste, which may impact the sustainability of products</li> <li>· Another point may be the migration to the mini / reduced seal, as it does not have the declaration in its content, or the removal of the seal of the product</li> </ul> <p>We believe that the impacts will be great in several units, as these changes will be sources of too much economic increase and greater generation of waste</p> <p>We hope that these observations will be considered. From now on we thank the space to weave opinions.</p>
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### 3.3 Controlled wood statements

The proposal included in the public consultation was to allow FSC licence holders to use the FSC name and the FSC initials to promote the sales or sourcing of controlled material or FSC controlled wood. If they opt to do so, licence holders shall only use one of the proposed statements (see page 2 above).

#### Consultation question:

Please provide your comments in relation to the proposed controlled wood statements.

See below stakeholders' comments in relation to the proposed controlled wood statements.

Certification body/auditor	It would be very useful for certificate holders in order to simplify the information on invoices or delivery notes.
FSC Member, Social North	Disagree with this dilution
Consultant	No real issue with any of this. On B2B claims only. No General corporate communications like web sites no B to consumer claims.



FSC Member, Economic North	I agree to this proposal
Consultant	What about making it more explicit that controlled wood is a physical thing and also tied into a process? Our FSC® controlled wood evaluation and designation process mitigates the risk of forest products originating from unacceptable sources. [link to more information about CW] And Our FSC® controlled wood evaluation and designation process mitigates the risk of forest products originating from unacceptable sources. FSC controlled wood requirements prohibit and are designed to avoid: illegally harvested wood, wood harvested in violation of traditional and human rights, wood from forests with threatened high conservation values, wood from forests with genetically modified trees and wood from forests converted to plantations or non-forest uses. For more information on FSC controlled wood see [link to more information about CW]
Consultant	Only allow CW claims in text when promoting products. It's just going to add confusion to consumers if you allow CH's to make these claims on-products and invoices.
Certification body/auditor	We agree with the statements made, since through the controlled wood requirements of standard 40-005, social and environmental requirements are verified up to the forest area. However, most CoC companies produce products that carry the mix label and declare in general and in a promotional way that the inputs are of responsible origin. Thus, it will also be necessary to establish new claims for enterprises that sell mixed products. We also suggest that these statements make it clear that companies can say that they sell controlled wood or not and that they can sell controlled products to non-certified companies.
Consultant	In practice, the wording on how to communicate about FSC Controlled Wood is not decisive. Much more it would be extremely helpful to allow the sale of FSC Controlled Wood to non-certified customers!
Certification body/auditor	The standard must be clear that minor changes of the syntax are allowed as long as the meaning of the statements is not changed.
Consultant	Being able to at least promote Controlled Wood would allow CHs to reap some benefit from all of the effort required to make their respective CW programs work. If the CW "claims" are only for promotional purposes, and not allowed for on-product sales, then the utility of the proposal will be minimal.
Certificate holder	Okay.





FSC Member, Social North	I don't agree as the promotion of controlled wood will not lead to a decrease in its use, on the contrary, the TM recognition would be an incentive.
Certificate holder	I strongly disagree to allow FSC licence holders to use the FSC name and the FSC initials to promote the sales or sourcing of controlled material or FSC controlled wood. Non expert people will not understand the difference between CW and FSC certified. This will have the high risk that this communication is sufficient for companies which will hinder to increase the FSC certified forest area. The proposed sentences will not create a clear understanding of the difference between CW and FSC certified for non experts. Please check this in consumer survey.
Certificate holder	Introduction of the proposed Controlled Wood statements seems to be contrary to the aim of reducing reliance on all forms of controlled wood (including CW-FM). They are, however, a good summary of what Controlled Wood is and we believe they will be effective for promoting the sale and sourcing of Controlled Wood products.
Certification body/auditor	Asociar FSC con las maderas controladas es riesgoso, dado que se tiende a equiparar ambos materiales (FSC y CW); ya se aprecia en las entrevistas a trabajadores, que al ver la sigla FSC inmediatamente asocian que el material está certificado. Sugiero buscar otra forma de declarar CW en la cual no se utilice la sigla FSC al momento de declarar material controlado. Sí me parecen adecuadas los enunciados acompañantes propuestos.
Certificate holder	Change the wording "unacceptable" to for example "controversial". The word unacceptable makes people think that certified companies consciously mix certified material with material from unacceptable sources. The word is too hard. It should be very clear that licence holders can choose between the shorter and longer text.
Consultant	No need to allow companies to advertise controlled wood. This goes in the wrong direction, allowing companies to benefit from being solely CW certified, on the marketing side. Keep CW in the dark basement where it belongs.



<p>FSC Member, Environmental North</p>	<p>change to '...wood from natural forests converted to plantations or non-forest uses' to match Criterion 6.9 in the P&amp;C.' Sequence the phrases to match FSC-STD-40-005: QUOTE - The five FSC controlled wood categories of unacceptable sources (referred to as controlled wood categories) are: 1) Illegally harvested wood; 2) Wood harvested in violation of traditional and human rights; 3) Wood from forests in which high conservation values are threatened by management activities; 4) Wood from [natural] forests being converted to plantations or non-forest use; and 5) Wood from forests in which genetically modified trees are planted. UNQUOTE</p>
<p>FSC Member, Environmental South</p>	<p>I think when communicate controlled wood consumers should be aware of what this means in the context of certified forest, that means, controlled wood communication should be taken in context of the full certified forest management, so consumers will know that is only part of the whole range of benefits that FSC certification can provide. The way the sentences are written lack the context of full forest certification and may lead of an interpretation that CW is marvelous so why be 100% certified?</p>
<p>Other</p>	<p>I support the idea of FSC to allow FSC licence holders to use FSC CW to promote their responsible sourcing. I ask to allow companies to use their own messages, which need to contain defined information. This would increase the companies flexibility and would allow companies to adapt the information more accurate. There should be a minimum requirement which information should be used and what information can't be used. Therefore, FSC should define a frame of possible messages.</p>
<p>FSC Network Partner staff</p>	<p>Given that the Controlled Wood Strategy has a stated aim to reduce reliance and relevance of Controlled Wood it is important that this change does not increase demand for Controlled Wood (with no associated demand for FSC certified material) from those wishing to use FSC Controlled Wood as part of a procurement commitment or lead to claims by uncertified companies in relation to FSC Controlled Wood. We would propose additional text that explains the difference between FSC certified material and FSC Controlled Wood and that there are additional restrictions on FSC Controlled Wood claims.</p>



FSC Member, Economic North	Will there be a system for verifying translations into non-FSC languages, e.g Chinese. Japanese? I note that the second statement is a little confusing since the statement about conversion is different from that in the standard itself since it leaves out the word 'being'. – Wood harvested from areas 'being' converted from forests and other wooded ecosystems to plantations or non-forest uses My understanding is to exclude the 'fruits of conversion from the certified supply chain' not necessarily the fruits of any future plantation management.
FSC Member, Economic South	This condition does not apply for our certificate, as we use the mixed label, so it is indifferent to the new statements.
Certification body/auditor	What would the public understand about "controlled wood"? Not sure what the value proposition is if people will have no idea as to what you are talking about. Even existing certificate holder struggle to really come to grips with CW. Don't think this will make a difference.
FSC Member, Environmental North	In my opinion, the FSC label should not be used to communicate about controlled wood. So I would prefer the current requirement (clause 2.1e, FSC-STD-50-001 V2-0) to be kept.
Certificate holder	This proposal I like! This is a very good idea.
Certificate holder	It will demerit FSC.
Certification body/auditor	Good idea
Other	The current statement is not sufficient. The CW Strategy says: 4.2. Allow FSC-certified organizations to communicate about controlled wood in line with the objectives of this strategy. For the proposed statements to align with the strategy they should have the following: 1) Controlled Wood should not be called FSC Controlled Wood as this undermines the strategy objectives. The inference in the title "FSC CW" is that it is FSC certified and similar to FSC and so leads to fallacious interpretations and advertising. 2) The statements need to ensure far more clarity about the difference between FSC certification and Controlled Wood with a full explanation of what FSC FM certification is (10 Principles, etc) and how CW is different and based on a risk assessment, not direct auditing. 3) If organizations wish to promote their use of CW then they should only be able to do this if they commit to other parts of the strategy such as making public commitments to increase their FSC certified material. 4) At present CW does not mitigate against "conversion". The statement should use the actual CW categories which refer to natural forests "BEING converted". 5) Both buyers and sellers of CW are increasingly using



	CW as a substitute for FSC certified. A strategy to overcome this problem needs to be designed into the statement to overcome this.
FSC Member, Environmental North	Forests of the World does not support this part of the strategy and we are very concerned that this will further undermine incentives to go from CW to FSC FM and FSC pure products. Only if the communication of CW is directly linked to e.g. a five year plan to substantially increase FSC FM uptake and increase in FSC pure products we would consider to support this. Otherwise it must be balanced by other strong initiatives to substantially increase incentives to move away from CW and Mixed products and increase FSC FM and FSC pure products.
Certificate holder	it's a good stepping stone
FSC Network Partner staff	Are certificate holders the only entities that are allowed to use these statements? Do these statements only apply to off-product promotional materials? When communicating any changes to the current requirements, it needs to be clearly stated whether or not certificate holders are able to make invoice claims to non-certified companies. FSC US highly recommends that the second statement be edited to remove 'prohibit' from the second sentence, so that statement would read: "FSC controlled wood requirements are designed to avoid: illegally..." This wording does not align with the current Controlled Wood Standard as the current system is designed to mitigate risk rather than straight avoidance.
FSC Member, Social North	The current statement is not sufficient. There are huge risks in making this change which can lead to continued and increased misunderstanding about Controlled Wood and a decrease in the demand for FSC certified material. The CW Strategy says: 4.2. Allow FSC-certified organizations to communicate about controlled wood IN LINE WITH THE OBJECTIVES OF THIS STRATEGY. For the proposed statements to align with the strategy they should have the following: 1) Controlled Wood should not be called "FSC Controlled Wood" as this undermines the strategy objectives. The inference in the title "FSC CW" is that it is FSC certified and similar to FSC and so leads to untruthful interpretations and advertising. 2) The statements need to ensure far more clarity about the difference between FSC certification and Controlled Wood with a full explanation of what FSC FM certification is (10 Principles, etc – and this should promote our P+C) and how CW is different and based on a risk assessment, not direct auditing. 3) If organizations wish to promote their use of CW then they should only be able to do this with conditions - if they commit to other parts of the strategy such as making public commitments to increase their FSC certified material. 4) At present CW does not mitigate against "conversion". The statement should use the actual



	CW categories which refer to natural forests “BEING converted”. 5) Both buyers and sellers of CW are increasingly using CW as a substitute for FSC certified. A strategy to overcome this problem needs to be designed into the statement as well as the conditions of use to overcome this.
Certificate holder	Agree with the group's proposal.
Certificate holder	De acuerdo con el primer enunciado, considero que el término "mitigar" es la clave para llevar a buen término esta propuesta.
FSC Network Partner staff	I like it, it is truthful and simple.
Certification body/auditor	It should not be allowed to use FSC CW trademarks in relation to FSC Controlled Wood. Again it will weaken the clarity about the message of the FSC trademarks. FSC Controlled Wood remains to be non-certified material and should not be promoted with the FSC trademarks. It will fuel the confusion about FSC for the consumers.
FSC Member, Economic North	fine
Certificate holder	First one is too vague and second one too long. - A new proposal to combine these two: FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. It is designed to secure that no illegal harvesting, violation of traditional and human rights, harvest in forests of high conservation value, use of GM trees nor forests converted to plantations or non-forest uses have taken place to produce this product.
FSC Member, Economic North	We agree with the Technical Working Group’s proposal to allow FSC licence holders to use the FSC name and the FSC initials to promote the sales or sourcing of controlled material or FSC controlled wood. It really make no sense to don’t “reward” or recognize this first approach regarding responsible sourcing, on a possible first step aiming FSC certification. We would like to strengthen that FSC controlled wood is indispensable for the wood-based-panel and the paper industry. For some wood products (like those produced by the wood based panel industry) FSC CW and FSC Mix are completely necessary to be able to supply certified product. FSC should take into consideration that only 48% of the total raw wood consumption by the European wood-based panel industry comes from roundwood. More than half of the woody biomass raw material is recycled or an industrial by-product. Once the consumption of re-



	<p>cycled wood material will increase day after day and the credits are generated with the material of post-consumer, this type of board must be sold as FSC Mix. This is what we call as a circular natural capital approach, sought to reduce the pressure on natural capital by reducing the use of virgin materials. Creating obstacles or increasing the constraints for CW, that goes beyond the need of system credibility and integrity that have already been put in place, won't solve the problems of an insufficient FSC certified area growth. That's why we don't agree or understand with this speech against FSC CW. FSC CW will always have a role in FSC certification and is indispensable for the wood-based-panel and the paper industry.</p>
Certification body/auditor	<p>I do not agree. FSC CW material is not certified and by allowing the suppliers to make claims, FSC is opening the market for more companies to go the CW way (easier option in many countries) and not the full certification.</p>
FSC Member, Social South	<p>La pregunta no está clara; se hace referencia a enunciados, y se dice que los titulares de licencias solo podrán usar “uno de los enunciados siguientes”. No está claro donde empiezan y donde terminan los enunciados, y por tanto si lo que se está comunicando es suficiente y pertinente. La propuesta tampoco responde a los objetivos de la Estrategia de MC. La eliminación de esta restricción constituye un cambio sustancial, y por tanto, deben tomarse medidas adecuadas para evitar confusiones y, a la larga, mantener el uso de MC en los mismos niveles que en la actualidad, o incluso incrementar su uso. A fin de evitar que esto suceda, el enunciado debería informar qué es MC, pero también su diferencia con certificación FSC. El enunciado debe contener el texto de los estándares (textualmente); no se ve la razón para que hayan cambiado, pues incluso la cat 3 no está correcta: “la madera proveniente de bosques con altos valores de conservación amenazados”, mientras que la categoría se refiere a que las actividades de manejo no pueden amenazar los AVC; caso similar, cat 4, que se refiere a conversión, el texto está equivocado; además las categorías se debe enumerar y en el orden que se encuentra en el estándar FSC-STD 40.005. Además, de acuerdo a lo discutido en el proceso de definición de la Estrategia de MC, la eliminación de esta restricción conllevaba también el compromiso de los titulares de licencias de hacer público su compromiso de incrementar periódicamente su material FSC 100%</p>
Consultant	<p>I liked, It's important to have an official options inside the system because usually companies selling just FSC Controlled Wood let the client</p>



	(even non certified) know in some way, even without use the FSC label in the products.
Certificate holder	option 1 ; FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. [link to more information about CW]
Certificate holder	I agree with these changes.
Certificate holder	I'm basically ok with both statements, but like the shorter more. Please consider: (1) "Mitigates the risk" seems to be defensive (or tends to talk itself out of the assurance a consumer would expect to get). (2) "Forest products originating from unacceptable sources" is conceptually not quite fitting (forest products can also be either NTFPs or manufactured forest products = neither of these are necessarily CW)
Certificate holder	I think this is ok.
Certificate holder	These requirements seem reasonable. In this day and age it is hard not to speak about Controlled Wood at some level as we engage customers on Supply Chain assurance. The changes to CW (national risk assessment, mitigation, etc...) has only now beginning to be understood. No one has been audited to the new platform yet. This all comes to pass in 2020. While we see opportunities to move operations presently on transfer to FSC Mix, we are uncertain if this will even work as we are not sure we can work with Controlled Wood as strengthened at present. For example, conversion in WV, how does this reconcile with POA, policy on conversion? Our wood supply in part depends on what would be technically regarded as conversion sources. How conversion plays out with FSC US pilot will help decide if we collapse to boutique status (FSC 100%) with lead times of 4-6 weeks and window dress with FSC (as our volumes will collapse) or if CW is workable, we can continue to source from FSC Certified forests and provide FSC Mix products on next week's shipment.. I frankly think this idea of incentivizing or penalizing folks for FSC Mix systems is perilous. Those who take issue with CW do not have to spend the money to conform. Presently we are conforming with the added expense of \$15K in consulting fees to meet CW objectives in Canada and US. This then leaves less to support market initiatives...in addition to all of the energy the changes required. Remember in most cases, FSC is run by one or two people (at best) in even the larger organizations who have other responsibilities. Work on FSC is an adjunct to regular work. If FSC gets so technical that it requires full-time dedicated staff, then its expense to the firm escalates dramatically.



FSC Member, Environmental North	strongly disagree!!! communication and marketing of CW must stay within the B2B sector! absolutely no support for external (B2C) communication. I miss the options to choose from agree to disagree - because this would have made a quantitative evaluation possible. CW is only a first step towards certification. If you allow B2C communication you weaken the value of certification! you cancel the incentive to go for certification. The wording about CW is very useful, but please restrict the comms. The wording which was developed is good, but should be used to explain CW but NOT for promotion.
Certificate holder	Seems like a good idea.
FSC Member, Economic North	FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. It is designed to secure that no illegal harvesting, violation of traditional and human rights, harvest in forests of high conservation value, use of GM trees nor deforestation have taken place to produce this product.
FSC Member, Economic North	Since Trademark Service license holders doesn't have the ability to buy FSC controlled wood materials (according to the clause 5.6, FSC-STD-40-004 V3-0) and do not have access to the composition of their products through sales and delivery documents, and therefore cannot prove their supply of FSC Controlled Wood, why do we give them the opportunity to promote FSC Controlled Wood materials ?
Other	De acuerdo con lo que se propone
FSC Member, Economic North	First one is too vague and second one too long. - A new proposal to combine these two: FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. It is designed to secure that no illegal harvesting, violation of traditional and human rights, harvest in high conservation value forests, use of genetically modified trees nor conversion of forests to plantations or non-forest uses have taken place to produce this product.
Certificate holder	Nuestra certificación es por "sistema de transferencia", por lo cual, la utilización de la madera controlada no nos corresponde. NOTA IMPORTANTE QUE YA HE MENCIONADO EN OTRAS CONSULTAS Y FOROS: REANALIZAR LA POSIBILIDAD DE UTILIZAR PAPEL CERTIFICADO PEFC, EN TRABAJOS CON CERTIFICACIÓN FSC. * ACTUALMENTE, TANTO PARA TRABAJOS DE ESPAÑA, COMO FRANCIA E INGLATERRA, LA CERTIFICACIÓN DE LOS PRODUCTOS EN COC, SE ESTÁ REALIZANDO MAYORITARIAMENTE CON "PEFC". * SE HA REVERTIDO LA TENDENCIA DEL PASADO. ACTUALMENTE, CADA VEZ SON MÁS LOS CLIENTES QUE SE INTERESAN POR LA





	<p>CETIFICACIÓN PEFC, POR SER MÁS FLEXIBLES Y CONTAR CON MAYOR DISPONIBILIDAD DE PAPEL CERTIFICADO EN EL MERCADO. * DADO QUE ACTUALMENTE, PRÁCTICAMENTE TODO EL PAPEL DISPONIBLE EN EL MERCADO PUEDE LLEVAR CERTIFICADO EN COC... DE ACEPTAR LA UTILIZACIÓN DE PAPEL PEFC... EMPRESAS COMO LA NUESTRA, PODRÍA CERTIFICAR EL 100% DE LOS TRABAJOS CON COC FSC. * ANALIZAR EL BENEFICIO!!!</p>
Consultant	<p>The second statement though longer honestly portrays the extent of control exercised . This would be my preferred option</p>
FSC Member, Social South	<p>No estoy del todo de acuerdo con la eliminación de esta restricción, no estoy en condiciones actualmente de evaluar el riesgo de que se genere una competencia con los propios productos 100 % FSC, en ese caso, no estoy segura del nivel de cumplimiento con los objetivos de la estrategia de CW.</p>
Certificate holder	<p>We like the ability to be able to promote our FSC Controlled Wood sourcing. Thank you for providing us with the mechanism to do so.</p>
Other	<p>Statements reflect what controlled wood proposes to do, however the current statement FSC Controlled Wood (cert no.) is allowed on delivery documentation and invoicing. This does not need to change. Additional wording will potentially increase the volume of paperwork that will support shipments and deliveries.</p>
FSC Member, Environmental North	<p>The precondition of using the proposed statements should be, that the organization has publicly provided solid proof that effective control measures are at place in its timber sourcing chain.</p>
FSC Network Partner staff	<p>I agree. It is good to limit the use of trademark to FSC name and initials only. Using FSC logo for promoting Controlled Wood will be risky.</p>
Certificate holder	<p>In my view both statements are useful to communicate about controlled wood and to make it possible to inform customers that a product at least have a FSC controlled status. For me it is really a step forward that FSC certificate holder can now communicate about that a product have an FSC controlled status and in Forest areas where you cannot get any FSC certified wood it makes very much sense to reward forest companies to perform intensive controlled wood risk assessments</p>
FSC Member, Economic North	<p>I think that the statements below are in line with the current marketplace and only agree that these statements should be enabled as a trade off to changing the current label text. If the label text changes these statements add a true ability to discuss the truth of what controlled wood is.</p>



Certification body/auditor	CW statement is important but I see the CW material as the "bastard son", the son that nobody want to mention but everybody know that it exists, and the worst is that we need it. I do not disagree with CW but most of the companies find a refuge and a way to have certified material at lower price. With the CW, the intention was to increase the certified material availability but to pas this material to FSC 100%, and now most of big companies prefer to maintain them provider in FSC CW for being cheaper and lower responsibilities than FSC 100%.
Certificate holder	It would be helpful to allow the sale of FSC Controlled Wood to non certified customers.
FSC Member, Social South	No Comment
FSC Network Partner staff	I think this is not a good idea. This will make the communication and explanation of FSC and the different types of FSC labels only more complicated. Especially the effect on companies (f.e. IKEA) that want to source 100% FSC Material in 2025 or so are negatively effected by allowing these statements. I will lower the bar for traders, forest owners that do not want to participate in FSC but are forced due to these type of retailers will use the opportunity we give them by allowing these type of statements. I think the risks that this will be used against us (media, other forest certifications schemes, politicians) by far exceed the benefits (allowing a company to promote FSC CW)
FSC Member, Economic North	Strongly Disagree to change the current requirements. We do not support any communication on FSC CW beyond b2b. I miss the option to choose if i agree or disagree
Other	Seem logical.
Other	"Controlled wood" idea makes FSC mark incredible For restoring trust in FSC, the "controlled wood" idea must be abandoned and the certificate must work as Yes/No, i.e. no admixture of non-certified wood may be allowed in certified products
Certificate holder	These statements make it sound like all non-FSC certified sources come from unacceptable sources. That is not the case. FSC controlled wood verifies that forest products do not originate from unacceptable sources and mitigates any risk of that occurring.
Consultant	The statements are reasonable. I remain doubtful that this sort of communication will ever improve understanding of such a complex topic.



FSC Member, Economic North	No
FSC Member, Economic South	No tengo comentarios, me parece que los enunciados de madera controlada que se proponen son adecuados
Certification body/auditor	The statements are clear. Minor changes should be controlled by FSC and attention should be paid to translations. SThi sis also true for the official FSC languages as recently reading FSC STD 40 006 in EN and ES certain requirements seem different in both languages
Certificate holder	I support the shorter statement. The longer statement has contradictions as the meanings of 'prohibit' and 'designed to avoid' apply to specific risk elements. This detail is better explained in extra text found via link.
FSC Network Partner staff	It is assumed that there is little interest and willingness on the part of CHs in communicating and making statements about Controlled Wood, because this would in a certain way "lose value" to the product which will be declared as something not certified (we think especially in a MIX CREDIT) and often the company has no alternative but to use the controlled, even if in reality it may want to use an FSC-certified input. Finally, if the goal is to increase the supply of FSC 100% perhaps starting to talk about the CW is not a good strategy...
Certificate holder	Is there a label associated with it? Without a label statement adds little value, we can already make a statement that it is CW and give them the definition. Would this apply for sales to non-certificate holders in the supply chain? That would add value.
FSC International staff	I support the first statement. The second statement is not truthful, as CW is NOT designed to AVOID or PROHIBIT unacceptable material. As such these 2 phrases should not be incorporated and they contradict the statement on mitigation (which is the true one). PS: I'm happy to be personally contacted by consultation organizer, if needed.
FSC Network Partner staff	I think it is good idea to promote the sales of CW product and giving correct information to the consumers.
Certificate holder	I agree, both with the opening of the perimeter for the FSC licence holders so that they can communicate on Controlled Wood, and with the wording proposed.
Consultant	I would like to see more of simple statements such as: FSC Controlled Wood mitigates the risk of forest products originating from unacceptable



	sources such as illegally harvested wood. For more information on FSC controlled wood see [link to more information about CW]
Certificate holder	The first one is too vague and the second one too long. - A new proposal to combine these two could be as follows: "FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. It is designed to secure that no illegal harvesting, violation of traditional and human rights, harvest in high conservation value forests, use of genetically modified trees nor conversion of forests to plantations or non-forest uses have taken place to produce this product."
FSC Member, Environmental North	I strongly disagree with this proposal. The marketing of CW should not reach the same level as marketing for FSC 100% and FSC Mix. The consumers should always have the inducement to prefer FSC 100% and FSC Mix over CW.
FSC Member, Economic North	First one is too vague and second one too long. - A new proposal to combine these two: FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. It is designed to secure that no illegal harvesting, violation of traditional and human rights, harvest in high conservation value forests, use of genetically modified trees nor conversion of forests to plantations or non-forest uses have taken place to produce this product.
FSC Network Partner staff	The proposed controlled wood statements are accurate and precise. However, the proposed statements should only be used by FSC certificate holders (and not to every FSC license holder). Trademark Service license holders doesn't have the ability to buy FSC controlled wood materials (according to the clause 5.6, FSC-STD-40-004 V3-0), and therefore shouldn't be able to promote controlled wood materials. According to the current FSC standards, the composition of the product (in terms of FSC 100%, reclaimed materials and/or FSC Controlled Wood) cannot be determined for FSC Mix products, based on sale documents. Trademark Service license holders does not have access to the composition of their products through sales and delivery documents. Since TSL holders cannot easily prove their FSC Controlled Wood procurement, they should not be able to communicate about FSC CW.
FSC Member, Environmental North	No further comments.
Certification body/auditor	Agree



## 4. Analysis of stakeholder comments

### FSC MIX label text

Of all respondents 36% agreed, 31% disagreed, and 33% were either neutral or did not respond. The number of respondents per chamber is low and the answers show mixed views. Among environmental chamber respondents there is a majority agreeing to the fact that the new text of the MIX label reinforces truth in labelling. Economic chamber respondents are evenly spread in agreeing and disagreeing. From the explanatory comments (see section 3.1 above) a recurring theme among economic chamber members (and other private sector respondents), who did not agree with the statement, is that they do not see the need to change the MIX label text at all. As the approved CW strategy requires a change to the text, such recommendations could not be considered at this stage. The lower number of responses came from social chamber members (8), of which 5 disagreed and 2 agreed that the new text reinforces truth in labelling.

### Implementation of the new MIX label text

Stakeholders expressed the need for long implementation timelines considering the costs involved and the amount of products displaying the MIX label. Furthermore, the wish was expressed that both the current and the new label should be available during that period. Respondents also expressed the need for clear guidance and communication about the change.

### The proposed Controlled Wood statements

On the one hand, a number of stakeholders seemed to disagree with allowing any statement about controlled wood. On the other hand, the aim of the consultation was not to ask stakeholders if they AGREE/DISAGREE with the introduction of the controlled wood statements. Allowing some form of claim about controlled wood had been previously agreed by the stakeholders involved in the [controlled wood strategy](#) and approved by the Board of Directors. Therefore, these recommendations could not be taken into consideration and the Technical Working Group only considered the other comments for the final proposal.

## 5. Decision by FSC International's Board of Directors

Based on the consultation results, the Technical Working Group decided not to change the proposed MIX label text and controlled wood statements, and developed an implementation plan which considered stakeholder views. The BoD decided to accept the proposal.

### Excerpt from the “Decision Record of the 84<sup>th</sup> meeting of the FSC Board of Directors”:

Decision on the FSC MIX label text:



*The current label text (“[product type] from responsible sources”) will be replaced with the following new label text: “[product type] | Supporting responsible forestry.” The new label will be launched in January 2022 and be fully implemented on 1<sup>st</sup> July 2025 after a longer than usual transition period to enable certificate holders to implement the change.*

*The decision was made by board vote with 11 members voting in favour of the new label text and one member voting against.*

*Decision on controlled wood fixed statements:*

*The board also decided to follow the recommendations of the Technical Working Group and the PSC to introduce fixed statements that FSC licence holders can use to communicate their sourcing or sales of controlled material or FSC controlled wood.*

*Off-product, these statements can be used together with the FSC name and the FSC initials (not with the logo). On-product, the statements shall be used only in addition to the FSC MIX label and in addition to a description of the FSC MIX label such as those presented in Annex C of the trademark standard (FSC-STD-50-001).*

*The board approved the following fixed controlled wood statements:*

- FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. [link to more information about controlled wood and mixing]*
- FSC® controlled wood mitigates the risk of forest products originating from unacceptable sources. FSC controlled wood requirements prohibit and are designed to avoid illegally harvested wood, wood harvested in violation of traditional and human rights, wood from forests with threatened high conservation values, wood from forests with genetically modified trees and wood from forests converted to plantations or non-forest uses. For more information on FSC controlled wood see [link to more information about controlled wood and mixing]*

*The decision was made by board vote with 11 members voting in favour of the new label text and one member voting against.*

Last updated in November 2020