



Forest Stewardship Council®

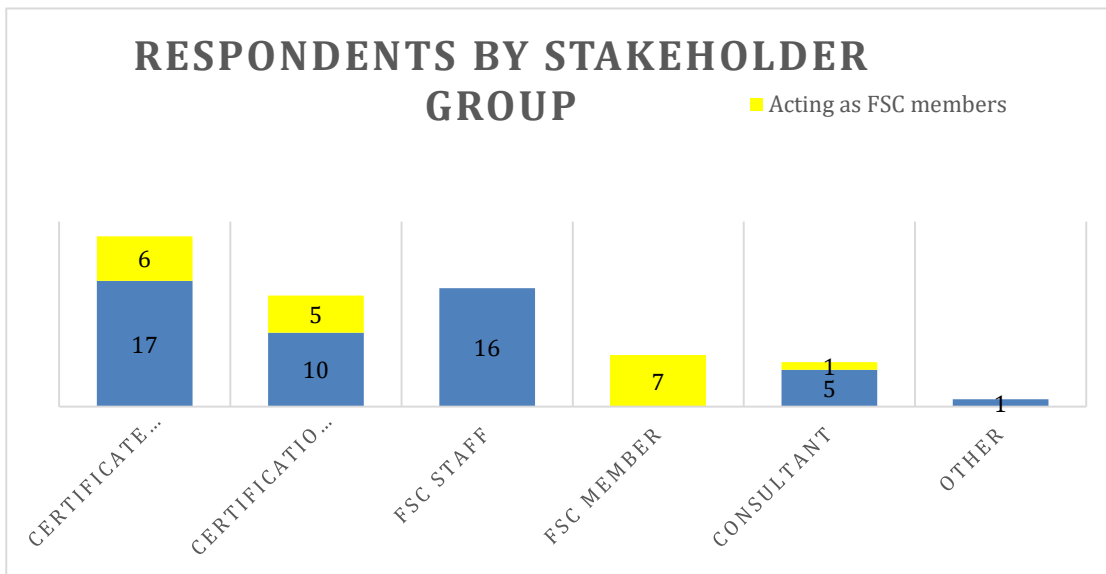


# Report of the second public consultation of requirements for FSC® trademark use by certificate holders

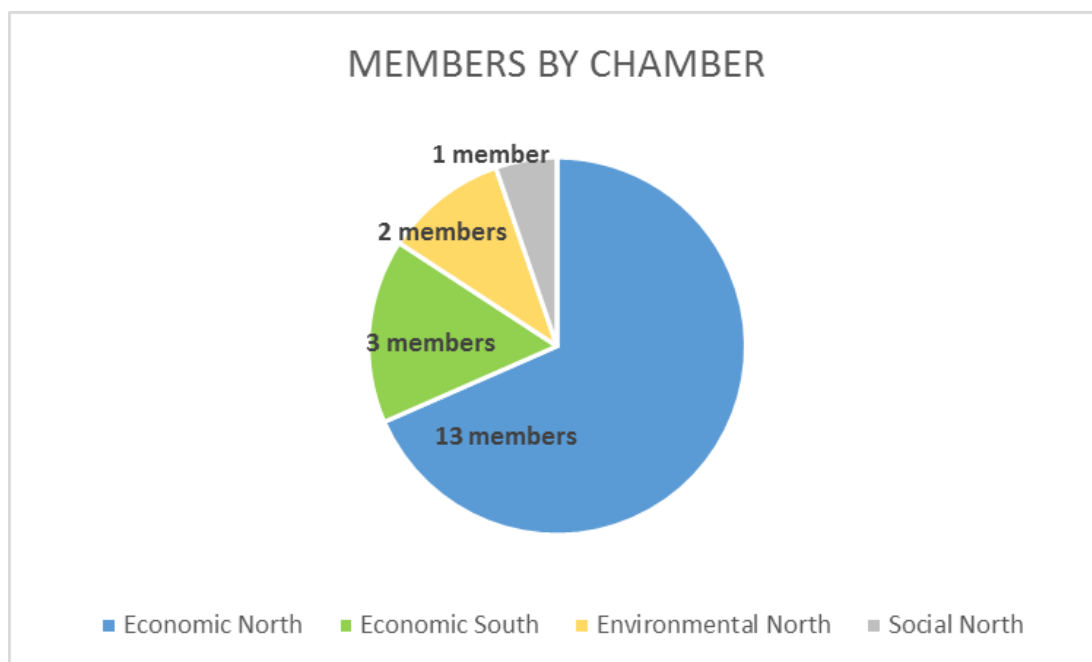
(FSC-STD-50-001 V2-0 D2)

FSC-STD-50-001 defines the requirements of FSC trademark use by certificate holders. The second draft of the revised standard was open to public consultation between 1 March and 30 April 2017. This report presents a summary of the key stakeholder feedback received during this consultation.

68 stakeholders submitted altogether 687 comments on the draft standard. Figures 1 and 2 provide a breakdown of these respondents, by stakeholder group and by FSC chamber. Of the 26 countries represented in the consultation, the largest number of respondents came from the USA, Germany, Japan, Italy, Brazil, and the UK.



**Figure 1. Consultation participants by stakeholder group**



**Figure 2. Consultation participants by FSC chamber**

[Table A](#) presents the responses to the questions posed during the consultation. [Table B](#) presents the individual comments received, by section and clause. For confidentiality reasons, the names of respondents have been omitted from this report. Some comments appear more than once, because identical comments were sent by more than one stakeholder.

All the comments were analysed and considered by FSC, while respecting technical feasibility and alignment with FSC’s mission and strategic planning. A summary of the key topics identified in the consultation follows.

## Summary of the key topics identified

### 1. FSC Mix label text

The second draft of the standard suggested not to change the text for the FSC Mix label, based on comments received on the discussion paper published with the draft, consumer research conducted between consultations, and a cost assessment. During this consultation, only a few comments were made relating to this suggestion. However, after the consultation closed, 49 environmental and social chamber members signed a letter to FSC expressing their concerns about the suggested direction.

After reflecting on the level of stakeholder concern about not changing the label, and on the stakeholder objections to changing the label received during the first consultation, FSC decided to separate the question of the FSC Mix label text from the process of revising these requirements. Additional stakeholder discussions will be arranged to find a solution, and the decision will only be taken once the controlled wood strategy has been approved.

## **2. Labelling elements**

In the second draft standard, it was suggested that FSC requires minimum elements for on-product labelling only, and that users can choose additional elements for the label based on their needs – with the user responsible for ensuring compliance with national labelling requirements and laws. This will change the current requirement for labelling with the full elements, unless the clearly stipulated special conditions related to the size of the product or space available prevent that.

The stakeholders agreed with this approach during the consultation. It was seen as efficient and simple, as well as creating more flexibility. Some concerns were expressed in terms of the increased likelihood of mistakes and the loss of uniformity.

Based on these comments, the suggested route – more flexibility and choice in return for more responsibility at the national level – was maintained for the final standard.

## **3. Trademark use management system**

The second draft standard for FSC trademark use presented the concept of a trademark use management system. According to this system, a certificate holder with a good track record may opt to take control of their own FSC trademark use by setting up an internal trademark use management system, instead of acquiring approval from a certification body for each use. This concept was well received, overall. It was seen as a way to ease and increase labelling and promotion with FSC trademarks.

Some concerns were voiced regarding the complexity of the required system, and about the increased likelihood of cases of FSC trademarks being misused, which are difficult and costly to amend. Several comments requested more calibration for assessing what constitutes a 'good track record'.

The trademark use management system was included in the final standard, with some clarifications on the wording and structure of the Annex for ease of use. No prescriptive calibration, such as a fixed number of approval requests, was included. This will enable certificate holders and certification bodies to work together to agree on the conditions applicable, depending on the size and complexity of the organization.

## **4. Promotional elements**

The stakeholder comments revealed a need to restructure this section of the standard, and provide illustrations on compulsory and optional elements when promoting FSC-certified products or FSC certification. The section was reorganized, the titles clarified, and new illustrations provided to make this section easier to use.

## **5. Product type specification**

A new clause was added to the standard, concerning the product type specification on products containing neutral materials that cannot be distinguished from FSC-certified materials. This was based on a decision by the FSC board. This clause created follow-up questions. Consequently, the language was simplified and the example made simpler to make this clause easier to implement.

## **6. Label and logo size**

The draft standard suggested a radical reduction of the minimum size requirements for FSC on-product label and logo use. The minimum size requirement, without any special conditions, is 25% of that outlined in version 1-2 of the standard.

The comments mainly welcomed the increased flexibility and fewer special situation assessments compared to version 1-2 of the standard. However, some concerns were expressed regarding a loss of FSC visibility per product, and for relying on legibility as the main criteria.

The overall reductions in minimum sizes were introduced to the revised standard in order to facilitate the flexible use of the FSC trademarks.

## **7. Use of the <sup>TM</sup> symbol with FSC trademarks**

The use of the trademark symbol <sup>TM</sup> alongside the FSC trademarks, in countries where the FSC trademarks are not yet registered, was changed into a recommendation rather than a requirement in the revised standard. There were several questions about the reasons for this change in the stakeholder comments. The shift was based on a reassessment of FSC's trademark protection strategy, as registration has proceeded to cover high number of countries globally. For the same reason, the list of registrations has been removed from the standard, although it is available for users online in the trademark portal and online marketing toolkit.

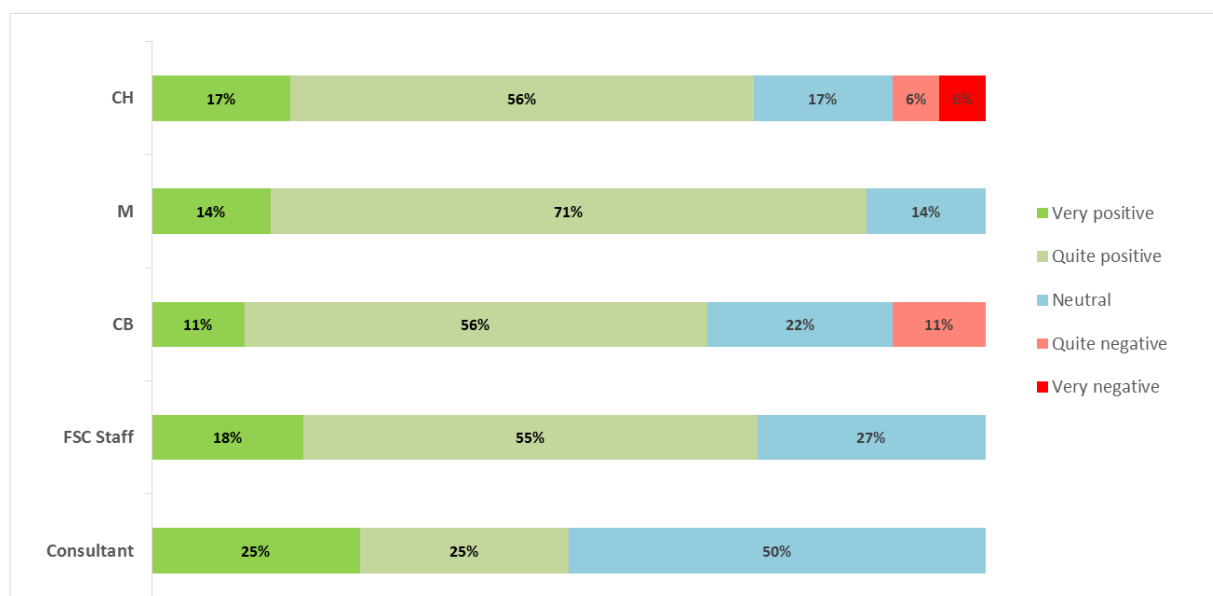
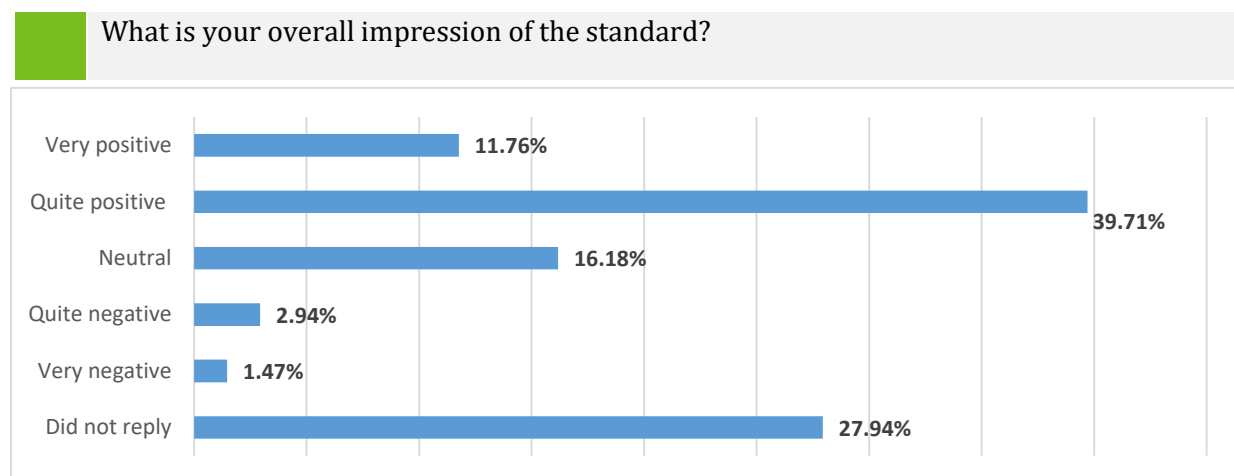
## **8. Examples of describing FSC certification and FSC-certified products**

A new annex was introduced to the revised standard, providing examples of how to describe FSC certification and FSC-certified products by each claim type. The annex was well received as a helpful tool for certificate holders, and has been included in the final standard.

## Table A: Results of the consultation questions

The following abbreviations will be used in this report.

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



Respondents to this consultation question: 49 (out of 68 stakeholders in total)

### *Additional comments related to this consultation question:*

M, Social North	I agree with the direction being taken. Additional steps should be taken to ensure increased use of the trademarks. We must amend the draft to signal to CB reviewers and ASI that it is acceptable to approve trademark use using common sense when the "intent of the rule is met" vs the "letter of the law."
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CB	Some additional clarifications (as mentioned in the comments) would be useful.
CB	I still think the standard is too long and too hard for a certificate holder to follow. We struggle with it even though we use it every day for our trademark approvals.
FSC Staff	Social media trademark use must be addressed. This is an area with a huge potential for promotion and also an area where there is potential for inconsistent interpretation.
CB	The standard proposes itself to be simpler than before, and it's great. This standard can be an important tool for CH to improve the FSC label's usage. But still has improvement to do and some important conceptions are missing, such as Forsters, communities and loggers needs. Imaflora will send by email our proposal for this standard. Congratulations for the FSC efforts to simplify the rules and also maintain the robust system.
CB, Economic North	Glad to see that, based on an independent study on the understanding of the labels and impact assessment of changing the labels, this draft is proposing to not change the claim language on the labels.
FSC staff	Many comments already provided - especially on the need to expand introductory sections
M, Economic North	The items removed from the standard and the changes are in line with the global strategy for FSC and other items.
CH	Very good work to simplify the use of your brand. Need to be continued in better listen your customer - stakeholder
FSC Staff	Generally like the changes to the requirements but feel the format needs improving and some clauses need further clarification/alignment.
Consultant	While I am happy with a few revisions, I do not feel that the standard is making it easier for printing companies specifically. Many customers, as you are aware, opt not to use the label because the requirements are extremely strict. I had hoped for more leniency.
M, Economic North	In general the new standard version is a step to right direction with its attempts to simplify rules and procedures thus aiming at more workable system.
CH, Economic North	Draft 2 is a much better document than Draft 1
CH, Economic North	In general the new standard version is a step to right direction with its attempts to simplify rules and procedures thus aiming at more workable system.
M, Economic North	In general the new standard version is a step to right direction with its attempts to simplify rules and procedures thus aiming at more workable system.
CB, M, Economic North	Some good improvements had been made (thank you!), but overall, it's still very long, hard to memorize with several does and don'ts.
CH, M, Economic North	The draft standard makes it slightly easier to use the FSC Trademarks but still has more potential to reduce bureaucratic burdens. There are inconsistencies with the forest for all.... Label use requirements.
Consultant	Throughout the document, terms "Trademark management system" and "Trademark use management system" are both used. According to T&D, the former term is the defined term. So latter term should all be changed to the former term. National Offices should have an access to the trademark portal. CHs sometimes asks about the registration status of certain trademarks in

	certain countries. Now National offices do not have access to the latest status at all.
M, Environmental North	A large number of environmental and social chamber members believe that the FSC Mix label text -- "From Responsible Sources" -- is deceptive and needs to change. The wording should be accurate and should be evaluated possible against the tests in the U.S. Federal Trade Commission's (FTC) green guidelines (See <a href="https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-issues-revised-green-guides/greenguides.pdf">https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-issues-revised-green-guides/greenguides.pdf</a> ) as well as edition 12 of the CAP Code (UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing. CAP is the Committee of Advertising Practice, the self-regulatory body that creates, revises and enforces the Code (see <a href="https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html">https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html</a> ).
FSC Staff	Despite of the several improvements, my opinion is neutral because I believe that most of the requirements were not changed, but rephrased for an improved understanding. And because I am not sure if I understood the proposal regarding the use of the label elements. That is a critical element of the standard that would bring significant changes, so I am not able to come to conclusion about the overall impression of the standard.
CH	I am not clear on use of FSC text in our invoices to customers and can't see where in the standard it specifies it. Does the FSC wording need TM after in in the invoices? Our CB said it doesn't, when for many years we have used TM.
CH	It is a streamlined standard with less restrictions regarding size and placement. It will be easier to manage FSC trademark usages.
FSC Staff	Some remarks we got: - Changes in the (trademark) standard should (shall) not lead to additional costs (efforts) for CH's - Some were surprised that the one label option did not come back in this version of the standard. Amongst some CH's there remains a clear wish to have one FSC-label (so one label instead of FSC 100%, FSC Mix and FSC recycled) - Still far too much bureaucracy around promotional use of trademark
CH, Economic North	No major surprises, no major opportunities...
M, Environmental North	Members of the environmental chamber are disappointed by FSC's decision not to revise the text of the FSC Mix label from the current "From Responsible Sources" to wording that accurately reflects the underlying realities of the Mix system. An additional letter and comments to this effect are being submitted by a group of environmental and social chamber members, including WWF Germany. In addition to WWF Germany, we as informed by the broader WWF network also stand behind transparency as a principle of responsible markets and eco-labels, and support the intent of this aforementioned letter. We suggest FSC thoughtfully consider the needs for truthful and accurate communications between businesses and with consumers, and to reconsider a Mix label that resonates with consumers while more closely reflecting the realities of controlled wood.
CH	Please do not make any more changes. FSC is a too much waste of time already. Tons of work for no profit.
	Are there any proposed changes in this draft of the trademark standard that you like?



CB	It's good that trademark use is now allowed on business cards again.
M, Social North	Yes, please see my section by section comments.
CB	Including the FFAF within one document is good.
M, Economic South	The flexibilization of requirements concerning to the size of the label was great! In addition, the trademark use management system is an important step, but the respective annex needs to be improved in terms of clarity.
CB	Annex A.
FSC staff	FSC US is supportive of the addition of labeling agreements with non-certified trademark license holders.
CB	Yes, we'll send by email.
CH	As previously explained.
FSC staff	Many comments already provided - especially on the need to expand introductory sections
M, Economic North	The ability for brand owners to get a license so that their brands can have one branded item of packaging made by several certified companies is a very important step the right direction as this will allow FSC to grow more easily in new markets and with packaging that is an important product sector in the future.
FSC Staff	Trademark management system
CB, Economic North	Allowing text promotion on business cards
M, Economic North	Metsä Group welcomes the following changes: - changes in labelling arrangements between organizations i.e. 1) no need for both organizations to keep data relating to the use of buyer's labels but only keep the contract available and 2) the product may carry the branding of a retailer or brand owner that does not need to be certified - the increased flexibility on size and formats of the label - improvements to trademark management and control systems that increase organization's opportunities to control its FSC trademark use
CH, Economic North	UPM welcomes the following changes: - changes in labelling arrangements between organizations i.e. 1) no need for both organizations to keep data relating to the use of buyer's labels but only keep the contract available and 2) the product may carry the branding of a retailer or brand owner that does not need to be certified - the increased flexibility on size and formats of the label - improvements to trademark management and control systems that increase organization's opportunities to control its FSC trademark use
M, Economic North	FFIF welcomes the following changes: - changes in labelling arrangements between organizations i.e. 1) no need for both organizations to keep data relating to the use of buyer's labels but only keep the contract available and 2) the product may carry the branding of a retailer or brand owner that does not need to be certified - the increased flexibility on size and formats of the label - improvements to trademark management and control systems that increase organization's opportunities to control its FSC trademark use
CH	The size of the label is reduced.
CH, Economic South	The flexibilization of requirements concerning to the size of the label was great! In addition, the trademark use management system is an important step, but the respective annex needs to be improved in terms of clarity.
Consultant	Allowing greater flexibility in general. Reducing restrictions. Allowing CHs to manage trademark approval themselves.

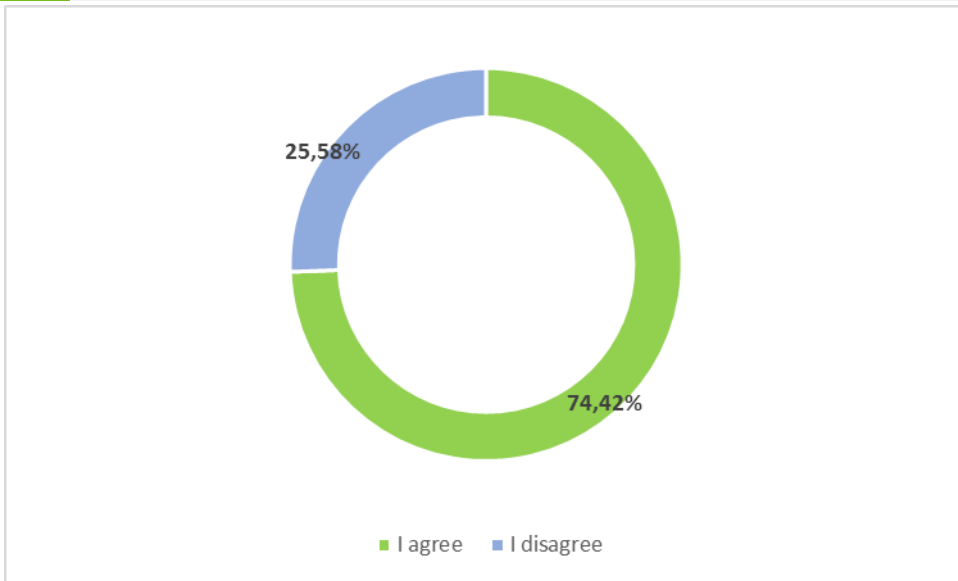
M, Environmental North	A large number of environmental and social chamber members believe that the FSC Mix label text -- "From Responsible Sources" -- is deceptive and needs to change. The wording should be accurate and should be evaluated possible against the tests in the U.S. Federal Trade Commission's (FTC) green guidelines (See <a href="https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-issues-revised-green-guides/greenguides.pdf">https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-issues-revised-green-guides/greenguides.pdf</a> ) as well as edition 12 of the CAP Code (UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing. CAP is the Committee of Advertising Practice, the self-regulatory body that creates, revises and enforces the Code (see <a href="https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html">https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html</a> ).
Consultant, Economic North	I like the new On-Product-Label standard which enables a more flexible usage independent of size of product or printed document. Positive is that the trademark Fores for all Forever can be combined with current trademarks. It will be very helpful if this Trademark is part of the Label Generator, too.
FSC Staff	The self-approval for trademark use option.
CH	We are glad to see that a decision was taken to leave the FSC Mix labels unchanged.
FSC Staff	Yes, the new trademark use options (really hoping to see point 4.2 and 8.8 comments integrated!) + self approval system.
CH	Only having 1 label - clears up trying to work out which one to use and which size you can fit which elements in. Taking out a lot of wording, makes it easier to quicker to read. Examples are good. Examples at end for wording on talking about FSC were excellent, I hadn't seen these before.
CH	Trademark use management system
CH	No
CH, Economic North	Increased flexibility for users to use the label in different contexts.
FSC Staff	Yes, I like - organization can do self-approval of the label use, as long as they have system in place - example given on how to explain FSC and FSC certified product to public.
CH	No!

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

M, Social North	Yes, please see my section by section comments.
CB	I do not like the recommended options. This is too subjective.
CB	None
M, Economic North	No!
CH	Don't open the Pandora box with the proposal of license code on product for noncertified company
FSC Staff	Although not for this standard, we have strong concerns regarding the proposal to allow the license codes of non-certified companies to be used within on-product labels. Also concerned that the new minimum sizes may be too small (for legibility)
M, Economic North	Metsö Group strongly opposes the categorical prohibition to use FSC trademark in product brand names, company names or website domain

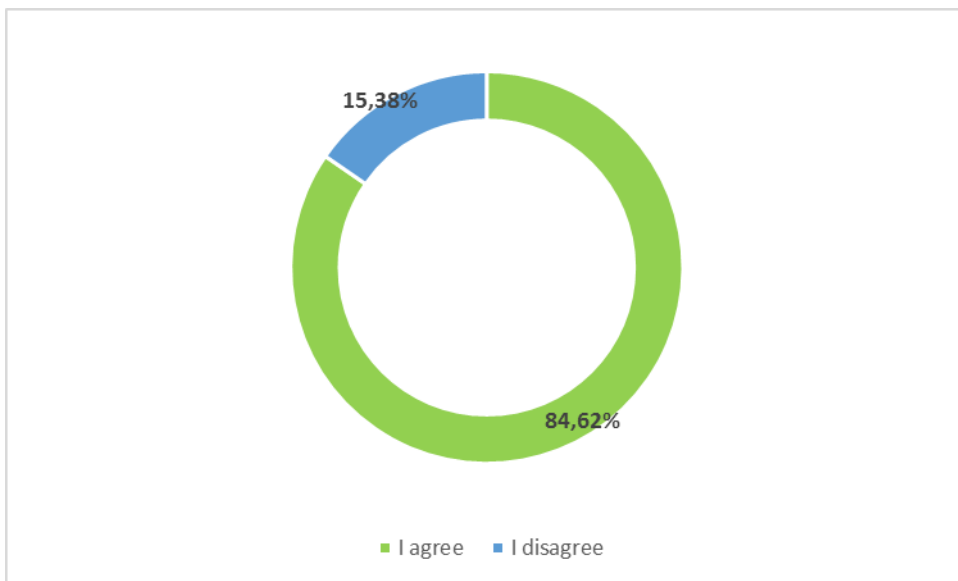
	names. Metsä Group also calls for clarification for specifying product type when FSC-certified products contain neutral materials that cannot be distinguished from FSC-certified ingredients. The requirement should be limited to fibre only so that other ingredients needed in paper making process (such as materials to increase paper's strength) would not prohibit paper makers to label their products as FSC paper.
CH, Economic North	UPM strongly opposes the categorical prohibition to use FSC trademark in product brand names, company names or website domain names. UPM also calls for clarification for specifying product type when FSC-certified products contain neutral materials that cannot be distinguished from FSC-certified ingredients. The requirement should be limited to fibre only so that other ingredients needed in paper making process (such as materials to increase paper's strength) would not prohibit paper makers to label their products as FSC paper.
M, Economic North	FFIF strongly opposes the categorical prohibition to use FSC trademark in product brand names, company names or website domain names. FFIF also calls for clarification for specifying product type when FSC-certified products contain neutral materials that cannot be distinguished from FSC-certified ingredients. The requirement should be limited to fibre only so that other ingredients needed in paper making process (such as materials to increase paper's strength) would not prohibit paper makers to label their products as FSC paper.
CH	Optional elements in the label will increase the administrative burdens and increase the risk of incorrect labelling.
Consultant	Rules regarding the use of newly introduced Forests for All Forever trademarks are not very well presented. Removal of a well-established term (concept) of mini-label may confuse a lot of CHs.
Consultant, Economic North	Trademark use management system (reasoning see above)
FSC Staff	It was not clear for me the proposal regarding the use of the label elements. And I do not like the option that companies can make promotional use of the trademarks on invoices. There are many places where they can make promotion like websites, catalogues, etc., but for credibility reasons, we should not allow promotion on the same place where FSC claims are made. If non-FSC products are sold in an invoice that contains the FSC logo, I doubt that buyers would pay attention reading the disclaimer in small letters under the label.
FSC Staff	Yes, the option of agreement for the labelling of products between a CH and a NCH
CH	No
CH	No
CH, Economic North	Could have provided more flexibility in terms of smaller sizes, and also improved how the brand mark can be used. Also, since ANNEX 1 with trademark symbols is removed there would need to be some system on how to communicate changes to certificate holders.
CH	All

The revised standard is easier to understand than the existing standard



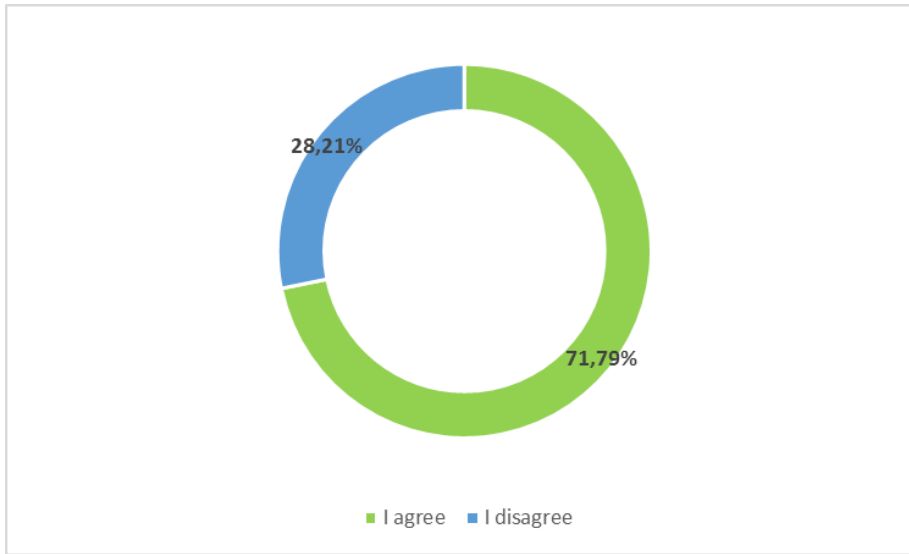
Respondents to this consultation question: 43 (out of 68 stakeholders in total)

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



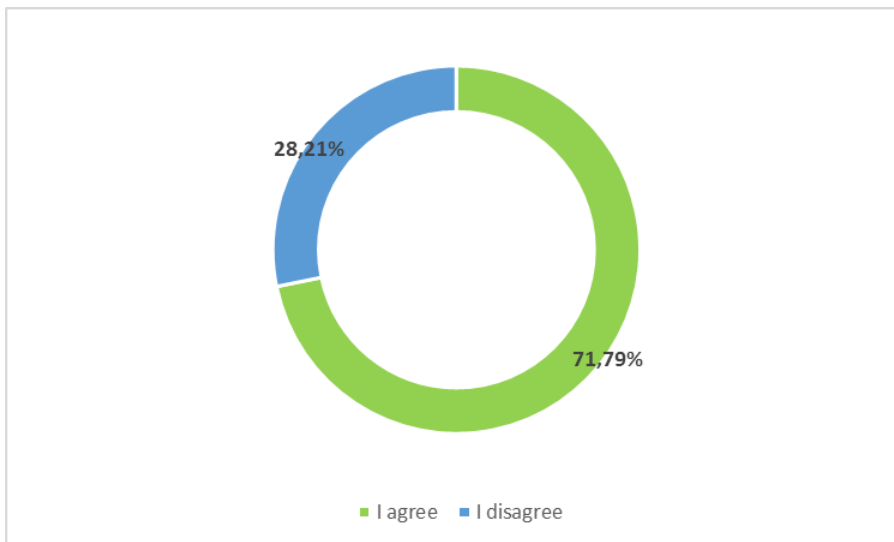
Respondents to this consultation question: 39 (out of 68 stakeholders in total)

The requirements will make it easier to label FSC-certified materials



Respondents to this consultation question: 39 (out of 68 stakeholders in total)

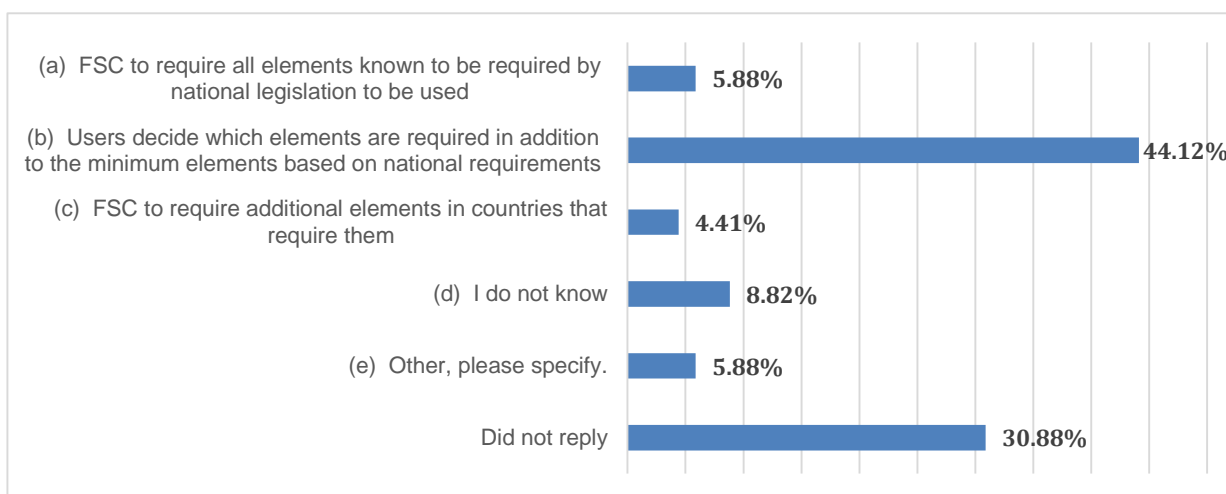
The requirements will make it easier to promote FSC and FSC-certified products



Respondents to this consultation question: 39 (out of 68 stakeholders in total)

Removing the requirement to use all of the label elements might lead to a situation where local labelling requirements of a country are not always met. At the moment, we are aware that not providing a link for further information on the certification mark might not be in compliance with some countries' legislations. In your opinion, how would you prefer FSC to deal with this:

- (a) FSC to require all elements known to be required by national legislation to be used (this would require labelling with full elements, a change to the current mini-label or adding text next to it)
- (b) Users decide which elements are required in addition to the minimum elements based on national requirements (this option is presented in this draft version)
- (c) FSC to require additional elements in countries that require them
- (d) I do not know
- (e) Other, please specify.



*Specifications on answer (e):*

FSC Staff	Guidance on how national labeling requirement relate to FSC labels should be provided by FSC and available through the trademark portal, similar to how the trademark registration information is available.
Consultant, Economic North	Option (b) combined with information by FSC i.e. as an annex to the Trademark Standard in which national legal specific requirements are listed. It is important to list all special national requirements for those CH which distribute to other than only national market in order to safeguard correct FSC Labelling in Export markets, too.
FSC Staff	Amongst those that responded there is clear preference for uniformity of the rules with the smallest chance for mistakes and the least administrative burden. In fact this means that all elements should be obligatory for all countries.

*Additional comments on this consultation question:*

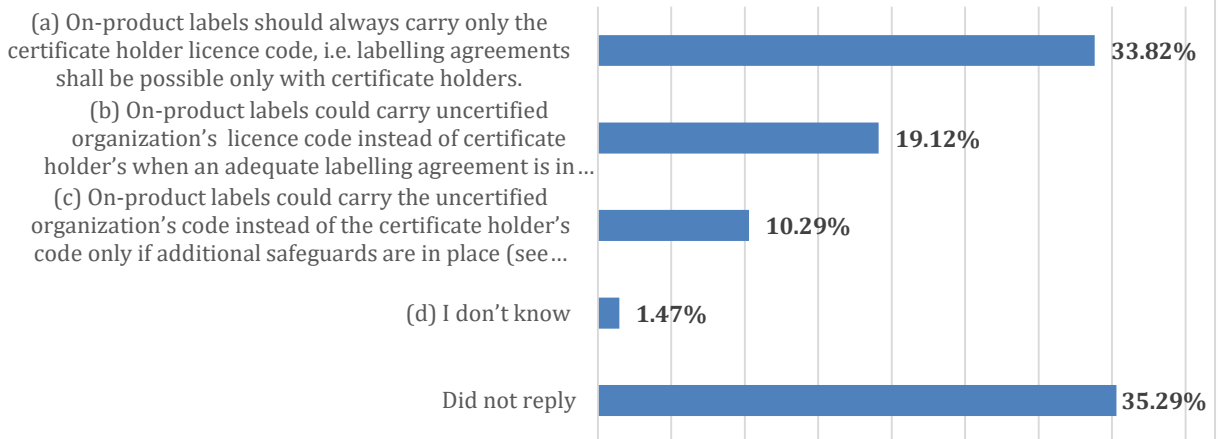
M, Social North	FSC is not a standard that dictates how someone shows conformance. We need to leave it up to companies to follow the rules of the markets they are in.
FSC Staff	3.5 see options selection and further info for answer. In addition to b) we would suggest giving all the help and guidance possible here to assist certificate holders. Although the decision must reside with them, FSC could at least provide an Annex (which would need updating but could have a

	disclaimer to alert CH to verify status in their country). Advice given here could be similar in tone to that of previous EUTR advice notes in FSC-DIR-40-004 in explaining to CH how their use must also comply with legality etc.
CB	It would have to be clear which data ASI would use to audit CB approvals if this option is used.
M, Economic South	The option B is efficient and simple both to FSC and to CHs. Clause 3.5 ensures CHs are complying with national labelling requirements.
FSC Staff	Note for stakeholders Option (b), that results in Clause 3.5, is fine but it should be integrated specifying that compliance with national labelling requirements still have to comply with FSC standard requirements – somehow recalling option (c). With reference to option (c), FSC might provide further guidance, but not to be added in the standard. Clause 3.5 Clause 3.5 should be also expanded, explicitly stressing that compliance with national labelling includes possible adoption of non-compulsory elements.
M, Economic North	Companies have the ability to understand the region that they are in and their products trademark requirements. There is not a need for FSC to be involved in patrolling this when major certificate holders using the trademark standard will be aware of their company requirements. Auditing resources should not be placed on this level of detail. They should instead focus on eligibility to use the trademark, additional details, and correct promotions.
FSC Staff	In addition to b) we would suggest giving all the help and guidance possible here to assist certificate holders. Although the decision must reside with them, FSC could at least provide an Annex (which would need updating but could have a disclaimer to alert CH to verify status in their country). Advice given here could be similar in tone to that of previous EUTR advice notes in FSC-DIR-40-004 in explaining to CH how their use must also comply with legality etc.
FSC Staff	Every companies basically have to meet their local labeling requirements so FSC don't have to require it. And we should avoid asking too much of CHs who are not regarding national legislation issue.
Consultant	Standard should be kept as simple as possible while allowing flexibility.
FSC Staff	Clause 3.5. It is not clear the linkage between clause 3.5 and the option of adding or removing label elements as seems to be proposed in the questions above. It looks like this is a generic clause that has nothing to do with FSC labels or label elements. I am a bit confused with this question. Are we proposing that labels can be simplified in all cases, even where there is enough space in the product for using the full label (not the mini label)? Or is the question only about Product Type information? The note identified with (*) gives the impression that these questions only refer to Product Type information and not to the other elements of the label.
FSC Staff	Background: On 21 July 2016 the German Federal Supreme Court (reference I ZF 26/15) decided that in case of the commercial use of test seals/quality labels ("Prüfzeichen") they may only be published together with a source (which is usually the website address), where further information on the test criteria can be found. 3.3: Add "(*)" behind "FSC website address" and add a footnote: "(*) Compulsory in some countries"
FSC Staff	I would go for a) and b) option as it is situation in CIS + gives more "flexibility".
CH	Note for stakeholders Option (b), that results in Clause 3.5, is fine but it should be integrated specifying that compliance with national labelling requirements still have to comply with FSC standard requirements – somehow recalling option (c). With reference to option (c), FSC might provide further guidance, but not to be added in the standard.

At the moment, only certificate holders are allowed to make labelling arrangements with their suppliers. FSC is frequently asked if it would be possible to make arrangements to use a code by retailers or brand owners that have a licence to promote FSC-certified products for this purpose as well. The background for these requests is most often simplification of the administration process of designs and approvals for companies with many suppliers all using their own codes, and/or business considerations on not disclosing specific suppliers. The code of the uncertified organization would still be available on info.fsc.org and the products with agreements would be verified by FSC trademark service before promotion. This consultation will be carried out over two revision processes: revision of FSC-STD-50-001 (this document) and FSC-STD-50-002 on trademark use requirements for non-certificate holders scheduled for 2017–2018.

Stakeholders are asked to provide their view on whether:

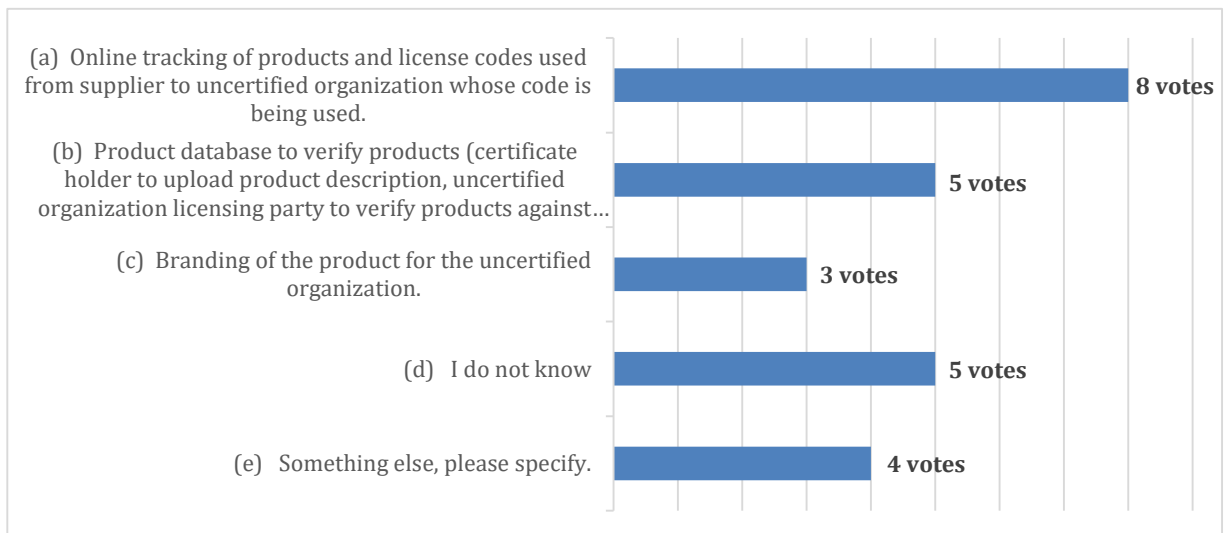
- (a) On-product labels should always carry only the certificate holder licence code, i.e. labelling agreements shall be possible only with certificate holders.
- (b) On-product labels could carry uncertified organization’s (brand owners, retailers, or any other organization that is not required to obtain certification) licence code instead of certificate holder’s when an adequate labelling agreement is in place.
- (c) On-product labels could carry the uncertified organization’s code instead of the certificate holder’s code only if additional safeguards are in place (see next question).
- (d) I don’t know



If additional safeguards would be required, which ones would be most important?

- (a) Online tracking of products and license codes used from supplier to uncertified organization whose code is being used.
- (b) Product database to verify products (certificate holder to upload product description, uncertified organization licensing party to verify products against the database).
- (c) Branding of the product for the uncertified organization.
- (d) I do not know
- (e) Something else, please specify.





The question was answered by 21 stakeholders. Please note that each respondent was able to select one or more options.

*Specifications on answer (e):*

CB, Economic North	Should require traceability to be able to identify which supplier produced/labelled the product in case of problems in the supply chain. Each supplier will be audited but hard to trace back to specific supplier if a product is mislabeled since there could be several suppliers using the same license code of the non-certified org. Perhaps a letter following the license code where only the non-certified org knows which of their suppliers is assigned to that code?
M, Economic North	Option1. Managed by National Initiative during first 3-5 year period and after change in demand or licensing occurs where it is no longer manageable by the national initiative a new solution should be created. Option2. Self-reported numbers by the license holder to the national initiative with contract wording that allows the national initiative to check records in the case that complaints occur.
CH	The certification company to ensure that everything is ok.

*Additional comments related to this consultation question:*

M, Social North	We must make it as easy for brands with FSC license codes to use the logo as possible, assuming they are correctly sourcing and labeling their brand products. Stream-lining the process is a benefit to everyone and encourages greater use of the logo.
FSC staff	This would be a welcome addition to the FSC system. Option B, on-product labels could carry uncertified organization's license code instead of the certificate holder's when an adequate labelling agreement is in place. No additional safeguards should be required as the non-certified organization's information is reviewed as part of the trademark licensing process. Before further consultation on this question is carried out, the written background information should be clarified and the improper use of English grammar must be corrected. I've had a number of conversations with stakeholders who didn't understand the situation correctly because the explanation given was extremely confusing. Suggested wording: Note for stakeholders: The current FSC standards allow certificate holders to make labelling

	<p>arrangements only with their certified suppliers. FSC is frequently asked if it would be possible to expand labelling arrangements to include the use of a retailer or brand owner's license code on a product, provided they have a license to promote FSC-certified products. The nature of these requests is most often to simplify the design and approval process for the retailer or brand manager with many suppliers, all using their own license code. Other requests are for business considerations when a company would prefer to not disclose their specific suppliers. The code of the trademark license holder would be available on <a href="http://info.fsc.org">info.fsc.org</a> and the products with labelling agreements would be verified by an FSC trademark service before promotion.</p>
CB	<p>The availability of noncertified companies to use the FSC label will make more complicated to manage the label's use.</p>
CH	<p>No we are simply against non-certified organizations to be able to label... With reference to the note for stakeholders on page 12 of the EN Requirements for use of the FSC Trademarks by certificate holders 4885 we would like to give the following comment: We absolutely do not agree (in fact we strongly disagree) with the suggested change by FSC in allowing the establishment of a labeling agreement between us (certificate holder) and non-certificate holders (our customers) in allowing the non-certificate holders to ask us to label our products with their license number. We currently supply at least 1.600 customers in The Netherlands alone. We have a 24-hour sale and delivery system for stock doors. Our stock currently consists of tens of thousands of FSC doors and it is simply not feasible for us to relabel the already labeled stock doors for a large number of our clients. Please know that it is completely clear to us that this change is not obligatory for us (suppliers). However we expect that this might give our customers more negotiating powers and that we are not able to withstand their requests due to commercial importance. Hence although it seems as if we have a "free choice" whether to comply or not, in reality this is not the case. We also do not think that this proposed change fits the common intentions of all economic parties involved in wanting to simplify the system and diminish the administrative workload, which was supported by the signed covenant on 22nd March 2017 "Bevorderen duurzaam bosbeheer" in NL. This covenant was supported and signed also by FSC NL. We simply do not understand what advantage this proposed change offers. The on-product FSC label remains unchanged, only the CoC number under the logo changes. Customers of ours who would like their own CoC code to be displayed can now obtain their FSC certification and can subsequently establish a labeling agreement with us (their supplier) in order to display their own CoC code on the label. Hence this new proposed change to us feels as an advantage for our customers (at no extra costs), whereas we (suppliers) carry the complete burden of administrative measures and costs in turn.</p>
FSC Staff	<p>Note for stakeholders Option (a) is preferred in the first set of options. Option (a) is preferred in the second set of options. Other options could be considered as well, for example: - Please, consider the opportunity to make the use of OCP compulsory, in combination with option (a); - alignment of clauses in TMK contractual matters, e.g. long-term commitment toward TMK License Agreement under FSC-STD-50-002 and clear identification of the TSP "scope".</p>
M, Economic North	<p>I do not think that these questions were correctly asked. There is not a risk to labeling under a license holder that warrants an online database or extra management. Especially when this is going to be low and slow uptake at first.</p>

	<p>Because certification is going to still be required on the product it does not make sense to require further checks. Also I have concerns that brands may not have been solicited to comment that have historically asked this question. Are we asking the right questions to the right stakeholders? Looking at the FSC strategic plan allowing this to occur will assist in new markets and products using the label in the future and a streamlined point where verification is occurring on the important parts of the supply chain like the forest and the manufacturers instead of the detail of what code is on a trademark that the consumer sees for a global brand.</p>
FSC Staff	<p>FSC UK are strongly not in favour of allowing N-code on-product. This we feel would prove a significant disincentive for certification as presently, non-disclosure of supply chains through C-codes of suppliers on labels is one of the main incentives for brands/retailers to become certified. Current online tools, their effective development and maintenance are not FSC's strong point and therefore it feels risky to promise safeguards that we currently cannot deliver. These safeguards are not defined clearly enough here to make base such a fundamental decision on. This proposal relies on the TSP network to manage the verification of these agreements and promotion. As a TSP we would argue that we are not equipped to manage this. The current system of providing evidence and artwork is already too burdensome in administrative terms. We find it almost impossible to ensure that our big retailers are buying finished labelled products, directly from a certified company. They do not understand the FSC system. They often promote non-certified products as certified. Their certified products regularly come through broken chains, bought from uncertified brokers. Or they buy them from an uncertified company arguing that their supplier "uses certified timber" as if this was sufficient. They do not understand the difference. We know from experience that the retailer/brand owner often has an important role in designing the labelling of products (FSC, own-brand, and other labelling requirements). The retailer would soon have access to a range of FSC labels with their own licence code. The chances of the non-certificate holder providing this label to other non-certified companies is very high - whether this is accidentally, intentionally or in good faith believing themselves to be following the FSC system. How will it be possible to check if the proposed system has gone wrong? If a non-certificate holder gives the label to their new supplier (a non-certified company) to apply to a non-certified product how could we know? How can we verify that the label is valid? At the moment we can check that the license code belongs to an FSC-certified company, that the certificate is valid and the product in scope. From a trademark protection point of view it becomes much harder to verify when this information is hidden within a labelling agreement. If a product is mislabeled in the proposed scenario, who is legally responsible, the non-certificate holder or the un-certified company who applied their label? Currently responsibility for labelling mistakes rests with a certified company and the Certification Body can impose a Corrective Action Request and ultimately terminate the certificate for non-compliance. We TSPs do not have such a rigorous system. At the moment there are no FSC guidelines for how to deal with non-compliant non-certificate holders and insufficient legal team backup for such cases. This will be confusing to consumers. How can we explain to the consumer why there are two possible codes that might appear on the product and what this means? It is incredibly difficult to explain to the public how this final non-certificate holder step works or why it is credible. Or to explain to FSC-certified companies what a non-certificate holder is and why some companies are allowed to do this rather than be FSC certified. We</p>

	claim that third party auditing is what makes our system rigorous. At the highest level, in our “Ten Reasons to Choose FSC” we state that “Every process and decision we make is open to public review and our product claims are independently audited.” Yet here we are proposing that the on-product label, the cornerstone of how our system is presented to the public, is to show the code of an uncertified company.
M, Economic North	FFIF supports the option a) i.e. on-product labels should always carry only the certificate holder license code. This simplifies the administration process of certificate holders when they can use their own code instead of customers' codes.
FSC Staff	The additional safeguards are unreasonable because uncertified organizations' products are usually too many varieties to track and record.
Consultant	Standard should be kept as simple as possible while allowing flexibility.
FSC Staff	This is a very risky situation for the system credibility. If retailers are allowed to use their license codes on products, minimally, they should use the OCP. Otherwise, they are acting as a certificate holder via trademark license agreement. They could easily ask non-certified manufacturers to print their label on products and we would never know it. I think we should not change the rules until we have clarity about the future of the OCP and certainty about its deliverables. And even if FSC introduces this requirement in the system, it should be first pilot-tested, so we can see how it would work before incorporating it into the standard. Regarding the safeguard options above, I must say that it was difficult to provide an opinion because they are unclear. I marked options a and b because I understand that there is some level of control on the quantities of products that are being labelled. I assume that option a has the OCP behind and option b sounds like creating a new database for this purpose (?) Option c is very much unclear. It is unclear how "branding of the product for the uncertified organization" would work and how this would safeguard the system. Sorry for the criticism, but I think we need to be careful on how consultation questions are written. When we are unclear, we miss the opportunity to obtain valuable feedback from stakeholders. If other stakeholders also report un clarity of the questions, FSC should consider whether the results obtained are valid measurement of stakeholders' opinions.
FSC Staff	Definitely option A because: a/- that gives us a better visibility of the supplier(s) what is crucial in some cases (imagine a brand's personalized product and packaging supplied by a few suppliers: the product could look exactly the same, with the same FSC-N license number: How would you distinguish which pack was supplied by which supplier? That could be tricky to spot infringements/infringers: ex charcoal. b/- this identification of the suppliers due to FSC-C license number is the perfect argument that helps us get the end of the supply chain certified Remarks / questions : - Online tracking : do you mean the OCP ? (that is a tool that is not chosen by retailers who tend to have their own system and are not really open to connect to other system) - Shifting the responsibility to the uncertified organization to verify products against the data base indirectly shifts the responsibility and workload to the TSP and that is not wished!
CB	Not sure I understand points a-c. Seems we are going back to the OCP that has for now been left out of the COC STD. I understand the request from the non-certified license holders but it may be difficult to maintain the chain if the product is label with a retailer number. At the moment there is no

	requirements for an audit at a retailer. So option C may be the best option if the retail is audited.
CH	Maybe audits at the retailers?
FSC Staff	I see it as open space for misuse.
CH, Economic North	Option a) simplifies the administration process of certificate holders when they can use their own code instead of customer's codes

Table B: Individual comments by section and clause

<p>Introduction</p>	<p>This document contains the requirements and guidelines for use of Forest Stewardship Council trademarks by FSC certificate holders. It covers labelling and promotion of products with FSC trademarks as well as promotion of an organization’s status as an FSC certificate holder.</p> <p>Labelling the products and promoting them with FSC trademarks helps consumers make informed decisions about the products and materials they purchase. Therefore, it is essential that they are used correctly, do not mislead customers and the public about certification claims, and are not associated with quality aspects beyond those covered by FSC certification.</p> <p>The FSC trademarks are the primary communication tool for FSC certificate holders to demonstrate that their products meet the standards set by FSC. As FSC licence holders, certificate holders have an important role in protecting the joint investments that licensees as users and FSC as the trademark owner have made to develop the FSC system. These requirements are established to ensure accuracy of messaging about the meaning of FSC, and to enhance unified presentation of these messages to amplify recognition of the licensee’s accomplishments.</p> <p>In addition to these requirements, FSC provides tools to help certificate holders promote and label products – for example, by providing a label generator and a marketing toolkit with guidance and ready-to-use examples on how to create promotional materials in line with the FSC brand. For certificate holders, FSC provides an online training course on use of the trademarks. Access to the online services for certificate holders is arranged by their certification bodies.</p> <p>On the FSC website, there is a quick guide to FSC trademark use that summarizes the core requirements presented in this document.</p> <p>Please note that the FSC trademarks can be used on products only by holders of FSC chain-of-custody (CoC) certificates or joint FSC forest management and chain-of-custody (FM/CoC) certificates.</p>
<p>M, Economic North</p>	<p>If licensing becomes allowed as an on product claim the final paragraph in this 1st page above the version history would need to be changed to highlight that.</p>
<p>FSC staff</p>	<p>Introduction: 3rd paragraph - suggest replacing first use of 'licences' with 'they' and second use with 'Certificate Holders' - better sentence structure. Also recommend omitting the word 'meaning' (the meaning of FSC) as this is not terminology which we commonly use in relation to FSC. Grammar note: 4th paragraph - Please amend to: 'for example, by providing a label generator and a marketing toolkit with guidance on and ready-to-use examples of how to create promotional materials in line with the FSC brand'. Also 'For certificate holders, FSC provides an online training course on use of the trademarks' - please give guidance here on where to find it/how to access it. 'On the FSC website, there is</p>

	<p>a quick guide to FSC trademark use that summarizes the core requirements presented in this document'. This is rather a passive statement. Suggest amending to: The Quick Guide to FSC Trademark Use is available on the FSC website and summarizes the core requirements in this document. Can we put a link to this document in? Or a link to the FSC document centre, if this document is listed in the document centre. And/or can this document be added to the FSC Trademark portal so that this can be found centrally and easily. Editorial Note - extra space before 'Please note that the FSC trademarks... 'Can 'on-product' / 'on products' be used consistently throughout the standard. In general, our Certificate Holders refer to labels on products as 'on-product labels' and the use of the trademarks 'on-product'. It would be good to standardize this terminology here. FSC chain-of-custody - Not in line with FSC Style Guide (FSC Chain of Custody?).</p>
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Version history	<p>V1-0 The first version of the requirements approved in January 2010 combined several documents and gathered together all clauses on trademark use previously presented over number of standards and guidelines. V1-0 also introduced new on-product labels for the FSC system.</p> <p>V1-1 The minor reviews in February and November 2010 clarified language and terminology and presented some improvements on graphical requirements based on stakeholder comments to ease the use of the new labels.</p> <p>V2-0 To be added</p>
CB	Version History: Missing mention of V1-2 B.

Objective	<p>The objective of this standard is to set minimum requirements and provide recommendations for FSC trademark use for labelling and promotion of FSC-certified products and for promotion of FSC certification.</p>
CB	<p>FSC provides an online training course on use of the trademarks. The standard should not make it feel like it is difficult to achieve compliance so rather than calling it a training course, how about 'online guidance'? This should be easily available for use by Auditors and other CB personnel (with a more detailed training course/exam being used for approvers).</p> <p>The objective of this standard is to set minimum requirements and provide recommendations for FSC trademark use Recommendations are subjective and unless ASI are thoroughly versed in the subjective nature of the recommendations, then we should stick with requirements and not recommendations.</p>
FSC Staff	<p>Objective: 'and promotion of FSC certification' - this implies promotion of the FSC certification scheme? Should this therefore read 'and an organization's status as an FSC certificate holder' as per the introduction?</p>
CB	<p>The new standard is much better than before, regarding to rules for logo usage. However, we propose this standard could be use with a stronger propose.</p> <p>Objective: The objective of this standard is to provide strategic information regarding certification's impacts, benefits of being certified, to set minimum requirements and provide recommendations for FSC trademark use for labelling and promotion of FSC-certified products and for promotion of FSC certification. Also, to contribute on different public's engagement, Work as an education tool</p>

to contribute on certification’s translation to different publics, to engage them, and to highlight the certification’s impacts and benefits, with an easygoing communication strategy. Also, that includes the sites and its functionalities: trademarkportal.fsc.org - FSC Marketing Toolkit, info.fsc.org. Also, presents the mains structure, the FSC Global Marketing Survey, how the use of logo contributes with FSC Strategic Plan; how it can contribute to a market’s view within the company.

Scope	<p>Adherence to this standard is mandatory for all FSC certificate holders that are entitled to use the FSC trademarks; it sets out how to use the FSC trademarks correctly. The standard covers use of the FSC trademarks on FSC-certified products, use for promotion of FSC-certified products, and use for promotion of the company’s status as an FSC certificate holder. This standard forms the basis for evaluation and approval by FSC-accredited certification bodies of all certificate holders’ use of FSC trademarks.</p> <p>Elements for making FSC claims on invoices and delivery documents are defined in chain-of-custody standard FSC-STD-40-004 and are not affected by these requirements.</p> <p>This standard replaces:  FSC-ADV-50-003 <i>Labelling of Products from Small and Community Producers</i>, clause 2.5  FSC-ADV-50-004 <i>Requirements for Use of the Forest-for-All-Forever Trademarks by Certificate Holders</i></p>
CB	Scope: The standard's applicability to project certification isn't mentioned here.
FSC Staff	Scope: 'Elements' is an odd choice of word and not one which is used anywhere else. Would 'requirements' be a better choice?

Standard effective date	<table border="0"> <tr> <td>Approval date</td> <td>to be added</td> </tr> <tr> <td>Publication date</td> <td>to be added</td> </tr> <tr> <td>Effective date</td> <td>to be added</td> </tr> <tr> <td>Transition period</td> <td>to be added</td> </tr> <tr> <td>Period of validity</td> <td>to be added</td> </tr> </table> <p>Please note that existing stocks of labelled products and promotional materials that have been approved as correct according to previous versions of the FSC trademark standards may continue to be used and distributed.</p>	Approval date	to be added	Publication date	to be added	Effective date	to be added	Transition period	to be added	Period of validity	to be added
Approval date	to be added										
Publication date	to be added										
Effective date	to be added										
Transition period	to be added										
Period of validity	to be added										
CB	Important note is hidden here. We get a lot of questions for clients about existing stocks. Suggest to move it someone more prominent.										
CB, Economic North	The note about existing stocks is hidden here. We get a lot of questions for clients about existing stocks when the requirements change. Suggest to move it someone more prominent.										



References	<p>FSC-STD-40-003 Chain of Custody Certification of Multiple Sites  FSC-STD-40-004 Chain of Custody Certification  FSC-STD-40-005 Standard for Company Evaluation of FSC Controlled Wood  FSC-STD-40-006 FSC Chain of Custody Standard for Project Certification  FSC-STD-40-007 Sourcing Reclaimed Material for Use in FSC Product Groups or FSC Certified Projects</p>
CB, M, Economic North	<p>References: It looks like if this is not applicable to any Forest Management Standard. How is this addressed? There is no indicator for that in the National Standards. Do FM Certificate Holder not need to approve their trademarks? You should at least reference the License Agreement as well, to make that clear, that that is not the case?</p>
FSC Staff	<p>References: With regard to the current TM interpretations – have any of these been absorbed into this standard? We could not see instances of them being. Perhaps this is because the interpretations are so specific – in which case, will the body of current interpretations remain but be updated in terms of the clause numbers? Also the FAQ document - will this be absorbed into this standard? We reviewed the FAQ on Trademark Use by FSC Certificate Holders and found that some of the questions had been absorbed. We could not find the following answers reflected in the draft standard: 2. Two licence codes can be used in one Promotional Panel on a single promotional piece – for example when an organization owns two separate enterprises with two different certificates. 7. The initial FSC and the name Forest Stewardship Council can be translated into other languages as long as they are not replaced by a translation – a translation may be placed into brackets after the initials or the name in English. 20. Permitted use of Labels inside envelope flaps and inside boxes of pharmaceuticals (not explained in 4.2) 30. Clarification of what counts as a ‘visible’ place for the label Also Trademark Quick Guide for Certificate Holders document – page 8: 3) Where no unprinted white areas are available, in a printed item using standard or limited colors, a transparent label may be used – provided the label elements are reproduced in black or white on a background color that gives sufficient contrast. This does not appear to be reflected in the standard. Also the TM guidance which is sent out as part of the TSP updates - will this be absorbed into this standard where applicable to trademark use by Certificate Holders?</p>

*General comments related to this introductory section:*

M, Social North	<p>I have worked with over two hundred small family run businesses who often get certified because they believe in the FSC vision for responsible forest stewardship. They are passionate small operations with often only 2 or 3 staff. They don't have professional communications or graphic design staff. They try to use the FSC logos but their experience is often one of getting turned down over and over again for minor infractions until they give up. Their proposed use normally meets the intent of the standard but doesn't always meet the "letter of the law." After three or four times of trying to correct their use and gain approval they give up and sour to the idea. They end up not promoting the certification and not communicating to external partners their support of our mission and vision for healthy forests. I don't believe this is our intent as an FSC governing body. We are not trying to discourage use of the trademarks by small family businesses. However, we are in affect deterring them by not signaling to CBs and ASI to use common sense, scale of the business (small family operation</p>
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	<p>promotional flier vs Kimberly Clark nationwide product label), and judgement. To correct the problem we need the standard to signal that it is okay for reviewers to use professional judgement and common sense when reviewing trademark use. I recommend having a statement in this section of the trademark standard that gives guidance to businesses, CBs, and ASI to exercise common sense when gauging conformance to the trademark standard. It is easy to get draconian in auditing to the letter of the standard vs the intent using common sense. A clear statement from FSC International via our standard stating that reviewers have the leeway to use common sense will avoid unnecessary bad feelings, benefit small family operations, and will increase trademark use helping us achieve our 2020 strategic plan goals.</p>
CH	<p>Please, note that in the footnote the standard name is recalled, but the ® symbol is omitted in the title, whereas in the cover page it is included. So, the ® symbol should be used in the footnote as well. It would be very useful to provide a link, or at least a clear reference to the relevant FSC website page/section, to easily access the training platform where the “online training course on use of the trademarks” is available. Whereas the standard states that “Access to the online services for certificate holders is arranged by their certification bodies”, access might be arranged by FSC itself, as it recently happened with the Controlled Wood online training course. The two pieces of information on the online training course and the quick guide to FSC trademark use should be presented together in the same paragraph; again, at least a clear reference to the relevant FSC website page/section should be made for the quick guide to FSC trademark use. The introduction should be expanded, especially in its final part, so as to better explain the difference between on-product and off-product use of trademarks, which stakeholders are allowed to do what, also explicitly referring to FSC-STD-50-002. Particularly, it would be worth recalling information provided in Box 1 in FSC-STD-40-004 V3-0, point (d), i.e. stressing that CoC certification is required for all organizations in the supply chain of forest-based products that have legal ownership of certified products and (d.) promote FSC-certified products, except finished and FSC-labelled products that may be promoted by non-certificate holders (e.g. retailers) in accordance with FSC-STD-50-002 “Requirements for Promotional Use of the FSC Trademarks by Non-Certificate Holders”. It would be also worth to stress, in a captivating way, that use of FSC trademarks by Certificate Holders is not compulsory, but still highly recommended.</p>
CB	<p>Please, note that in the footnote the standard name is recalled, but the ® symbol is omitted in the title, whereas in the cover page it is included. So, the ® symbol should be used in the footnote as well. It would be very useful to provide a link, or at least a clear reference to the relevant FSC website page/section, to easily access the training platform where the “online training course on use of the trademarks” is available. Whereas the standard states that “Access to the online services for certificate holders is arranged by their certification bodies”, access might be arranged by FSC itself, as it recently happened with the Controlled Wood online training course. The two pieces of information on the online training course and the quick guide to FSC trademark use should be presented together in the same paragraph; again, at least a clear reference to the relevant FSC website page/section should be made for the quick guide to FSC trademark use. The introduction should be expanded, especially in its final part, so as to better explain the difference between on-product and off-product use of trademarks, which stakeholders are allowed to do what, also explicitly referring to FSC-STD-50-002. Particularly, it would be worth recalling information provided in Box 1 in FSC-STD-40-004 V3-0, point (d), i.e. stressing that CoC</p>

	<p>certification is required for all organizations in the supply chain of forest-based products that have legal ownership of certified products and (d.) promote FSC-certified products, except finished and FSC-labelled products that may be promoted by non-certificate holders (e.g. retailers) in accordance with FSC-STD-50-002 “Requirements for Promotional Use of the FSC Trademarks by Non-Certificate Holders”. It would be also worth to stress, in a captivating way, that use of FSC trademarks by Certificate Holders is not compulsory, but still highly recommended.</p>
FSC Staff	<p>Omission: There needs to be a clause or section in the standard that addresses FSC trademark use on social media. FSC trademarks are increasingly being used on social media. For some companies, this is the primary mechanism for promoting FSC-certified products, so it is critical that the standards are implemented consistently. Social media wasn’t as prevalent when the trademark standard was developed, so there isn’t clear direction on what is allowed and what needs to be approved. For example, companies may send a social media post that uses FSC in the text, includes a photo of the FSC logo, or tags FSC using a twitter handle or hashtag. Are some or all of these uses subject to trademark approvals? What if a post is shared or re-posted? There is confusion among certificate holders and, due to a lack of guidance from FSC, inconsistent interpretation between certification bodies. Another example that we’ve dealt with was when a large tissue producer in the US developed some social media messaging around FSC that included the logo, text and a tag of FSC US. They submitted it to their certification body who did not approve it because they didn’t understand how social media operated and how FSC standards should apply. They came to FSC US who worked with the CB to have the content approved. This all took nearly a week to discuss the details when it should have been covered as a normal trademark approval.</p>
FSC staff	<p>Please, note that in the footnote the standard name is recalled, but the R symbol is omitted in the title, whereas in the cover page it is included. So, the R symbol should be used in the footnote as well. It would be very useful to provide a link, or at least a clear reference to the relevant FSC website page/section, to easily access the training platform where the “online training course on use of the trademarks” is available. Whereas the standard states that “Access to the online services for certificate holders is arranged by their certification bodies”, access might be arranged by FSC itself, as it recently happened with the Controlled Wood online training course. The two pieces of information on the online training course and the quick guide to FSC trademark use should be presented together in the same paragraph; again, at least a clear reference to the relevant FSC website page/section should be made for the quick guide to FSC trademark use. The introduction should be expanded, especially in its final part, so as to better explain the difference between on-product and off-product use of trademarks, which stakeholders are allowed to do what, also explicitly referring to FSC-STD-50-002. Particularly, it would be worth recalling information provided in Box 1 in FSC-STD-40-004 V3-0, point (d), i.e. stressing that CoC certification is required for all organizations in the supply chain of forest-based products that have legal ownership of certified products and (d.) promote FSC-certified products, except finished and FSC-labelled products that may be promoted by non-certificate holders (e.g. retailers) in accordance with FSC-STD-50-002 “Requirements for Promotional Use of the FSC Trademarks by Non-Certificate Holders”. It would be also worth to stress, in a captivating way, that use of FSC trademarks by Certificate Holders is not compulsory, but still highly recommended.</p>

FSC staff	<p>Please, note that in the footnote the standard name is recalled, but the R symbol is omitted in the title, whereas in the cover page it is included. So, the R symbol should be used in the footnote as well. It would be very useful to provide a link, or at least a clear reference to the relevant FSC website page/section, to easily access the training platform where the “online training course on use of the trademarks” is available. Whereas the standard states that “Access to the online services for certificate holders is arranged by their certification bodies”, access might be arranged by FSC itself, as it recently happened with the Controlled Wood online training course. The two pieces of information on the online training course and the quick guide to FSC trademark use should be presented together in the same paragraph; again, at least a clear reference to the relevant FSC website page/section should be made for the quick guide to FSC trademark use. The introduction should be expanded, especially in its final part, so as to better explain the difference between on-product and off-product use of trademarks, which stakeholders are allowed to do what, also explicitly referring to FSC-STD-50-002. Particularly, it would be worth recalling information provided in Box 1 in FSC-STD-40-004 V3-0, point (d), i.e. stressing that CoC certification is required for all organizations in the supply chain of forest-based products that have legal ownership of certified products and (d.) promote FSC-certified products, except finished and FSC-labelled products that may be promoted by non-certificate holders (e.g. retailers) in accordance with FSC-STD-50-002 “Requirements for Promotional Use of the FSC Trademarks by Non-Certificate Holders”. It would be also worth to stress, in a captivating way, that use of FSC trademarks by Certificate Holders is not compulsory, but still highly recommended.</p>
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## 1. Ground Rules for Using the FSC Trademarks

<p>Clause 1.1</p>	<p>The Forest Stewardship Council AC (FSC) owns the following registered trademarks:</p> <ul style="list-style-type: none"> <li>(a) the name ‘Forest Stewardship Council’</li> <li>(b) the initials ‘FSC’</li> <li>(c) the FSC ‘checkmark-and-tree’ logo</li> <li>(d) the ‘Forests For All Forever’ – full mark</li> <li>(e) the ‘Forests For All Forever’ – logo with text mark</li> </ul>
<p>CH</p>	<p>It seems there is a general confusion on the adopted terminology. - In the glossary, “FSC logo” is defined as “FSC checkmark-and-tree with initials ‘FSC’”, whereas in some Clauses the term “logo” seems to be referred to the Forests For All Forever trademarks as well (e.g. see Clauses 4.5 and 5.3); - In Clause 5.3 “logo” and “mark” appear as two different (though still similar) trademarks, the former referring to the FSC checkmark-and-tree with initials, the latter to the Forests For All Forever trademarks. The same distinction is made in Clause 5.4. Nonetheless, the term “mark” is not specified in the Glossary; - Depending on the fact that “logo” and “mark” indicate two different things or not, Clauses 1.1 (d) and (e) should be refined and/or adapted accordingly. For example, “Forests For All Forever – logo with text mark” appears as a single TMK identification, whereas it could be the sum of “FSC logo” and “Forests For All Forever text mark”. In the same way, “Forests For All Forever – full mark” could be identified as the sum of “FSC logo” and “Forests For All Forever full mark”. - In Clause 5.5 a double</p>

	<p>reference is made, to “text mark” and to “mark”. Nevertheless, “text mark” refers only to FFF text mark, whereas the general provision “mark” seems attributable both to FFF full mark and to FFF text mark. But it is not actually clear, and should be better specified. Again, the term “mark” should be defined in the Glossary. Clause 1.1 d) Please, note that in the Marketing Toolkit the “Forests For All Forever – full mark” is referred to as “Full Brandmark”. Clause 1.1 e) Please, note that in the Marketing Toolkit the “Forests For All Forever – logo with text mark” is referred to as “Text only Brandmark”.</p>
CB	<p>It seems there is a general confusion on the adopted terminology. - In the glossary, “FSC logo” is defined as “FSC checkmark-and-tree with initials ‘FSC”, whereas in some Clauses the term “logo” seems to be referred to the Forests For All Forever trademarks as well (e.g. see Clauses 4.5 and 5.3); - In Clause 5.3 “logo” and “mark” appear as two different (though still similar) trademarks, the former referring to the FSC checkmark-and-tree with initials, the latter to the Forests For All Forever trademarks. The same distinction is made in Clause 5.4. Nonetheless, the term “mark” is not specified in the Glossary; - Depending on the fact that “logo” and “mark” indicate two different things or not, Clauses 1.1 (d) and (e) should be refined and/or adapted accordingly. For example, “Forests For All Forever – logo with text mark” appears as a single TMK identification, whereas it could be the sum of “FSC logo” and “Forests For All Forever text mark”. In the same way, “Forests For All Forever – full mark” could be identified as the sum of “FSC logo” and “Forests For All Forever full mark”. - In Clause 5.5 a double reference is made, to “text mark” and to “mark”. Nevertheless, “text mark” refers only to FFF text mark, whereas the general provision “mark” seems attributable both to FFF full mark and to FFF text mark. But it is not actually clear, and should be better specified. Again, the term “mark” should be defined in the Glossary. Clause 1.1 d) Please, note that in the Marketing Toolkit the “Forests For All Forever – full mark” is referred to as “Full Brandmark”. Clause 1.1 e) Please, note that in the Marketing Toolkit the “Forests For All Forever – logo with text mark” is referred to as “Text only Brandmark”.</p>
FSC staff	<p>It seems there is a general confusion on the adopted terminology. - In the glossary, “FSC logo” is defined as “FSC checkmark-and-tree with initials ‘FSC”, whereas in some Clauses the term “logo” seems to be referred to the Forests For All Forever trademarks as well (e.g. see Clauses 4.5 and 5.3); - In Clause 5.3 “logo” and “mark” appear as two different (though still similar) trademarks, the former referring to the FSC checkmark-and-tree with initials, the latter to the Forests For All Forever trademarks. The same distinction is made in Clause 5.4. Nonetheless, the term “mark” is not specified in the Glossary; - Depending on the fact that “logo” and “mark” indicate two different things or not, Clauses 1.1 (d) and (e) should be refined and/or adapted accordingly. For example, “Forests For All Forever – logo with text mark” appears as a single TMK identification, whereas it could be the sum of “FSC logo” and “Forests For All Forever text mark”. In the same way, “Forests For All Forever – full mark” could be identified as the sum of “FSC logo” and “Forests For All Forever full mark”. - In Clause 5.5 a double reference is made, to “text mark” and to “mark”. Nevertheless, “text mark” refers only to FFF text mark, whereas the general provision “mark” seems attributable both to FFF full mark and to FFF text mark. But it is not actually clear, and should be better specified. Again, the term “mark” should be defined in the Glossary. Clause 1.1 d) Please, note that in the Marketing Toolkit the “Forests For All Forever – full mark” is referred to as “Full Brandmark”. Clause 1.1 e) Please, note that in the Marketing Toolkit the “Forests For All Forever – logo with text mark” is referred to as “Text only Brandmark”.</p>

FSC staff	<p>It seems there is a general confusion on the adopted terminology. - In the glossary, “FSC logo” is defined as “FSC checkmark-and-tree with initials ‘FSC”, whereas in some Clauses the term “logo” seems to be referred to the Forests For All Forever trademarks as well (e.g. see Clauses 4.5 and 5.3); - In Clause 5.3 “logo” and “mark” appear as two different (though still similar) trademarks, the former referring to the FSC checkmark-and-tree with initials, the latter to the Forests For All Forever trademarks. The same distinction is made in Clause 5.4. Nonetheless, the term “mark” is not specified in the Glossary; - Depending on the fact that “logo” and “mark” indicate two different things or not, Clauses 1.1 (d) and (e) should be refined and/or adapted accordingly. For example, “Forests For All Forever – logo with text mark” appears as a single TMK identification, whereas it could be the sum of “FSC logo” and “Forests For All Forever text mark”. In the same way, “Forests For All Forever – full mark” could be identified as the sum of “FSC logo” and “Forests For All Forever full mark”. - In Clause 5.5 a double reference is made, to “text mark” and to “mark”. Nevertheless, “text mark” refers only to FFF text mark, whereas the general provision “mark” seems attributable both to FFF full mark and to FFF text mark. But it is not actually clear, and should be better specified. Again, the term “mark” should be defined in the Glossary. Clause 1.1 d) Please, note that in the Marketing Toolkit the “Forests For All Forever – full mark” is referred to as “Full Brandmark”. Clause 1.1 e) Please, note that in the Marketing Toolkit the “Forests For All Forever – logo with text mark” is referred to as “Text only Brandmark”.</p>
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FSC staff	<p>1.1 d) and e) Please reconsider using the terms 'Full Mark' and 'Text Mark'. Full mark is misleading as without a Partial Mark, Full is a misnomer. There is text in both. We are already confused by this terminology which does not bode well for general use for CH. The use of these logos should be as simple as possible to encourage widespread use. Can we make their names really simple i.e. Forests For All Forever 1 and Forests For All Forever 2. Or just A and B? Also, if we refer to c) as the FSC 'check-mark-and-tree' logo this may confuse CH as both d) and e) also have this logo within them so we should not use with word logo here as in isolation you would not be able to make the deduction needed about the differences. Therefore, please reconsider the terms used here to distinguish between the all the trademarks. Make them as simple as possible and make them understandable in a stand-alone, isolated situation.</p>
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Clause 1.2	<p>In order to use the FSC trademarks, the organization shall have a valid FSC trademark licence agreement and hold a valid certificate.</p> <p>Note 1. Consultations for certification</p> <p>Organizations applying for forest management certification or conducting activities related to implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder communication.</p>
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CH	<p>Note 1 This note may appear as redundant and/or misleading. In fact, CW-related “certified” operations (CW/FM or CW codes in the context of CoC) already have the possibility to make use of FSC trademarks in the way recalled here. Differently, it’s not clear the objective of FSC trademarks use by FM applicants: some clear limitations should be specified, e.g. internal documents, communications with/to stakeholders, etc.</p>
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CB	<p>Note 1 This note may appear as redundant and/or misleading. In fact, CW-related “certified” operations (CW/FM or CW codes in the context of CoC) already have the possibility to make use of FSC trademarks in the way recalled here.</p>
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	Differently, it's not clear the objective of FSC trademarks use by FM applicants: some clear limitations should be specified, e.g. internal documents, communications with/to stakeholders, etc.
CB	Valid certificate Is a suspended certificate valid? 1.2 Note 1: for controlled wood applicants, do they use the (R) or (TM) symbols (without a licence code)?
CB, Economic North	Specify that valid does not mean suspended.
CB, Economic North	Note: What about projects? May applicant projects also refer to FSC by name and initials under certain circumstances? (Maybe this is already clearly permissible once they're an official applicant project?)
FSC staff	Note 1 This note may appear as redundant and/or misleading. In fact, CW-related "certified" operations (CW/FM or CW codes in the context of CoC) already have the possibility to make use of FSC trademarks in the way recalled here. Differently, it's not clear the objective of FSC trademarks use by FM applicants: some clear limitations should be specified, e.g. internal documents, communications with/to stakeholders, etc.
FSC staff	Note 1 This note may appear as redundant and/or misleading. In fact, CW-related "certified" operations (CW/FM or CW codes in the context of CoC) already have the possibility to make use of FSC trademarks in the way recalled here. Differently, it's not clear the objective of FSC trademarks use by FM applicants: some clear limitations should be specified, e.g. internal documents, communications with/to stakeholders, etc.
FSC staff	Note 1. Suggest the use of the word 'consultation' or 'communication during consultation' rather than just 'communication' in order to be clear about the context. General Note about the NOTES - can we explain somewhere in the draft what the Notes are - that they are guidance and not requirements?
FSC staff	Note 1. I don't understand this Note 1. First of all, what is "consultations for certification"? Is this something about public consultations? Is this a note that will stay in the standard or it is something that was added just for the purpose of this consultation. Also, Why is this note only related to FM applicants and organizations conducting activities related to CW? What do you mean with activities related to CW?

Clause 1.3	The FSC trademark licence code assigned by FSC shall be included with all applications described in this standard. It is sufficient to show the code once per product or promotional material.
FSC Staff	Amend: 'The FSC trademark licence code assigned by FSC to the FSC certificate holder shall accompany any use of the FSC trademarks. It is sufficient to show the code once on a product or in promotional materials.'
CH	Including the FSC Tm license code in all applications, even if only once per product or promotional material is an unnecessary extra administrative effort without any benefit for the CH or costumers, leading to reduced use of trademarks. In addition this is the opposite of simplification according to Motion 29.

Clause 1.4	The FSC logo and the 'Forests For All Forever' marks shall include trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. The symbol ® shall also be added to 'FSC' and 'Forest Stewardship Council' at the first or most
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	prominent use in any text, one use per material is sufficient (e.g. website or brochure). For use in a country where the trademark is not registered yet, use of symbol TM is recommended. The listing of registration status of the FSC trademarks by country and mark is available in the FSC trademark portal and marketing toolkit.
CH	The following statement should be added as a Note under the main Clause proposition, rather than within the main Clause itself: "The listing of registration status of the FSC trademarks by country and mark is available in the FSC trademark portal and marketing toolkit". In order to streamline, support and facilitate the use of FSC trademarks by CHs, it would be of great importance to join/merge together these two different available tools, i.e. FSC Trademark Portal and Marketing Toolkit.
CB	Use of TM is recommended – why is this optional? The list of registrations needs to have a document title (was Annex 1).
M, Economic South	It is not clear why the use of the symbol TM is only recommended and not mandatory. We consider it should be mandatory.
CB	If the use of TM is a recommendation and not a must would be wise the replace the text "For use in a country where the trademark is not registered yet, use of symbol TM is recommended. The listing of registration status of the FSC trademarks by country and mark is available in the FSC trademark portal and marketing toolkit." In to a NOTE under the requirement. It makes the requirement text smaller and easier to pay attention to what really matters.
CB	First use in each web page (for a website)?
CB, Economic North	Does this mean that for countries where the trademark is not yet registered they don't have to do anything if they choose not to? I.e. just FSC without I? What about if the use is for multiple countries where in some the trademarks are registered but not for all: then default to ® or I?
FSC staff	The following statement should be added as a Note under the main Clause proposition, rather than within the main Clause itself: "The listing of registration status of the FSC trademarks by country and mark is available in the FSC trademark portal and marketing toolkit". In order to streamline, support and facilitate the use of FSC trademarks by CHs, it would be of great importance to join/merge together these two different available tools, i.e. FSC Trademark Portal and Marketing Toolkit.
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FSC Staff	The illustrations in d) and e) show the TM registration symbol however this clause specifies R - this is misleading. The registration list specifies that this should be TM, which is correct? Please amend. Here we now refer to the 'Forests For All Forever' marks, rather than 'Full Mark' and 'Text Mark' - this is too general. See above and consider making these terms simple and easy to reference such as Forest For All Forever marks A and B. 'The listing of registration status of the FSC trademarks by country and mark is available in the FSC trademark portal and marketing toolkit.' In 9.8 this is referred to as Trademark Registrations by Country and Mark - please use this here for consistency if this is the correct title. Global distribution - is the correct symbol for this TM? This does not appear in the listing anymore and is still questioned by CH. Please encourage



	the use of the Trademark Generator here in order for CH to use the correct symbols. Note: there are some reported issues with the functionality and accuracy of the trademark generator when multiple countries are selected (i.e. the generator defaults at the incorrect time). Therefore, we would encourage a review of this tool prior to this.
CB, Economic North	In Clause 1.4, it says "at the first or most prominent use in any text" However, in websites, it is really difficult to define what is the "first or most prominent" as readers do not necessarily access to company website from the top page. So this phrase can be removed.
CB, Economic North	1.4 states: "The symbol ® shall also be added to 'FSC' and 'Forest Stewardship Council' at the first or most prominent use in any text, one use per material is sufficient (e.g. website or brochure)." I short clarification may be helpful to demonstrate that this rule is true for all (sub)pages of a website and not only for each page of a website.
CH, Economic South	1.4: It is not clear why the use of the symbol TM is only recommended and not mandatory. We consider it should be mandatory.
CH, Economic North	On product by certificate holders only Please drop any R/TM use or provide evidence that this is required to maintain the Trademarks. Legal advice says it is not necessary to use R/TM and it is really a nightmare for global acting companies creating a high frustration Level and costs
FSC staff	The way the current sentence is written sounds like the second sentence requires some additional action in relation to what is requested in the first sentence. This is because the term "also" used in the second sentence. I suggest the deletion of the word "also" from the sentence.
CH	"The symbol ® shall also be added to 'FSC' and 'Forest Stewardship Council' at the first or most prominent use in any text, one use per material is sufficient (e.g. website or brochure)." Please clarify whether this is per website (which could comprise of multiple pages) or per website page.
CH, Economic North	Since it is suggested that ANNEX 1 will be removed, in order to facilitate for certificate holders to have the correct and up to date trademark symbols automated reminder about updates to trademark symbols from FSC should be sent out to certificate holders (monthly/quarterly basis?)
CB	Clarification how to choose applicable registration symbols when trademarks are used promotionally – would be very helpful. Especially when promotional material is used on websites (usually accessible globally) or distributed globally? Does the symbol should be chosen depending on the location of the organization's headquarters (as explained in standard for non-certificate holders (10.3 NOTE) or other way?

Clause 1.5	Holders of group, multiple site, or project certificates shall refer to Annex A of this standard for additional requirements for the use of the FSC trademarks.
CB	Doesn't seem a requirement per se, more of guidance to CHs. Another note maybe?
FSC Staff	When certification of multiple sites is gained, this seems to be referred in the normative framework as 'Multi-site certification' not multiple site certification therefore perhaps this should read multi-site certificates?

Clause 1.6	The organization shall either have the trademark use management system in place or submit all intended uses of FSC trademarks to its certification body for approval. Please see Annex B for further information on the trademark use management system.
CB	Typo: replace “the” with “a” 1.6: Now says “all intended uses,” instead of “all new reproductions of FSC trademarks,” which implies even re-prints of already approved designs require approval.
FSC staff	The trademark management system is a very positive addition.
CB, Economic North	Typo: replace “the” trademark use management system with “a” trademark use management system. Also, will be important to calibrate how CBs are approving CHs’ management systems. Will this be included in 20-001? Or is 1.3.2 and 1.3.3 intended to cover this scenario of the CB approving the CH to use their own management system for trademark approvals?
Consultant	A strength of the FSC brand is that it is actively monitored by Third Party Certifiers. This is particularly important to ensure the appropriate use of the Trademark. Printers are essentially custom manufacturers. Their objective is to please their clients. The approval process requirement enables them to say they need to comply with FSC graphic standards and that they can’t get away with any deviation because use needs to be submitted for approval. The correct use of the trademark is also important to their clients so proof of approval they can print and place in job dockets is also important to them. Therefore, prefer not to offer self-approval status, particularly for members of our Group Certificate. This creates risk. Particularly with the group of small printers I manage because they do not do many jobs at all during an audit year. I am copied on the approvals and see that changes are requested by the Third Party Certifier often enough to verify the risk level. Also, as Group Manager I do not and will not assume responsibility for trademark use. The Group is too diverse and also I am not available at all times to check/approve the use for them. It is extremely efficient the way it presently is. Rainforest Alliance is very prompt with requests for changes and approvals. Printing has become a “just-in-time” business so the above is important. Companies within my Group do comment on the promptness of their required approvals. Additionally, I am the Group Manager for a number of small printers and am not at their premises except for an annual audit. Being copied on their approvals by Rainforest Alliance allows me to monitor their activity and to determine if extra training/explanation is required at time of audit. Also, it would add considerably extra time to audits for Group Managers as well as for Third Party Certifiers which I do not feel is the best use of our expertise. The suggested requirement for achieving self-approval by taking on-line training and passing an on-line test means that printers will need to invest more of their time than it takes to quickly submit a request for approval and file the approval appropriately for each FSC print job they produce. The lag time between FSC projects for many of the small printers in the OPIA Group is significant and the training can be easily forgotten. Fundamentally, each submission is a refresher training which is essential for many of FSC certified printers. Further to the above comments about the potential of weakening the brand, I express my opinion regarding the marketplace perception, specifically applied to printed products: Most printers have become FSC certified because of customer demand. If the FSC Brand is perceived by the marketplace to be weakened, end users/customers of printers may feel the brand is not as credible as it once was. If that becomes a perception, the end users will stop requesting it and therefore printers who are certified to meet their needs would no longer require FSC certification. If FSC Trademark use further diminishes, that, in my opinion, further lessens the brand impact and

	credibility in the marketplace. Proposed Change: 1.6 The organization shall have a trademark use management system in place to submit/manage all intended uses of FSC trademarks to its certification body for approval. Please see Annex B for further information on the trademark use management system. In Annex B remove clauses 2.1, 2.2, 2.3 in their entirety. The reason for this is to allow Group Certificate Managers to opt for trademark use submission to its certification body apart from exceptional or grandfathered cases. Annex A 1.1 The group entity (or manager, or central office) shall ensure that all uses of the FSC trademarks by the group entity or its individual members are approved by the certification body prior to use. (Remove “or that the group has opted to use the trademark use management system. When seeking approval by the certification body, group members shall submit all approvals via the group entity or central office and keep records of all approvals. Alternative submission methods may be approved by the certification body.”) The reason for this is that it would segue group members as well as third party certifiers to ask individual group entities to offer this service. Please see comments which substantiate this.
FSC Staff	‘Shall either have the trademark use management system in place or’ – consider revising to ‘shall either have an approved trademark use management system in place or’ Note: This is the first time that the trademark use management system is introduced in the standard. For such terms, which are later defined in the terms and definitions section, we have often suggested (such as during the CoC consultation) that they appear in bold or italics in order that the reader be given indication that they are later defined. We receive many enquiries from people who want certain terms defined in standards. Very often these terms are defined very well in the Terms and Definitions sections. Therefore this indicates that people are not reading them. If the terms were highlighted and this was explained at the start of the standard this would encourage people to refer to the section. Please consider doing this.
FSC Staff	Substitute the term "the organization shall either have THE trademark use management" by "have A trademark use management"
CH	This is a step in the right direction of making it slightly less onerous to use the FSC trademarks.

Clause 1.7	The products which are intended to be labelled with the FSC on-product label or promoted as FSC certified shall be included in the organization’s certificate scope and shall meet the eligibility requirements for labelling as stipulated by the respective FSC standard.
CB	“Shall be included in the organization’s certificate scope”. “Scope” is very general, PGL was more specific, easier to audit. Will we have to change the language in the certificate scope to include specific products? 1.7 Does this mean, for example, that an FSC Mix 60% product could not be described as “FSC certified” in a catalogue, because it does not meet the labeling threshold? It seems as though the requirement before only applied to labeling, not promotion of product. If so, this seems very restrictive, and harmful to availability of FSC products in the marketplace.
CB, Economic North	What does it mean that “products” which are intended to be labelled or promoted as FSC certified be included in the certificate “scope”? How specific does this need to be? Is this intended to have any impact on 20-001 requirements related to certificate scopes, or is this just a catch-all clause – stating the obvious so that there’s a standard reference to issue findings against in case a CH labels or

	promotes a product not included in their scope? If that later, that is helpful. Hopefully not intended to change certificate scope requirements.
FSC staff	Replace the term "respective" by "applicable".

*General comments related to this section 1:*

CB	Put item 1.4 just after item 1.1 to clarify. – To introduce promotional and on product labels and its objectives
M, Economic North	This section is clear and does not need wording changes.
CH	For group or multisites certificate it could be more efficient in term of traceability if each site own his unique license code
CH, Economic North	We support this section as written
CH, Economic North	Why so restrictive? What is the consequence if FSC Trademarks are used by non-certificate holders? Is FSC IC a certificate holder? No, so FSC IC cannot use the Trademarks any longer? IS FSC IC really asking retailers like Aldi, Walmart, Carrefour etc. to become certified to promote FSC products? This is not realistic and will lead to a stop of FSC Promotion. Proposal: everyone should be able to use to use the Trademarks in Promotion.
FSC Staff	I suggest strongly, that the use of FSC and the full name in text on social medias in status updates and such should be exempted from 1.3, 1.4 and 1.6. It does not make any sense to require that the use of these two trademarks in such "fast" medias should follow the same rules as use of trademark via "slow" communication channels and materials.
CH	We are valid certificate holder and there is no difficulty in logo approval
Consultant	In the table with countries "Forests For All Forever" in the Russian's label used font Arial. I suggest use a common font for all countries: e.g. <a href="http://aleksey.kurits.in/Forests_For_All_Forever_RUS.pdf">http://aleksey.kurits.in/Forests_For_All_Forever_RUS.pdf</a>

## 2. Restrictions on Using FSC Trademarks

Clause 2.1	The FSC trademarks shall not be used: (a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; (b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the company, outside the scope of certification; (c) to promote product quality aspects not covered by FSC certification; (d) in product brand names, company names, or website domain names; (e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and delivery documentation, in conformity with FSC chain of custody requirements.
CH	Clause 2.1 In general terms, an introductory section is missing. In fact, Forests For All Forever marks are presented here only as promotional material, but at least one labelling option is explicitly presented in Clause 5.5, and some others

	<p>are recalled, both as on-product (i.e. extra-logos and marks that come in addition to product labels) and off-product use (i.e. promotional panel or stand-alone Forests For All Forever marks). In the previous version of the standard, the distinction between on-product labelling and off-product promotional use was very clear, and it was also clear the possible use of extra-logos both on- and off-product if they come in addition respectively to labels or promotional panels. This is not the case for the new proposed draft: the distinction is not clear anymore. So, an introductory overview would be of great importance to clarify what is considered promotional and where promotion can be made; such an introduction should be placed either prior to Part II (so that Part II and Part III would be the “natural prosecution” of such an introduction), or at least in the standard Introduction. Clause 2.1 d) It could be worth reinstating the former Note, giving examples on how to use the FSC acronym when referring to one specific product. Other possibilities might be: “name – FSC®” or “name – FSC® cert.” or “name (FSC®)” because there is a number of situations where it could be not clear whether the acronym is used in a product brand name or not (e.g. catalogues, etc.). The doubt is whether it will be possible to refer to “paper FSC” (only as an example), or not. Clause 2.1 e) It should be clarified what is/is not allowed in terms of promotional use of FSC Trademarks (e.g. promotional panel highlighting the status of certified organization) in invoices listing FSC Controlled Wood claim(s).</p>
CB	<p>Clause 2.1 In general terms, an introductory section is missing. In fact, Forests For All Forever marks are presented here only as promotional material, but at least one labelling option is explicitly presented in Clause 5.5, and some others are recalled, both as on-product (i.e. extra-logos and marks that come in addition to product labels) and off-product use (i.e. promotional panel or stand-alone Forests For All Forever marks). In the previous version of the standard, the distinction between on-product labelling and off-product promotional use was very clear, and it was also clear the possible use of extra-logos both on- and off-product if they come in addition respectively to labels or promotional panels. This is not the case for the new proposed draft: the distinction is not clear anymore. So, an introductory overview would be of great importance to clarify what is considered promotional and where promotion can be made; such an introduction should be placed either prior to Part II (so that Part II and Part III would be the “natural prosecution” of such an introduction), or at least in the standard Introduction. Clause 2.1 d) It could be worth reinstating the former Note, giving examples on how to use the FSC acronym when referring to one specific product. Other possibilities might be: “name – FSC®” or “name – FSC® cert.” or “name (FSC®)” because there is a number of situations where it could be not clear whether the acronym is used in a product brand name or not (e.g. catalogues, etc.). The doubt is whether it will be possible to refer to “paper FSC” (only as an example), or not. Clause 2.1 e) It should be clarified what is/is not allowed in terms of promotional use of FSC Trademarks (e.g. promotional panel highlighting the status of certified organization) in invoices listing FSC Controlled Wood claim(s).</p>
CB	<p>2.1 e: Also CW clients need to use the trademarks for stakeholder consultations</p>
FSC Staff	<p>Clause 2.1 In general terms, an introductory section is missing. In fact, Forests For All Forever marks are presented here only as promotional material, but at least one labelling option is explicitly presented in Clause 5.5, and some others are recalled, both as on-product (i.e. extra-logos and marks that come in addition to product labels) and off-product use (i.e. promotional panel or stand-alone Forests For All Forever marks). In the previous version of the standard, the</p>

	<p>distinction between on-product labelling and off-product promotional use was very clear, and it was also clear the possible use of extra-logos both on- and off-product if they come in addition respectively to labels or promotional panels. This is not the case for the new proposed draft: the distinction is not clear anymore. So, an introductory overview would be of great importance to clarify what is considered promotional and where promotion can be made; such an introduction should be placed either prior to Part II (so that Part II and Part III would be the “natural prosecution” of such an introduction), or at least in the standard Introduction. Clause 2.1 d) It could be worth reinstating the former Note, giving examples on how to use the FSC acronym when referring to one specific product. Other possibilities might be: “name – FSC®” or “name – FSC® cert.” or “name (FSC®)” because there is a number of situations where it could be not clear whether the acronym is used in a product brand name or not (e.g. catalogues, etc.). The doubt is whether it will be possible to refer to “paper FSC” (only as an example), or not. Clause 2.1 e) It should be clarified what is/is not allowed in terms of promotional use of FSC Trademarks (e.g. promotional panel highlighting the status of certified organization) in invoices listing FSC Controlled Wood claim(s).</p>
FSC Staff	<p>Clause 2.1 In general terms, an introductory section is missing. In fact, Forests For All Forever marks are presented here only as promotional material, but at least one labelling option is explicitly presented in Clause 5.5, and some others are recalled, both as on-product (i.e. extra-logos and marks that come in addition to product labels) and off-product use (i.e. promotional panel or stand-alone Forests For All Forever marks). In the previous version of the standard, the distinction between on-product labelling and off-product promotional use was very clear, and it was also clear the possible use of extra-logos both on- and off-product if they come in addition respectively to labels or promotional panels. This is not the case for the new proposed draft: the distinction is not clear anymore. So, an introductory overview would be of great importance to clarify what is considered promotional and where promotion can be made; such an introduction should be placed either prior to Part II (so that Part II and Part III would be the “natural prosecution” of such an introduction), or at least in the standard Introduction. Clause 2.1 d) It could be worth reinstating the former Note, giving examples on how to use the FSC acronym when referring to one specific product. Other possibilities might be: “name – FSC®” or “name – FSC® cert.” or “name (FSC®)” because there is a number of situations where it could be not clear whether the acronym is used in a product brand name or not (e.g. catalogues, etc.). The doubt is whether it will be possible to refer to “paper FSC” (only as an example), or not. Clause 2.1 e) It should be clarified what is/is not allowed in terms of promotional use of FSC Trademarks (e.g. promotional panel highlighting the status of certified organization) in invoices listing FSC Controlled Wood claim(s).</p>
FSC Staff	<p>2.1 d) Please give an example here of FSC used in a product brand name, as per V2-1, for clarity.</p>
CB, Economic North	<p>In 2.1 (d), FSC trademarks shall not be used in product brand names. In the previous version of the standard, CHs may use "FSC" by getting special approval from CBs. Now no such approval should be given? What happens to those who already use "FSC" in their product brand names?</p>
M, Economic North	<p>The current wording would prohibit the use of FSC trademarks in product brand names, company names or website domain names. This kind of FSC trademark use has been possible with the authorization of FSC IC. This should be possible also in the future. Addition (underlined): The FSC trademarks shall not be used:</p>

	d) in product brand names, company names or website domain names, unless approved by FSC IC.
CH, Economic North	2.1d) Comment: The current wording would prohibit the use of FSC trademark in product brand names, company names or website domain names. This kind of FSC trademark use has been possible with the authorization of FSC IC. This should be possible also in the future. Proposed change: Addition to the text: The FSC trademarks shall not be used: d) in product brand names, company names or website domain names, unless approved by FSC IC.
CB, Economic North	In regards to 2.1, (e), it may be helpful to include a reference that distinguishing marks for identification are allowed on product between operations and for further processing.
CB	2.1 (d) the way it is currently stated & represented within the crosswalk document it is unclear if it is permissible for companies to list products as FSC(R) certified Maple Lumber on their website or in product listings. If the intention is to remove this allowance I would suggest an alternative example is provided so companies clearly understand how they can denote certified products within their product listings (website, catalogs, etc.) Another option may also be to define "product brand name" or "brand name" in the definitions. 2.1(e) Consider allowing companies to use FSC CW language in meeting their sourcing policy commitments & CSR reporting as this has become an important tool in doing so.

Clause 2.2	<p>The name 'Forest Stewardship Council' shall not be replaced with a translation. A translation may be included in brackets after the name:  Forest Stewardship Council® (translation)</p> <p>Note 2. Compliance with the requirements  FSC reserves the right to suspend or terminate permission to use the FSC trademarks if the organization is failing to comply with the FSC trademark requirements as set out in this standard. The interpretation of these rules is at the sole discretion of FSC.</p>
CH	Clause 2.2 - Note 2 If placed in such a position, this Note appears as in direct connection to Clause 2.2; rather that, the Note should be clearly distinguished from the previous Clause. Maybe, it could be also considered the possibility to raise it to the Clause status, instead of considering it just a Note. Please, consider the opportunity of giving Notes the same format as they have in other standards, instead of the specific format presented here.
CB	Note 2 If placed in such a position, this Note appears as in direct connection to Clause 2.2; rather that, the Note should be clearly distinguished from the previous Clause. Maybe, it could be also considered the possibility to raise it to the Clause status, instead of considering it just a Note. Please, consider the opportunity of giving Notes the same format as they have in other standards, instead of the specific format presented here.
CB	Note 2: Why is this a note a not a separate clause? It comes under a clause about translation but is nothing to do with translations.
CB, Economic North	2.2 What will happen with this note? If it will be in the standard, suggest reference to the TLA.
FSC Staff	Note 2 If placed in such a position, this Note appears as in direct connection to Clause 2.2; rather that, the Note should be clearly distinguished from the previous Clause. Maybe, it could be also considered the possibility to raise it to the Clause status, instead of considering it just a Note. Please, consider the

	opportunity of giving Notes the same format as they have in other standards, instead of the specific format presented here.
FSC Staff	Note 2 If placed in such a position, this Note appears as in direct connection to Clause 2.2; rather that, the Note should be clearly distinguished from the previous Clause. Maybe, it could be also considered the possibility to raise it to the Clause status, instead of considering it just a Note. Please, consider the opportunity of giving Notes the same format as they have in other standards, instead of the specific format presented here.
FSC Staff	2.2 Should this also say that 'FSC' cannot be translated also i.e. into other alphabets?

*General comments related to this section 2:*

Member, Social North	These core restrictions are critical. We must protect our brand integrity and ensure companies aren't using the FSC logo to misrepresent their products or create confusion. I am open to text revisions the environmental chamber would like to see to allow greater clarity around FSC 100% vs blended products that allow controlled wood.
Consultant	General notes about language - in some instances you use FSC certified, in others FSC-certified. It would be nice to have one way to write it, as some CBs actually ask CHs not to use the hyphen in trademark materials. Also, note about the 'controlled' language. In regards to trademark use, it used to be suggested by FSC to state 'FSC virgin fibers and controlled material' but a few years back Trademark Managers received guidance that it was no longer acceptable to use 'controlled sources' and were instructed to use 'from well managed forests and other responsible sources.' Using the controlled language is going to cause more confusion especially in the printing sector.
CH, Economic North	We support this section as written.

### 3. Selecting the FSC Label

Clause 3.1	In order to make an on-product claim, the organization shall select the correct FSC label on the basis of the FSC claim. Text claims may be made only in addition to an on-product label.
CH	Maybe this Clause could be split in two different parts.
CB	Maybe this Clause could be split in two different parts.
FSC Staff	Maybe this Clause could be split in two different parts.
FSC Staff	Maybe this Clause could be split in two different parts.
CB	Add ' on a product' between text claims.... may be made only
FSC Staff	Great! Thank you very much for including this clause!! It has pleased us greatly!
CB, Economic North	3.1 states "Text claims may be made only in addition to an on-product label.". I suggest adding a sample for that as it may not be directly clear to the reader what that means in practice.



Clause 3.2	The labels corresponding to the claims categories shall be: [Image]
CB	Put 3.2 in the Standard introduction.
FSC Staff	Great! This table wasn't apparent in the draft standard available online (therefore there may be a formatting issue here?). We were going to suggest this should be a table so are pleased!
CB	I do not like this option, I would prefer the normal claim with an extra statement outside the log.
FSC Staff	SCL0 - FSC Recycled is not available - why? There can't be options that some recycled stuff is coming from smallholder group forests? If not existing now - can come later.

Clause 3.3	The FSC on-product label elements are: [Image]
CH	The “non-compulsory elements” should be considered as such only if recommended label dimensions are not met, i.e. FSC website and label text should be compulsory and always used when label size equal or exceed recommended dimensions (see Clause 8.5).
CB	The “non-compulsory elements” should be considered as such only if recommended label dimensions are not met, i.e. FSC website and label text should be compulsory and always used when label size equal or exceed recommended dimensions (see Clause 8.5).
FSC Staff	The “non-compulsory elements” should be considered as such only if recommended label dimensions are not met, i.e. FSC website and label text should be compulsory and always used when label size equal or exceed recommended dimensions (see Clause 8.5).
FSC Staff	The “non-compulsory elements” should be considered as such only if recommended label dimensions are not met, i.e. FSC website and label text should be compulsory and always used when label size equal or exceed recommended dimensions (see Clause 8.5).
CB	Instead of using an asterisk against compulsory elements, it would be better to asterisk those that are optional. Or indeed write (optional) after the element text. E.g. Label text (optional) Be consistent between FSC Logo and FSC checkmark and tree logo. 1.1c uses one form but 3.3 uses another.
FSC Staff	Please provide an example of a label title 'e.g. FSC Mix', a product type and a label text. This will help with CH understanding of these. Also, it would be more effective here for the graphic to show the minimum compulsory requirements and for the optional to be shown as such (not the other way round which is currently shown). For completeness perhaps it would be effective to show 1) graphic showing minimum compulsory 2) graphic showing compulsory + optional. Note that website address is currently shown as optional. Should reference 3.5 here to show that it might not be depending on country.
Consultant	Visualization of the FSC label: description of all compulsory elements of the FSC label could be placed on the right side of the label. The other elements should be placed on the left side of the label. It helps to organize and explain the elements in simpler way. NOTE: the frame of FSC label should be marked as an optional element.

Clause 3.4	Only the FSC label artwork provided by the label generator or otherwise issued and approved by the certification body or FSC shall be used. Access to the label generator is arranged by the organization’s certification body.
CH	What does it mean “or otherwise issued”? Is that a reference to special approvals, or what else?
CB	What does it mean “or otherwise issued”? Is that a reference to special approvals, or what else?
FSC Staff	What does it mean “or otherwise issued”? Is that a reference to special approvals, or what else?
FSC Staff	What does it mean “or otherwise issued”? Is that a reference to special approvals, or what else?
CB	Guidance only. Maybe replace it under as note?
CH	The label should be as standardized as possible to avoid making the use of the label more complicated than it already is. At the moment there are 8 different versions of each label which in some printing companies are used in many different languages for different product types. If optional elements are introduced it will result in an extreme number of labels to be administrated in the companies. This will for sure increase the administrative burdens and increase the risk of incorrect labelling. If the label elements are not all mandatory it should be FSC which defines what to be included for the specific country and not the users.
CB	What about the trademark management system?

Clause 3.5	Organizations are responsible for compliance with national labelling requirements and consumer protection laws in those countries in which products are promoted, distributed, and sold.
CH	Clause 3.5 should be also expanded, explicitly stressing that compliance with national labelling includes possible adoption of non-compulsory elements.
CB	Clause 3.5 should be also expanded, explicitly stressing that compliance with national labelling includes possible adoption of non-compulsory elements.
FSC Staff	Clause 3.5 should be also expanded, explicitly stressing that compliance with national labelling includes possible adoption of non-compulsory elements.
FSC Staff	Clause 3.5 should be also expanded, explicitly stressing that compliance with national labelling includes possible adoption of non-compulsory elements.
CB	Organizations are responsible - make this clear to ASI that it is not CBs who are responsible for compliance with national laws.
M, Economic South	Clauses 3.5 and 5.6 are overlapping.
FSC Staff	Guidance should be provided by FSC and available through the trademark portal, similar to the trademark registration information. Change clause to read: Organizations are responsible for compliance with national labelling requirements and consumer protection laws in those countries in which products are promoted, distributed, and sold. Guidance on requirements by country is available in the FSC trademark portal.

CB, Economic North	I would like it to be made clear, perhaps in an intent document accompanying the final standard, or in the 20-001 standard that CBs are not obliged to audit CH compliance with national labeling requirements and consumer protection laws.
CH, Economic South	Clause 3.5 and 5.6 are overlapping.
FSC Staff	This clause is not needed because every companies basically have to meet their local labeling requirements and FSC don't have to require it. Instead of this clause I suggest to add a note that users decide which elements are required in addition to the minimum elements based on national requirements to clause 3.4.
Consultant, Economic North	Because of the decision of German BGH I ZR 26/15 I propose that you will give guidance for German CH to facilitate decision whether to include the FSC website address as this piece of law may not be common knowledge yet.
FSC Staff	Specify that we are referring to FSC certified products and not to any products of an organization: .... in which FSC-certified products are promoted / or, in which FSC products are promoted.
CB	This will mean that the CBs will have to take the responsibility as they need to approve the logos. CH like to make the CBs responsible for everything.

Clause 3.6	<p>The product type shall be specified unless all the materials of the product and its packaging/content are FSC certified (see 4.1). Certified material may be specified either by using product type within the label or by additional text next to it. There are two cases where specific rules apply:</p> <p>(a) Product type shall always be specified on FSC-certified printed publications.</p> <p>(b) Where FSC-certified products contain neutral materials that cannot be distinguished from FSC-certified ingredients (e.g. uncertified neutral materials such as cotton fibre used in FSC-certified paper), the FSC-certified ingredient shall be clearly specified (e.g. 'wood' instead of 'paper' or 'packaging').</p> <p>Note for stakeholders: Clause 3.6(b) is based on FSC Board decision made in February 2017 on clarifying misleading labelling of products containing neutral materials.</p>
CB	3.6b This will work as long as the FSC certified ingredient is included in the product type menu options in the logo generator.
CH	SPECIFYING PRODUCT TYPE Point 3.6 - letter b) The draft of standard reports: "Where FSC-certified products contain neutral materials that cannot be distinguished from FSC-certified ingredients (e.g. uncertified neutral materials such as cotton fibre use in FSC-certified paper ) the FSC-certified ingredient shall be clearly specified (e.g. "wood" instead of "paper" or "packaging") So, by my opinion, this indication could deeply mislead the consumer/ end user. Indeed, in fact he will have in hand a sheet of paper, but according to this classification, he would get information that he is handling an article basically made by "wood". This is clearly deceptive. For example , we produce a little of papers containing annual fibers such cotton or others, on the basis of different percentages in the pulp mixture, but substantially is paper for all purposes ( printing ,packaging, labelling and so on )
CH	Clause 3.6 b) Instead of a generic indication ("wood" in case of paper does not add clarity at all), it would be better specifying the product type at a higher level of detail than usual writing, e.g. "wood fibre" or "cellulose". Possibly, an additional text should be preferred/required. It would be worth adding a Note with some examples, as in the cause of Clause 2.2 in the old (current) version FSC-STD-50-001 V1-2. It would be worth explicating in a graphical way what

	does it mean that “certified material may be specified [...] using additional text next to it”, e.g. referring to the same graphical approach adopted in Clause 5.1 (b).
CB	Clause 3.6 b) Instead of a generic indication (“wood” in case of paper does not add clarity at all), it would be better specifying the product type at a higher level of detail than usual writing, e.g. “wood fibre” or “cellulose”. Possibly, an additional text should be preferred/required. It would be worth adding a Note with some examples, as in the cause of Clause 2.2 in the old (current) version FSC-STD-50-001 V1-2. It would be worth explicating in a graphical way what does it mean that “certified material may be specified [...] using additional text next to it”, e.g. referring to the same graphical approach adopted in Clause 5.1 (b).
FSC Staff	Clause 3.6 b) Instead of a generic indication (“wood” in case of paper does not add clarity at all), it would be better specifying the product type at a higher level of detail than usual writing, e.g. “wood fibre” or “cellulose”. Possibly, an additional text should be preferred/required. It would be worth adding a Note with some examples, as in the cause of Clause 2.2 in the old (current) version FSC-STD-50-001 V1-2. It would be worth explicating in a graphical way what does it mean that “certified material may be specified [...] using additional text next to it”, e.g. referring to the same graphical approach adopted in Clause 5.1 (b).
FSC Staff	Clause 3.6 b) Instead of a generic indication (“wood” in case of paper does not add clarity at all), it would be better specifying the product type at a higher level of detail than usual writing, e.g. “wood fibre” or “cellulose”. Possibly, an additional text should be preferred/required. It would be worth adding a Note with some examples, as in the cause of Clause 2.2 in the old (current) version FSC-STD-50-001 V1-2. It would be worth explicating in a graphical way what does it mean that “certified material may be specified [...] using additional text next to it”, e.g. referring to the same graphical approach adopted in Clause 5.1 (b).
CB	Change text to ... materials of the product and its contents and/or packaging are 3.6 a; Publications is not the right word. Suggest using printed items (e.g. Christmas card is printed but is not a publication) 3.6b How will an approver know which is the appropriate product type. Approvers are not always COC Auditors. Also, it seems more misleading to put Wood as a product type on a paper product (just to distinguish from the cotton fibre). The product type should describe the material that is FSC certified so in the example given, perhaps a new product type is needed 'Wood Fibre'.
FSC Staff	3.6.b – This clause is too vague. Neutral materials, while defined in the Chain of Custody standard, could be misinterpreted. The term is not used beyond a definition in the CoC standard so it is unclear how it will be applied in practice. For example, are the water and clay components of a pulp-based paper be considered neutral materials?
CB	Put an introduction before, specifying the promotional and on product labels, the availability of the labels on Trademark Portal, and connecting with product groups definition. TO include more examples Mobius loop - to include a clarification regarding the specification of this type of label(only some recycled products can use)
FSC Staff	Please give more examples here and specific complicated ones - such as NTFP's in certified packaging and uncertified packaging. This was used in 40-004 V3 very effectively for product groups. See new table in new CoC standard. Consider expanding this clause to accommodate many examples. This is much

	<p>misunderstood clause and results in incorrect labelling. Expanding this and explaining through many examples could really help here. Also consider omitting 'unless' in this statement and turning this into a positive rather than a prohibitive clause - again, we want to encourage people to label their products as FSC rather than making it seem very off-putting. It would also be useful to introduce a clause here highlighting the need to use 2 labels when referring to two separate product types. Should this clause also reference 'permanent parts' see comment 4.1 below 3.6 a) printed publications - can we define this. It is commonly understood that this refers to P7 from 40-004a 'Printed Materials' - if this is not the case then Printed Publications should be defined here for clarity. 'Publications' is generally defined as books, manuals or journals, is that what is meant here? Generally we feel that this entire clause has become unwieldy, over complicated and somewhat negative in its delivery. We would suggest that the working group go 'back-to-basics' with this entire clause and try to remember what, essentially it is trying to achieve then work this up from there. We feel it could achieve its remit in a much simpler, more positive way.</p>
Consultant	<p>You should require the product type to always be used. Some CBs are interpreting this incorrectly, and it's difficult when a CH transfers CBs and gets different guidance. Eliminating ANY confusion would be best for FSC, CBs, and CHs. Otherwise, the language should be clearer than it currently is.</p>
CB Economic North	<p>In 3.6 (b), "wood" should be used instead of "paper" or "packaging". In that case, how do consumer distinguish if the label is used to indicate the outside package is certified or what's inside (e.g. tissue papers or copy papers) is certified? There is no way of telling if you don't use "paper" or "packaging" in such cases.</p>
M, Economic North	<p>3.6 b) Clarification is needed on whether this requirement and its term uncertified neutral materials cover only other fibre types or also other materials than fibre? Metsä Group stresses the importance of being able to label paper as FSC paper under the new Trademark standard. Therefore the requirement should be limited to fibre only so that other ingredients needed in paper making process (such as materials to increase paper's strength) would not prohibit paper makers to label their products as FSC paper.</p>
CH, Economic North	<p>3.6 b) Clarification is needed on whether this requirement and its term uncertified neutral materials cover only other fibre types or also other materials than fibre? UPM stresses the importance of being able to label paper as FSC paper under the new Trademark standard. Therefore the requirement should be limited to fibre only so that other ingredients needed in paper making process (such materials to increase paper's strength) would not prohibit paper makers to label their product as FSC paper.</p>
CB, Economic North	<p>In 3.6, (b), it states "(e.g. 'wood' instead of . . .). Doesn't it to state " . . 'paper' instead of . . . ". If cotton fibre is used with paper, where does the wood come from? 3.6, if I am not mistaken, would still require a table that has metal legs to state "wood" as product type. That, however, would be not necessary since everybody who read the label would know that only the wood came from responsible sources. So, in those instances a product type should not be necessary in my humble opinion.</p>
FSC Staff	<p>[Clause 3.6]The product type shall be specified unless all the materials of the product and its packaging/content are not only FSC certified but also carrying same label title.</p>
Consultant	<p>Clause 3.6 (b): The example given at the very end of the sentence makes me confused. If a term "wood" is specified on something looks so much like paper, it is very confusing and misleading. In this case, additional text should be used to clarify that the neutral material is not covered by FSC certification.</p>

Consultant, Economic North	3.6 for products made of different FSC certified materials, but without FSC certified packaging, a product type like "contents" would be very helpful. The proposal to describe the FSC content with additional text might not be optional for products where there is limited space for descriptions or which need to be described in various languages, so that additional text beside the label would have to be translated, too. In most of the product cases there would not be enough space for that.
Consultant	Ref. 3.6 - 'additional text' expression – may confuse not very experienced CB/CH. "Additional text with the product type next to it" would be more straightforward / no doubts. 3.6.b - the text in the frame seems to be not necessary for the standard. The less text the better/simpler.
CH	Can you please provide graphical examples of labels that include neutral materials either at this section in the standard or as a separate guidance document?
CB	Will it be possible to use two logos on a product where both the packing and product is certified? I would say yes, but it seems here that only one label should be used.

Clause 3.7	Specific product names shall not be used as product types. A list of product types (e.g. 'paper', 'wood') is provided in the label generator. These are intended as broad categories. The list is not exhaustive and organizations shall contact FSC via the certification body with any request for a new product type, e.g. for a non-timber forest product, to be added.
CB	It would be great if you could include a couple of examples of "product name" vs product type.
CB	3.7 - A NC raised here seems to be also a NC raised against 3.4 sharing the same root cause failure. Can't be merged in to one requirement?
CB, Economic North	Is there a procedure or defined timeline for FSC to respond to these requests?
CB	It would be good, if the CH have the Opportunity to choose "Content" as the Product Type. So they can Label the packaging of a product and it is clear that the Content is FSC certified.
FSC Staff	How long will take this procedure to add a new product type into label? Can it be e.g. listed in FM or CoC local Standards?

Clause 3.9	The Moebius loop shall not be used without a percentage figure. The figure shall reflect the sum of post- and pre-consumer reclaimed material content, which can be substantiated through FSC chain of custody controls.
CB	Change the language from "The figure SHALL" to "The figure SHOULD". Since FSC CoC certificate holders may classify pre-consumer reclaimed paper materials as equivalent to FSC certified and post-consumer reclaimed, this seems unnecessary for paper materials.
CH	The figure in the Moebius loop should reflect not only the post- and pre-consumer reclaim material content, but also the FSC Recycled content. In this way, the adoption of the Moebius loop would be supported (nowadays it is very rare).

CB	The figure in the Moebius loop should reflect not only the post- and pre-consumer reclaim material content, but also the FSC Recycled content. In this way, the adoption of the Moebius loop would be supported (nowadays it is very rare).
FSC Staff	The figure in the Moebius loop should reflect not only the post- and pre-consumer reclaim material content, but also the FSC Recycled content. In this way, the adoption of the Moebius loop would be supported (nowadays it is very rare).
FSC Staff	The figure in the Moebius loop should reflect not only the post- and pre-consumer reclaim material content, but also the FSC Recycled content. In this way, the adoption of the Moebius loop would be supported (nowadays it is very rare).
CB	I recommend you speak to the COC Team about this. for paper reclaimed material this is fine but pre-consumer wood material is not considered as recycled and it must be controlled as FSC certified or against the CW STD.

*General comments related to this section 3:*

M, Social North	I propose we signal to businesses that in 2020 FSC logo text will change to change the MIX label text from "from responsible sources" to "Your purchase supports forest stewardship" this text gets away from implying a physical connection between the wood in the product being purchased and the well managed forest. Controlled Wood is not intended to be a brand and we don't need to state that Controlled Wood is a responsible source. We simply need to tell the truth which is the purchase directly supported a well managed forest via the credit system. I am sympathetic to the cost for businesses to implement a logo change. Many companies will be angry. However, delaying the start date to 2020 and giving businesses time to plan for it and giving assurance of what they can expect down the road 13 years shows we have done what we can to mitigate the "cost" and provide a business environment of stability.
CH, Economic North	Please Keep it simple. No end consumer understand Mix, 100%, small community Producers. One for all would be best. At least drop the small community Producers Label
M, Environmental North	A large number of environmental and social chamber members believe that the FSC Mix label text -- "From Responsible Sources" -- is deceptive and needs to change. The wording should be accurate and should be evaluated possible against the tests in the U.S. Federal Trade Commission's (FTC) green guidelines (see <a href="https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-issues-revised-green-guides/greenguides.pdf">https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-issues-revised-green-guides/greenguides.pdf</a> ) as well as edition 12 of the CAP Code (UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing. CAP is the Committee of Advertising Practice, the self-regulatory body that creates, revises and enforces the Code (see <a href="https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html">https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html</a> ).
M, Social North	I agree with allowing flexibility in trademark element use. Larger companies with graphic teams are more likely to use the check tree logo without the full text. The proposed flexibility will allow them to use the logo in ways that improve the beauty of their materials.

## 4. Labelling Requirements

Clause 4.1	The label shall be used only where all timber-based parts of the product are covered by FSC certification. Packaging made of timber-based materials is considered a separate element. Therefore, the label may refer to the packaging, the product inside, or both, depending on which elements are certified.
CH	This Clause seems in contrast with FSC-STD-40-004 V3-0 provisions: 1) FSC-STD-40-004 V3-0 (see Box 2) states that “ALL forest-based components that have a functional purpose in the product shall conform to CoC control requirements”. This is in contrast with the provision in draft FSC-STD-50-001 V2-0 stating that “The label shall be used only where ALL TIMBER-BASED PARTS of the product are covered by FSC certification”. 2) FSC-STD-40-004 V3-0 (see Box 2) states that “Packaging that is made FROM FOREST-BASED INPUTS (e.g. PAPER OR WOOD) is considered a separate element from the product inside”. This is in contrast with the provision in draft FSC-STD-50-001 V2-0 stating that “Packaging MADE OF TIMBER-BASED MATERIALS is considered a separate element”. Therefore, it should be either aligned the wording (forest- VS. timber-based inputs VS. materials), and aligned the content (all functional VS. all, and paper or wood VS. only timber). The following statements should be presented as a single Note under the main clause, rather than being presented in the main requirement: “Packaging made of timber-based materials is considered a separate element. Therefore, the label may refer to the packaging, the product inside, or both, depending on which elements are certified”.
CB	This Clause seems in contrast with FSC-STD-40-004 V3-0 provisions: 1) FSC-STD-40-004 V3-0 (see Box 2) states that “ALL forest-based components that have a functional purpose in the product shall conform to CoC control requirements”. This is in contrast with the provision in draft FSC-STD-50-001 V2-0 stating that “The label shall be used only where ALL TIMBER-BASED PARTS of the product are covered by FSC certification”. 2) FSC-STD-40-004 V3-0 (see Box 2) states that “Packaging that is made FROM FOREST-BASED INPUTS (e.g. PAPER OR WOOD) is considered a separate element from the product inside”. This is in contrast with the provision in draft FSC-STD-50-001 V2-0 stating that “Packaging MADE OF TIMBER-BASED MATERIALS is considered a separate element”. Therefore, it should be either aligned the wording (forest- VS. timber-based inputs VS. materials), and aligned the content (all functional VS. all, and paper or wood VS. only timber). The following statements should be presented as a single Note under the main clause, rather than being presented in the main requirement: “Packaging made of timber-based materials is considered a separate element. Therefore, the label may refer to the packaging, the product inside, or both, depending on which elements are certified”.
FSC Staff	This Clause seems in contrast with FSC-STD-40-004 V3-0 provisions: 1) FSC-STD-40-004 V3-0 (see Box 2) states that “ALL forest-based components that have a functional purpose in the product shall conform to CoC control requirements”. This is in contrast with the provision in draft FSC-STD-50-001 V2-0 stating that “The label shall be used only where ALL TIMBER-BASED PARTS of the product are covered by FSC certification”. 2) FSC-STD-40-004 V3-0 (see Box 2) states that “Packaging that is made FROM FOREST-BASED INPUTS (e.g. PAPER OR WOOD) is considered a separate element from the product inside”. This is in contrast with the provision in draft FSC-STD-50-001 V2-0 stating that “Packaging MADE OF TIMBER-BASED MATERIALS is considered a separate element”. Therefore, it should be either aligned the wording (forest- VS. timber-based inputs VS. materials), and aligned the content (all functional VS. all, and paper or wood VS. only timber). The following statements should be



	presented as a single Note under the main clause, rather than being presented in the main requirement: “Packaging made of timber-based materials is considered a separate element. Therefore, the label may refer to the packaging, the product inside, or both, depending on which elements are certified”.
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CB	Suggest splitting second sentence (Packaging made of timber...) is a separate clause as this separate to the first sentence. Element is a confusing use of the word here; (parts of the label are called elements and the product itself may be made up of various elements). How about using product instead. Better still use timber-based materials is considered a separate product in its own right. In the third sentence 'or both' - Isn't it important to know if the label refers to the contents and packaging (rather than one or the other)?
FSC Staff	It would be more consistent if this clause could mirror the statement made in 40-004 regarding permanent parts of the product or more fully from FSC-DIR-40-0004 'All components of a product which are made of or contain material originating from forests that are incorporated into the product to fulfil its function for the consumers' specific need shall be certified' in order for the FSC label to be applied. Given the nature of some of the anomalous examples given in FSC-DIR-40-004, such as toilet roll inners - it would be good to expand this section to show examples. Also consider mentioning NTFP's here.
FSC Staff	4.1 This clause contradicts the ADVICE-40-004-06 and Box 2 of FSC-STD-40-004 V3-0. The advice note explains that when a product contain wood and paper components, they can be certified independently. Also the CoC program is considering expanding this option to products that contain wood and NTFPs (e.g. a chair that has rattan and wood, but only the wood is certified). A second comment is that this clause only refers to timber-based parts and does not consider other non-timber forest products. Please align this clause with the CoC program before preparing the final draft for the board approval.
Consultant	Ref. 4.1 - does it refer to all timber-based parts of the product or to all forest-based parts of the product? Ref. Note 3: What about adding the expression 'other organizations e.g. retailers... or Non-certificate holders e.g. retailers...? What about e.g. the brand owners?
FSC Staff	4.1 / "the label may refer to the packaging, the product inside, or both, depending on which elements are certified" : Good, as long as it's clearly identified which part of the product is certified

CB	So two labels can be used on the packing of a certified product if the packing is also certified.
FSC Staff	All timber-based parts what about non-timber based parts which are certified? Rubber tire, NTFP's, textile (piece of cloth packed in FSC pack) etc. - need to be added all timber and non-timber based parts....
Clause 4.2	The FSC label should be clearly visible on the product, its packaging, or both. Note 3. Visible labelling enables promotion Retailers can promote products as FSC certified only if the label is visible to consumers.
CB	Please clarify: Would all retailers who promote a product as certified then have to label it?
CH	The meaning of “clearly visible” should be clarified, hopefully with examples. It’s not clear whether the concept of “clearly visible” presented in this Clause equals to that one stated in Clause 4.5, i.e. “visible to the consumer: accessible without damaging the sales packaging”. In the old (current) version of the standard FSC-STD-50-001V1-2, note/example under Clause 2.2 states that “Where the normal label placement for a product type is not on the side facing the consumer (such as a side panel or inside a book) an extra logo may be used in a more prominent place”. With reference to the proposed revision draft, in case that “clearly visible” does not correspond to “accessible without damaging the sales packaging”, then it should be still allowed to place labels in a non-clearly visible position if additional extra-logos/marks are used in a clearly visible position. Please, consider that “should” does not mean neither “shall” nor “recommended”: wording should be clarified/aligned.
CB	Clause 4.2.: I had the question the other day. Is it ok if the logo is on the bottom of the packing?
CH	The meaning of “clearly visible” should be clarified, hopefully with examples. It’s not clear whether the concept of “clearly visible” presented in this Clause equals to that one stated in Clause 4.5, i.e. “visible to the consumer: accessible without damaging the sales packaging”. In the old (current) version of the standard FSC-STD-50-001V1-2, note/example under Clause 2.2 states that “Where the normal label placement for a product type is not on the side facing the consumer (such as a side panel or inside a book) an extra logo may be used in a more prominent place”. With reference to the proposed revision draft, in case that “clearly visible” does not correspond to “accessible without damaging the sales packaging”, then it should be still allowed to place labels in a non-clearly visible position if additional extra-logos/marks are used in a clearly visible position. Please, consider that “should” does not mean neither “shall” nor “recommended”: wording should be clarified/aligned.
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	additional extra-logos/marks are used in a clearly visible position. Please, consider that “should” does not mean neither “shall” nor “recommended”: wording should be clarified/aligned.
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CB	Clearly visible label: e.g. Penguin books have the label on the imprint page and many magazines have their label on the editorial page - what if they are wrapped in cellophane - the consumer won't be able to see the imprint or editorial page. This makes approval of these labels impossible as approvers won't know what the packaging format will be.
M, Economic South	How is FSC expecting to deal with cases where legislation labelling requirements, e.g. medicines, does not allow the use of additional information in the external area of the packaging?
CB	4.2- confuse. The label use could be available inside packaging when the CH decide it’s better, or for law’s restriction (like pharmacy industry). This don’t stimulate the logo usage.
CH, Economic South	How is FSC expecting to deal with cases where legislation labelling requirements of medicines does not allow the use of additional information in the external area of the packaging?
CH, Economic North	4.2 logic issue. Unfortunately it is not required to label FSC products. But if labeled FSC requires visible labelling does not make sense. 4.2 should be deleted or redrafted with Note 3. If redrafted please define what visible means.
FSC Staff	[Clause 4.2 Note 3]Current STD-50-002 mentioned that "FSC certified products to be promoted shall carry the FSC on-product label. Exceptions to this rule shall be determined on a case-by-case basis by the FSC International." in clause 2.3. So we should add "Exceptions to this rule shall be determined on a case-by-case basis by the FSC International." also in here.
FSC Staff	4.2 : 'should': (=recommendation) does that actually make it possible to print the label inside the packaging? If so, that would be great news for luxury cosmetics that are ready to consider this option (and are not concerned by Note 3 as they don't want an open communication: ex Chanel!!)
FSC Staff	What does that mean for retailers? Big promo-actions? Posters? at some point it might be risk to loose TLA's...would delete Note 3

Clause 4.3	When a product is FSC labelled, marks of other forest certification schemes shall not be used on the same product. In catalogues, books, and similar FSC-labelled publications, other forest certification scheme marks may be used for promoting other products or for educational purposes.
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CB	If by “FSC-labelled publications” means promoting FSC certified products then it is ok. If not consider revise this sentence.
FSC Staff	This clause is missing ‘other non-forestry labels are acceptable. Presumably we want to allow the use of other non-forestry based labels i.e. provenance labels and not other forest management certification schemes? If we do, then we should specify this here.

Clause 4.4	The FSC logo with the licence code may be applied directly to the product (e.g. heat branded) only if an on-product label is used on the packaging or on a hang-tag or similar.
CB	add ‘alone’ between code and may i.e. licence code alone may be applied
FSC Staff	Clarification needed. If an additional FSC logo is added directly to the product, must the license code be included? Change clause to read: The FSC logo may be applied directly to the product (e.g. head branded) only if an on-product label is used on the packaging or on a hang-tag or similar.
FSC Staff	We would recommend a Note prior to 4.4 which states, in effect that FSC, in addition to the on-product label encourages CH’s to use additional FSC logos/Forest for All Forever marks on products to raise awareness. A positive statement to encourage this use. 4.4 Consider amending this to ‘FSC logo with the licence code alone...’

Clause 4.5	Additional FSC logos or reference to FSC may be used only when the on-product label is visible to the consumer (label is accessible without damaging the sales packaging). For example, if the on-product label is inside the sales packaging, no reference to FSC may be applied on outside the packaging.
CH	Clause 4.5 In the glossary, “FSC logo” is defined as “FSC checkmark-and-tree with initials ‘FSC”, whereas in this Clause the term “logo” seems to be applicable to the Forests For All Forever trademarks as well. It’s not clear if the concept of “visible to the consumer: accessible without damaging the sales packaging” presented in this Clause equals to that one stated in Clause 4.2, i.e. “clearly visible”. It’s not clear if the content in brackets (“label is accessible without damaging the sales packaging”) is to be considered an explanation (in this case, “i.e.” should be added) or an example (in this case, “e.g.” should be added). The meaning of “damaging” should be clarified, hopefully providing examples.
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	presented in this Clause equals to that one stated in Clause 4.2, i.e. “clearly visible”. It’s not clear if the content in brackets (“label is accessible without damaging the sales packaging”) is to be considered an explanation (in this case, “i.e.” should be added) or an example (in this case, “e.g.” should be added). The meaning of “damaging” should be clarified, hopefully providing examples.
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CB	Additional FSC Logo may only be used only when the on-product label is visible to the consumer. This means books in cellophane wrapping can’t have a label on the editorial page. The for example; refers to labelling the packaging but my point is about extra logos on the outside of books (as for Penguin). In any event, this for example, sentence isn’t clear.
M, Economic South	We do not see risks in make references to FSC in the packaging of FSC-certified products, if the product type of the FSC-certified product is described. This could be done by using promotional elements (5.1)
CB, Economic North	Unclear sentence: For example, if the on-product label is inside the sales packaging, no reference to FSC may be applied ON OUTSIDE (???) the packaging. Outside of? On the outside of?
FSC Staff	‘Additional FSC logos’ by logos do we also mean Forests for All Forever marks, again be consistent with names for these. This clause should be ‘flipped’ back to a negative proposition – cannot be promoted when the label is inside and not visible. Grammar ‘No reference to FSC may be applied on the outside of the packaging.’
CH, Economic South	We do not see risks in make references to FSC in the packaging of FSC-certified products, if the product type of the FSC-certified product is described. This could be done by using promotional elements (5.1)
Consultant	[Clause 4.5]: The example given here assumes that the packaging is non-transparent. However, there are many transparent packaging such as plastic cases which make is possible for consumers to see the labels inside without opening it. So the wording should be: if the on-product label is inside a non-transparent sales packaging.
Consultant, Economic North	4.5 please add: Additional FSC logos (Extra-Logos).... in order to make clear which additional Logo is meant here. ;
FSC Staff	Where is the risk showing an additional FSC logo or referring to FSC when the on-product label is not visible to the customer at first sight? When promoting FSC certified articles which carry an on-product label but their packaging does not, customers are also only able to check that the claim is correct when opening the packaging.
CB	Clause 4.5: is this in line with 4.2?

Clause 4.6	FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. These ‘segregation marks’ for internal
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	use should comply with this standard. It is not necessary to submit segregation marks to the certification body for approval. All segregation marks shall be removed before the products go to the final point of sale, or are delivered to uncertified organizations.
CB	It is not possible to expect segregation marks used for example in timber yards to comply with the FSC TM Standard in terms of size, color, inclusion of license code etc. Why is this necessary if they are removed before sale anyway?
CB	To exclude “certification body” The title “Using the FSC logo or any..”is confuse. Clarify the title and the requirements here. 4.6- What about distributor that sells labeled products. Do these label’s products need to be approved?
CB, Economic North	4.6 “It is not necessary to submit segregation marks to the certification body [or the organization’s trademark use management system] for approval.”
FSC Staff	If segregation marks have to comply with this standard when segregation marks would in effect be labels? This is confusing – segregation marks cannot have to comply with all elements of this standard, such as always needing to be accompanied by the licence code, as this is too onerous and goes over and above the function of a segregation mark.
CB, Economic South	The requirement under 4.6 that segregation marks must comply with the requirements of this standard is simply mindless, to put it mildly. Many of the CoC producers are simple low key operations that operate in a semi-formal environment. They proudly use signs simply painted "FSC" to separate certified from non-certified. If they are forced to use a formalized system, they will simply stop using anything at all. Immediately anyone exposed to their operations will no longer be immediately aware of the fact that FSC products are being produced there. Everyone loses. These signs are almost never attached to a product but would be an informal painted sign or a piece of paper affixed to a stack of products. There is zero risk of this being forwarded into the CoC. Most importantly, most of these operators will simply not understand why FSC insists on such formality and as a CB we will not be able to explain since it makes no sense at all.
FSC Staff	4.6 is too much to require. What are the risks or purpose that make us require them to apply this standard for temporarily use of our logo for internal purposes?
CB	So if the company is using a sign to identify the FSC storing area, it must include the (r) and the license code as a minimum?

Clause 4.7	If an organization wishes to label semi-finished products, the FSC label shall only be applied in a way that it can be removed before or during further processing.
CB	How to approvers check this? Semi-finished is a term that doesn’t mean much as a finished product for one company is not necessarily a finished product for another. This particularly relates to sheet materials and the important thing is that the real end product only shows the label of the last COC certificate holder. How about adding ‘or concealed’ after ‘in a way that can be removed.....
CB, Economic North	Make clear that “can be removed before or during further processing” means further down the supply chain, and not that the organization that is using the label on a semi-finished product has to remove it before they pass it on.

Clause 4.8	
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	<p>If two FSC-certified organizations enter into an agreement whereby the supplier labels products with the buyer’s FSC trademark licence code, the following conditions shall be met.</p> <p>(a) Products to be labelled shall be included in the certificate scope of both organizations.</p> <p>(b) Both parties shall inform their certification bodies in writing about the agreement. This information shall include the definition of the certification body or certificate holder that shall be responsible for approval of on-product labels.</p> <p>(c) The supplier is responsible for ensuring that the buyer’s code is used only on products that are supplied to that buyer.</p> <p>(d) Both organizations shall keep the contract easily available for auditing by the certification bodies.</p> <p>Note 4. Arrangements with uncertified organizations The product to be labelled may carry the branding of a retailer or brand owner that does not need to be certified.</p>
CH	<p>Clause 4.8 ADVICE-40-004-01 “FSC certified CoC contractors”, concerning Section 12 of FSC-STD-40-004 V2-0, specifies that the contracting organization shall maintain control and responsibility of the correct FSC label being applied and shall ensure that its license code is used in the FSC label also when FSC-certified contractors are used. It should be noted that the proposed Clause 4.8 in FSC-STD-50-001 V2-0 only considers labelling agreement between suppliers and buyers, and it does not specify any condition with reference to contractors, neither permissive nor restrictive. It would be worth specifying something on this issue. Note for stakeholders Option (a) is preferred in the first set of options. Option (a) is preferred in the second set of options. Other options could be considered as well, for example: - Please, consider the opportunity to make the use of OCP compulsory, in combination with option (a); - alignment of clauses in TMK contractual matters, e.g. long-term commitment toward TMK License Agreement under FSC-STD-50-002 and clear identification of the TSP “scope”.</p>
CB	<p>Clause 4.8 ADVICE-40-004-01 “FSC certified CoC contractors”, concerning Section 12 of FSC-STD-40-004 V2-0, specifies that the contracting organization shall maintain control and responsibility of the correct FSC label being applied and shall ensure that its license code is used in the FSC label also when FSC-certified contractors are used. It should be noted that the proposed Clause 4.8 in FSC-STD-50-001 V2-0 only considers labelling agreement between suppliers and buyers, and it does not specify any condition with reference to contractors, neither permissive nor restrictive. It would be worth specifying something on this issue. Note for stakeholders Option (a) is preferred in the first set of options. Option (a) is preferred in the second set of options. Other options could be considered as well, for example: - Please, consider the opportunity to make the use of OCP compulsory, in combination with option (a); - alignment of clauses in TMK contractual matters, e.g. long-term commitment toward TMK License Agreement under FSC-STD-50-002 and clear identification of the TSP “scope”.</p>
FSC Staff	<p>Clause 4.8 ADVICE-40-004-01 “FSC certified CoC contractors”, concerning Section 12 of FSC-STD-40-004 V2-0, specifies that the contracting organization shall maintain control and responsibility of the correct FSC label being applied and shall ensure that its license code is used in the FSC label also when FSC-certified contractors are used. It should be noted that the proposed Clause 4.8 in FSC-STD-50-001 V2-0 only considers labelling agreement between suppliers and buyers, and it does not specify any condition with reference to contractors, neither permissive nor restrictive. It would be worth specifying something on this issue. Note for stakeholders Option (a) is preferred in the first set of</p>

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FSC Staff	Clause 4.8 ADVICE-40-004-01 “FSC certified CoC contractors”, concerning Section 12 of FSC-STD-40-004 V2-0, specifies that the contracting organization shall maintain control and responsibility of the correct FSC label being applied and shall ensure that its license code is used in the FSC label also when FSC-certified contractors are used. It should be noted that the proposed Clause 4.8 in FSC-STD-50-001 V2-0 only considers labelling agreement between suppliers and buyers, and it does not specify any condition with reference to contractors, neither permissive nor restrictive. It would be worth specifying something on this issue. Note for stakeholders Option (a) is preferred in the first set of options. Option (a) is preferred in the second set of options. Other options could be considered as well, for example: - Please, consider the opportunity to make the use of OCP compulsory, in combination with option (a); - alignment of clauses in TMK contractual matters, e.g. long-term commitment toward TMK License Agreement under FSC-STD-50-002 and clear identification of the TSP “scope”.
CB	4.8d The word contract should be changed to agreement as Contract is a formal work in many cultures that will mean a lot of bureaucracy around signing, stamping, etc. Note 4: Unclear what this means. Can you provide an example?
M, Economic South	4.8 a: We do not see real advantages in auditing the same trademark use twice, in the supplier and buyer. This would imply in administrative burden and would overlap audit efforts. The products to be labelled under agreements should be included in the certificate scope of the CH responsible for approval of on-product labels. 4.8 d: Change the wording for “agreement”, instead of contract.
CB, Economic North	4.8.d: What about approvals?
CB, Economic North	4.8 d) what is the intent of “easily available” suggest remove easily as it is subjective and seems unnecessary.
CH	We fully support the suggestion about chapter 4.8 Labelling arrangements between organizations including Note 4. For our company and in general for promoting FSC even more, I think this is the right step going forward. Several bigger companies who want to combine their brand with FSC principles, this will help and simplify a lot. We support the option: (b) On-product labels could carry uncertified organization’s (brand owners, retailers, or any other organization that is not required to obtain certification) licence code instead of certificate holder’s when an adequate labelling agreement is in place. 4.8 (d) should be the safeguard to ensure all is in compliance.
FSC Staff	4.8 b) reword “This information shall identify the certification body or certificate holder that shall be responsible for the approval of on-product labels.’ C) ‘...ensuring that the buyer’s code is used only on products that are supplied to that buyer and are eligible for labelling.’ 4.8 Note 4 Suggest reinstating 4.6 from V2-1 here as it was a much clearer, very seldom misunderstood clause and Note 4 is not an improvement.
CH	There should be an exception for printing, when the buyer is creating 100% of the layout of the print and is sending ready-to-print files to the supplier. In this case the buyer has the absolute control and can check the label prior to the production and there are no risk that the label will be used by the supplier in a wrong way.



CH, Economic South	4.8 a: We do not see real advantages in auditing the same trademark use twice, in the supplier and buyer. This would imply in administrative burden and would overlap audit efforts. The products to be labelled under agreements should be included in the certificate scope of the CH responsible for approval of on-product labels. 4.8 d: Change the wording for “agreement”, instead of contract.
CH, Economic North	4.8 should be deleted. It adds complexity and reduces transparency thus weakens the FSC system
FSC Staff	The previous requirements mentioned that "The organizations are not required to be in a direct client relationship, but any other company in the intervening supply chain needs to hold an FSC chain of custody certificate." in clause 4.5 c). This is deleted now but we should mention how to deal this also in current requirements.
Consultant	The first sentence should end with ":" instead of ".". [Note 4]: The wording is not at all clear about the intention. It should be more specific and clear such as: The product to be labelled may carry the licence code of a retailer or brand owner that does not need to be certified and has made FSC trademark licence agreement with TSP. [Draft 1 clause 4.4]: "Where a publication is to be distributed both in print and online, the FSC on-product label should be removed from the online version." should be included again. During the webinar, I asked why this clause was removed from the latest draft and was explained that we cannot control non-certificate holders uploading such files on their website. However, the original online version file is almost always created by the CH (unless the client scans the printed material which is very unlikely). So by making recommendations to CHs, we can prevent online files carrying FSC label. [Draft 1 a box under 4.10]: "The organizations are not required to be in a direct client relationship, but any other company in the intervening supply chain needs to hold an FSC chain of custody certificate." should be included again. It is very important to clarify on this point.
Consultant, Economic North	4.8 b) please add: ...or certificate holder with Trademark approval management system that shall be responsible....
CH	Clause 4.8 - use by uncertified holders by FSC-STD-50-002 - I am not fully aware of how this system works or what the organizations need to do, my concern would be what would stop at uncertified organization from labelling all its products as FSC certified? When certified organizations have so many requirements, why do uncertified organizations get to use the FSC logo without requirements?
CB	I think I missed the option to comment on labelling arrangements. They need to be as simple as possible and clearly possible to be checked by approvers. Use of other license codes other than CH's own code should be restricted as much as possible.

*General comments related to this section 4:*

CH	Keep it simple : traceability is about products, not only the plants manufacturing the product could be certified, the label on the product must carry on the licence number of a certified company If you allow non certified suppliers to label the products with their licence code, I am afraid only very few people would understand the matter and it could be at risk for FSC reputation the argument about simplification could be applied to a lot of more important subjects in FSC standard, the other one about not disclosing supplier is very easy to solve in not labeling the product
CB	If it is still possible to use the Extra Label in Addition to the full Label, please define that in the Standard.

FSC Staff	There should be a requirement restricting the use of FSC label on PDFs that are published online.
FSC Staff	Please note that for those that responded there was a preference for option (a) labeling agreements only possible with certificate holders. However, the occasional retailer that responded was clearly in favor of option b. (could carry the uncertified organization's license code). However, please note that there was one CH ( a retailer) clearly in favor of this kind of labelling arrangement

## 5. Promotional Elements

Clause 5.1	Organizations may promote FSC-certified products and their status as an FSC certificate holder with FSC logo or 'Forest For All Forever' marks. When doing so, their licence code and product- or forest-related messaging shall be included. The use of FSC website address is recommended.
CB	Add more clarification regarding the required elements. It would be great if you could use the same format as in 3.3 which points to the elements and states what it is and whether or not it is required. 5.1 Is forests for all forever mandatory? Or can "the mark of responsible forestry" continue to be used? 5.1b Provide more information regarding 5.1(b). Will this option be downloadable from the FSC Generator site? Including the text below the logo?
CH	Clause 5.1 In general terms, an introductory section is missing. In fact, Forests For All Forever marks are presented here only as promotional material, but at least one labelling option is explicitly presented in Clause 5.5, and some others are recalled as well, both as on-product (i.e. extra-logos and marks that come in addition to product labels) and off-product use (i.e. promotional panel or stand-alone Forests For All Forever marks). In the previous version of the standard, the distinction between on-product labelling and off-product promotional use was very clear, and it was also clear the possible use of extra (additional) logos both on- and off- product if they come together respectively labels or promotional panels. This is not the case for the new proposed draft: the distinction is not clear anymore. So, an introductory overview would be of great importance to clarify what is considered promotional and where promotion can be made; such an introduction should be placed either prior to Part II (so that Part II and Part III would be the "natural prosecution" of such an introduction), or at least in the standard Introduction. It would add much clarity to the contents if two sub-sections were presented, the first one focusing on on-product use of promotional elements (see, for example, Clause 5.5), and the second sub-section focusing on the off-product use of promotional elements. Terms like "recommended" or "preferred" should be avoided in such a context. In the old (current) version of the standard, the term "recommended" was adopted, for example, with reference to the label colour...and it's well known that often such a recommendation has not been followed at all. It would be worth adopting the same graphical approach in presenting which elements can be possibly omitted: refer to Clause 3.3 In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels/artworks, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks. Moreover, in case of doubts, users might decide not to use the trademarks. Clause 5.1 a) It's not clear whether the text "Forests For All Forever" is the only possible

	<p>textual choice to be put under the “conventional” promotional panel. It would be worth maintaining the current text “The mark of responsible forestry” as well. Clause 5.1 b) It would add much clarity to the contents if two sub-sections were presented, the first one focusing on on-product use of promotional elements (see, for example, Clause 5.5), and the second sub-section focusing on the off-product use of promotional elements.</p>
CB	<p>Clause 5.1 In general terms, an introductory section is missing. In fact, Forests For All Forever marks are presented here only as promotional material, but at least one labelling option is explicitly presented in Clause 5.5, and some others are recalled as well, both as on-product (i.e. extra-logos and marks that come in addition to product labels) and off-product use (i.e. promotional panel or stand-alone Forests For All Forever marks). In the previous version of the standard, the distinction between on-product labelling and off-product promotional use was very clear, and it was also clear the possible use of extra (additional) logos both on- and off- product if they come together respectively labels or promotional panels. This is not the case for the new proposed draft: the distinction is not clear anymore. So, an introductory overview would be of great importance to clarify what is considered promotional and where promotion can be made; such an introduction should be placed either prior to Part II (so that Part II and Part III would be the “natural prosecution” of such an introduction), or at least in the standard Introduction. It would add much clarity to the contents if two sub-sections were presented, the first one focusing on on-product use of promotional elements (see, for example, Clause 5.5), and the second sub-section focusing on the off-product use of promotional elements. Terms like “recommended” or “preferred” should be avoided in such a context. In the old (current) version of the standard, the term “recommended” was adopted, for example, with reference to the label colour...and it’s well known that often such a recommendation has not been followed at all. It would be worth adopting the same graphical approach in presenting which elements can be possibly omitted: refer to Clause 3.3 In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels/artworks, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks. Moreover, in case of doubts, users might decide not to use the trademarks. Clause 5.1 a) It’s not clear whether the text “Forests For All Forever” is the only possible textual choice to be put under the “conventional” promotional panel. It would be worth maintaining the current text “The mark of responsible forestry” as well. Clause 5.1 b) It would add much clarity to the contents if two sub-sections were presented, the first one focusing on on-product use of promotional elements (see, for example, Clause 5.5), and the second sub-section focusing on the off-product use of promotional elements.</p>
FSC Staff	<p>Clause 5.1 In general terms, an introductory section is missing. In fact, Forests For All Forever marks are presented here only as promotional material, but at least one labelling option is explicitly presented in Clause 5.5, and some others are recalled as well, both as on-product (i.e. extra-logos and marks that come in addition to product labels) and off-product use (i.e. promotional panel or stand-alone Forests For All Forever marks). In the previous version of the standard, the distinction between on-product labelling and off-product promotional use was very clear, and it was also clear the possible use of extra (additional) logos both on- and off- product if they come together respectively labels or promotional panels. This is not the case for the new proposed draft: the distinction is not clear anymore. So, an introductory overview would be of great importance to clarify</p>

what is considered promotional and where promotion can be made; such an introduction should be placed either prior to Part II (so that Part II and Part III would be the “natural prosecution” of such an introduction), or at least in the standard Introduction. It would add much clarity to the contents if two sub-sections were presented, the first one focusing on on-product use of promotional elements (see, for example, Clause 5.5), and the second sub-section focusing on the off-product use of promotional elements. Terms like “recommended” or “preferred” should be avoided in such a context. In the old (current) version of the standard, the term “recommended” was adopted, for example, with reference to the label colour...and it’s well known that often such a recommendation has not been followed at all. It would be worth adopting the same graphical approach in presenting which elements can be possibly omitted: refer to Clause 3.3 In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels/artworks, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks. Moreover, in case of doubts, users might decide not to use the trademarks. Clause 5.1 a) It’s not clear whether the text “Forests For All Forever” is the only possible textual choice to be put under the “conventional” promotional panel. It would be worth maintaining the current text “The mark of responsible forestry” as well. Clause 5.1 b) It would add much clarity to the contents if two sub-sections were presented, the first one focusing on on-product use of promotional elements (see, for example, Clause 5.5), and the second sub-section focusing on the off-product use of promotional elements.

FSC Staff

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	textual choice to be put under the “conventional” promotional panel. It would be worth maintaining the current text “The mark of responsible forestry” as well. Clause 5.1 b) It would add much clarity to the contents if two sub-sections were presented, the first one focusing on on-product use of promotional elements (see, for example, Clause 5.5), and the second sub-section focusing on the off-product use of promotional elements.
CB	Has the mark of responsible forestry been abandoned in favour of Forests for All Forever strapline?
CB	Recommendation on the use of FSC website needs to be clear. By recommending you mean that shall be used on countries where it is mandatory?
FSC Staff	Should the inclusion of 'product- or forest-related messaging' be a 'shall' here? Why is this a requirement? It makes use of the logo cumbersome. It is defined as optional in 5.2 so cannot be a 'shall' here. If the Forests for All Forever mark have different requirements to the FSC checkmark-and-tree logo then this should be made clearer, not contradictory. Where is this 'product- or forest-related messaging' defined? Would it be a good idea to make an 'average promotional panel' here which would work for most applications and then describe the variations? a) why is the promotional statement allowed to free-float beneath the panel? Could this have a border to tie it into the rest of the panel? b) This example is really very unattractive and we doubt very much that many CHs would opt for this as the design is very clumsy. Surely this could be redesigned and available in a downloadable format from the Trademark Portal, ready for use? It would be very helpful here to give 4 examples of ways to promote yourself and your FSC products. We would very much recommend inserting a table here showing the required and optional elements of: a) Classic Promotional Panel b) The Promotional Panel using the Forest for All Forever Full Mark c) The Promotional Panel using the Forest for All Forever Text-Only Mark (why is this not illustrated already, is it not allowed to be used in this way?). d) Using the elements of the promotional panel 'presented separately'.
Consultant, Economic North	5.1 a) please state precisely if the former claim "The mark of responsible forestry" will have to be replaced or if CH wish could be kept i.e. on websites, in flyers or other material which is not intended to be changed immediately after Trademark Standard effective date and in order to minimize costs. 5.1 b) this option should be offered as an arrangement in the Label Generator, too, if possible. What is the background for inserting the * between license code and website address? The text layout could be optimized.
Consultant	Ref: "shall" wording in the FSC STD - it was suggested by many stakeholders to replace "shall" with "has/have to or must" e.g. 5.1. ...forest-related messaging has to be included. "Has/have to" is more understandable by non-native speakers than "shall". Majority of stakeholders are non-native speakers / simplification.
CH	Comment to requirement 5.1 Does company is allowed to use other trademarks such as term “Forest Stewardship Council” or initials “FSC” for promotion of FSC certified products and/or promotion of company’s status as FSC certificate holder? No information about other trademark usage promotionally is listed. Or only the FSC logo and “Forest For All Forever” marks can be used to promote the FSC products and company’s status..

## Clause 5.2

If there are space constraints, text may be omitted when using the FSC logo (5.1(a)).

CB	Why only reference 5.1a? Clarify: can the text “By buying this [product] you help take care of the world’s forests” be removed for 5.1b? 5.2 Is this going to be something that can be downloaded in the label generator? Also in this statement: By buying this [product] you help take care of the world’s forests” will the [product] be in a drop-down menu?
CH	In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks. Trademark Portal should also consider “checklists” for users: otherwise, with specific reference to Clause 5.2, it’s likely to be expected that often text will be omitted, even in case of no space constraints.
CB	In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks. Trademark Portal should also consider “checklists” for users: otherwise, with specific reference to Clause 5.2, it’s likely to be expected that often text will be omitted, even in case of no space constraints.
FSC Staff	In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks. Trademark Portal should also consider “checklists” for users: otherwise, with specific reference to Clause 5.2, it’s likely to be expected that often text will be omitted, even in case of no space constraints.
FSC Staff	In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks. Trademark Portal should also consider “checklists” for users: otherwise, with specific reference to Clause 5.2, it’s likely to be expected that often text will be omitted, even in case of no space constraints.
CB	Don´t look like requirements to me. Maybe guidance notes under 5.1.
CH	If the certificate holder consider it necessary, text may be omitted when using the FSC logo (5.1(a)). You could have other constraint than space and the tree logo FSC is not registered with the text (see 1.1)
FSC Staff	How are space constraints gauged/argued/defended? This is subjective and does cause issues for CH’s. If it is optional then let it be omitted whatever the reason.
Consultant	Clarify which text can be omitted; designers/printers would use this vague language to their advantage and use just the tree with nothing else.
FSC Staff	Are the “text” mentioned in these clauses messages related certified products or forest? We should specify it to avoid misunderstanding and confusing promotional panel with FSC labels.
Consultant	Ref.5.2 if ‘text’ means ‘messaging’ (see 5.1) it is more straightforward/simpler to use the same expression, ‘messaging’ instead of ‘text’ (it is a common rule for the legal/normative documents to use the same expression/name for the same issue/topic).

Clause 5.3	The elements (logo/mark, text, licence code, website) may be also presented separately, for example, on different parts of a web page. The FSC promotional panel (5.1(a)) is a ready-to-use arrangement available in the trademark portal.
CH	It's not clear how much different elements can be separated from each other's. Though presented separately, different elements should maintain at least some degrees of "unity" (at least, with specific reference to the license code). The indication "The FSC promotional panel (5.1(a)) is a ready-to-use arrangement available in the trademark portal" should be put as a separate Note under the main Clause, given that it is not normative. In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels/artworks, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks. See comment already provided for Clause 1.1, i.e. the wording should be refined/ made uniform
CB	It's not clear how much different elements can be separated from each other's. Though presented separately, different elements should maintain at least some degrees of "unity" (at least, with specific reference to the license code). The indication "The FSC promotional panel (5.1(a)) is a ready-to-use arrangement available in the trademark portal" should be put as a separate Note under the main Clause, given that it is not normative. In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels/artworks, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks. See comment already provided for Clause 1.1, i.e. the wording should be refined/ made uniform
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CB	Ensure distinction is made between website and web page. How can we check a website that might have a FSC logo on one page, the licence code on another, etc. I don't understand the logic of this.
CB	Don't look like requirements to me. Maybe guidance notes under 5.1.
FSC Staff	'...on different parts of a webpage' what about different parts of a website? How separately can they be presented? This section offers that 'The FSC promotional panel (5.1(a) is a...', please can we make a ready to use arrangement of both Forests for All Forever marks also available for download from trademark portal. This would create the update in use of these marks that we desire.

Clause 5.4	The licence code shall be displayed at least once per material, including when making text-only references to the FSC certification of a product or an organization without using the logo or other marks.
CH	Definition of "material" should be provided – it's likely that the basic idea here is "trademark carrier", e.g. brochure, web page, etc.
CB	Definition of "material" should be provided – it's likely that the basic idea here is "trademark carrier", e.g. brochure, web page, etc.
FSC Staff	Definition of "material" should be provided – it's likely that the basic idea here is "trademark carrier", e.g. brochure, web page, etc.
FSC Staff	Definition of "material" should be provided – it's likely that the basic idea here is "trademark carrier", e.g. brochure, web page, etc.
FSC Staff	'Per material'? What is meant by 'material' – publication, website etc. – can this be defined here? Could this be tied into the definition at the beginning of the section where we define off-product promotion? Add a note to say 'The licence code shall be displayed legibly and in an appropriate place'.
Consultant	This needs to be clarified or rethought – if a printer is using an on-product label, but they are printing the job for another FSC certified organization, the license code does not apply to both companies.
CB, M, Economic North	May be confusing. It says "when making text-only references to the FSC certification of a product," which may be misunderstood for on-product use.
CB, M, Economic North	In 5.4 as mentioned earlier or somewhere else it should be clarified that using the FSC license code on websites JUST ONCE is fine despite the fact that websites have generally several pages.
CH	Including the FSC Tm license code in all applications, even if only once per product or promotional material is an unnecessary extra administrative effort without any benefit for the CH or costumers, leading to reduced use of trademarks. In addition this is the opposite of simplification according to Motion 29.

Clause 5.5	The text mark 'Forests For All Forever' may be used on the right side of the FSC on-product label. The mark shall not be used with promotional panel or with any other visual than FSC logo and on-product label.
CB	Discussing the on-product label with the "Forests For All Forever" text should be done in Part II (the on product labeling section).



CH	<p>This Clause should be placed/recalled in the Part II (label) of this standard. This Clause should be split in two different ones: - The text mark 'Forests For All Forever' may be used on the right side of the FSC on product label. - The mark shall not be used with promotional panel or with any other visual than FSC logo and on-product label. It is a positive change that "The mark shall not be used with promotional panel". Still, it's not clear what actually means that "mark shall not be used with any other visual than FSC logo and on-product label", because full marks and textual marks with logo can be used on-product if they come in addition to a product label, but separately from the label itself. Thus, the term "with" could be refined in a way that does not direct and strict relation. This option should be referred to as use of "extra-logos", as per Clause 4.5, through wording alignment. A specific "promotional label" is presented here, and it is a positive proposed change. Though, this labelling option should be presented in Part II, given that presenting it in Part III suggests the possibility to use it also off-product (option to be definitely avoided). It's interesting that the combination textual FFF mark + label shows the ® symbol: has it been already registered? Why the FFF full mark cannot be used in combination with a label? It could be worth giving such a possibility as well. If it is not allowed, then write it explicitly. Is it possible to use also the landscape label in association with textual FFF mark? If so, add it as visual example. And the same for labels with all the possible elements. Generally speaking: visual examples are fundamental and to be added everywhere! In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks – see also Clause 10.1 (j).</p>
CB	<p>This Clause should be placed/recalled in the Part II (label) of this standard. This Clause should be split in two different ones: - The text mark 'Forests For All Forever' may be used on the right side of the FSC on product label. - The mark shall not be used with promotional panel or with any other visual than FSC logo and on-product label. It is a positive change that "The mark shall not be used with promotional panel". Still, it's not clear what actually means that "mark shall not be used with any other visual than FSC logo and on-product label", because full marks and textual marks with logo can be used on-product if they come in addition to a product label, but separately from the label itself. Thus, the term "with" could be refined in a way that does not direct and strict relation. This option should be referred to as use of "extra-logos", as per Clause 4.5, through wording alignment. A specific "promotional label" is presented here, and it is a positive proposed change. Though, this labelling option should be presented in Part II, given that presenting it in Part III suggests the possibility to use it also off-product (option to be definitely avoided). It's interesting that the combination textual FFF mark + label shows the ® symbol: has it been already registered? Why the FFF full mark cannot be used in combination with a label? It could be worth giving such a possibility as well. If it is not allowed, then write it explicitly. Is it possible to use also the landscape label in association with textual FFF mark? If so, add it as visual example. And the same for labels with all the possible elements. Generally speaking: visual examples are fundamental and to be added everywhere! In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks – see also Clause 10.1 (j).</p>

FSC Staff	<p>This Clause should be placed/recalled in the Part II (label) of this standard. This Clause should be split in two different ones: - The text mark 'Forests For All Forever' may be used on the right side of the FSC on product label. - The mark shall not be used with promotional panel or with any other visual than FSC logo and on-product label. It is a positive change that "The mark shall not be used with promotional panel". Still, it's not clear what actually means that "mark shall not be used with any other visual than FSC logo and on-product label", because full marks and textual marks with logo can be used on-product if they come in addition to a product label, but separately from the label itself. Thus, the term "with" could be refined in a way that does not direct and strict relation. This option should be referred to as use of "extra-logos", as per Clause 4.5, through wording alignment. A specific "promotional label" is presented here, and it is a positive proposed change. Though, this labelling option should be presented in Part II, given that presenting it in Part III suggests the possibility to use it also off-product (option to be definitely avoided). It's interesting that the combination textual FFF mark + label shows the ® symbol: has it been already registered? Why the FFF full mark cannot be used in combination with a label? It could be worth giving such a possibility as well. If it is not allowed, then write it explicitly. Is it possible to use also the landscape label in association with textual FFF mark? If so, add it as visual example. And the same for labels with all the possible elements. Generally speaking: visual examples are fundamental and to be added everywhere! In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks – see also Clause 10.1 (j).</p>
FSC Staff	<p>This Clause should be placed/recalled in the Part II (label) of this standard. This Clause should be split in two different ones: - The text mark 'Forests For All Forever' may be used on the right side of the FSC on product label. - The mark shall not be used with promotional panel or with any other visual than FSC logo and on-product label. It is a positive change that "The mark shall not be used with promotional panel". Still, it's not clear what actually means that "mark shall not be used with any other visual than FSC logo and on-product label", because full marks and textual marks with logo can be used on-product if they come in addition to a product label, but separately from the label itself. Thus, the term "with" could be refined in a way that does not direct and strict relation. This option should be referred to as use of "extra-logos", as per Clause 4.5, through wording alignment. A specific "promotional label" is presented here, and it is a positive proposed change. Though, this labelling option should be presented in Part II, given that presenting it in Part III suggests the possibility to use it also off-product (option to be definitely avoided). It's interesting that the combination textual FFF mark + label shows the ® symbol: has it been already registered? Why the FFF full mark cannot be used in combination with a label? It could be worth giving such a possibility as well. If it is not allowed, then write it explicitly. Is it possible to use also the landscape label in association with textual FFF mark? If so, add it as visual example. And the same for labels with all the possible elements. Generally speaking: visual examples are fundamental and to be added everywhere! In general terms, it would be of great importance that the Label/Panel Generator gives pre-formatted labels/panels, whatever the possible combination will be chosen. Otherwise, if separate elements could be autonomously arranged by users, there will be many non-conformities in the use of trademarks – see also Clause 10.1 (j).</p>

FSC Staff	Please provide additional information. Is there a specific reason that the Forests For All Forever text mark cannot be used with a promotional panel?
FSC Staff	This clause refers to on-product labelling and is not appropriate for this section, Move it to Part II, perhaps near 4.4/4.5. Should it be an R registration mark rather than a TM? Grammar ‘The mark shall not be used with the promotional panel or with any other visual than the FSC logo or on-product label’. Consider replacing ‘visual’ with ‘graphic’.
Consultant	The FFAF logo is twice the size of the FSC label and this is going to steer CHs away from using it. Note 5 – this is odd placement for this note. Could be moved somewhere better, and more visible.
FSC Staff	To be simpler standard I suggest promotional panel also may be used in same way.
Consultant	The “Forests For All Forever” text mark has a registration symbol I, however, according to clause 1.1 and the T&D, the trademarks FSC own are the ‘Forests For All Forever’ – full mark and the ‘Forests For All Forever’ – logo with text mark. Text mark on its own is not a trademark. The use of elements of the ‘Forest For All Forever’ marks is specified as misuse of FSC trademarks according to clause 10.1 (j). FSC should either include this text mark alone as a trademark under clause 1.1 and T&D or remove clause 5.5.
Consultant	Ref. 5.5 - is not clear because it is said that text mark "Forest For All Forever" shall not be used with promotional panel BUT the text is used with the promo panel above /see 5.1.a. The difference between the text mark and the text itself may not be clear enough for stakeholders.

Clause 5.6	<p>Organizations are responsible for their own compliance with national labelling requirements and consumer protection laws in those countries in which products are promoted, distributed, and sold.</p> <p>Note 5. Talking about FSC and FSC-certified products</p> <p>In Annex C of this document, examples of describing FSC and FSC-certified products are presented. For more marketing material, please visit <a href="http://marketingtoolkit.fsc.org">marketingtoolkit.fsc.org</a></p>
CB	How would a domestic auditor of country A know the labeling requirements of country B? This seems overly burdensome to expect CBs to verify that certificate holders are meeting this requirement (i.e. an auditor knowing labeling requirements of all countries?) Also, don't the FSC labels that are created by the label generator already meet national labeling requirements? If a trademark is registered within a country, doesn't that mean that it meets the labeling requirements of that country?
CH	Instead of repeating such Clause twice (i.e. Clause 3.5 and 5.6), it should be put just once on the Ground Rules section.
CB	Instead of repeating such Clause twice (i.e. Clause 3.5 and 5.6), it should be put just once on the Ground Rules section.
FSC Staff	Instead of repeating such Clause twice (i.e. Clause 3.5 and 5.6), it should be put just once on the Ground Rules section.
FSC Staff	Instead of repeating such Clause twice (i.e. Clause 3.5 and 5.6), it should be put just once on the Ground Rules section.
CB	5.6. Repeats 3.5. Why not have this under Part 1; General requirements. Note 5. Why is the hyphen needed between FSC and certified i.e. FSC-certified.

M, Economic South	Clauses 5.6 and 3.5 are overlapping.
FSC Staff	Please provide additional information. Is there a specific reason that the Forests For All Forever text mark cannot be used with a promotional panel?
CH	We agree with clause 5.6 as worded. There is no need to place auditing resources on this clause as the concentration should be on product eligibility to use the label and promote products correctly according to the license holders scope.
FSC Staff	Remove mention of 'national labelling requirements' and 'distributed and sold' from this, as this section is promotional use not on-product use. Amend to 'Organizations are responsible for their own compliance with consumer protection laws in those countries in which products are promoted' as more appropriate for this section. Note 5 – does this refer to the 'product- or forest-based messages' mentioned in 5.1 above? If so move to next to that clause.
CH, M, Economic South	Clause 5.6 and 3.5 are overlapping.
Consultant	This clause is under promotional elements section. So there is no need to refer to compliance with national labelling requirements which is covered in clause 3.5. Reference to consumer protection laws may also be irrelevant here.
FSC Staff	It is unclear why this clause is repeated in the standard. For conformity purposes, if a clause appears once in the standard is enough. If the clause has different interpretations depending on the section that it is placed, you should consider whether the clause can be reworded for a wider scope and application in both scenarios.

*General comments related to this section 5:*

CB	To include the possibility of promotional label carry on more than one FSC licence code.
Consultant	General - will alternate/approvable layouts be provided in the generator? Will the FFAF logs also be moved to the generator?
CH, M, Economic North	We support this section as written.
CH, Economic North	Missing a consumer survey about what they understand with the two logos. What is the "product" in case of beverage carton the carton? The board in the carton Which other wordings are possible? Will FSC IC provide a set? (typo in recommended)
FSC Staff	I miss in the draft the reference to point 7.3 of the current standard (FSC-STD-50-001 V1-2) the use of the FSC trademark in document templates such as letterheads, sales documents and emails. I think it would be very useful to specify in detail how the brand could be used on those supports. Thanks you so much.

## 6. Promotional Use Requirements

Clause 6.1.	It is sufficient to present all promotional elements (5.1) only once in catalogues, brochures, websites, etc. If they list both FSC-certified and uncertified products, a text such as “Look for our FSC®-certified products” shall be used next to the promotional elements and the FSC-certified products shall be clearly identified. If some or all of the products are available FSC certified on request only, this shall be clearly stated.
CB	Does this statement “Look for our FSC®-certified products” have to include the ® if it is not the first use? (This seems to go against clause 1.4)
CB	Very messy FSC(R)-certified. remove hyphen. List is not a good word - better to use 'show' Printers and joiners to not have products. What is the expectation in these cases? Perhaps instead of saying on request only the words 'to order' could be used.
CB	Clarify and insert a general phrase like" FSC products under consultation"
FSC Staff	Amend to ‘It is sufficient to represent the promotional elements (5.1) only once’ – ‘the’ instead of ‘all’. Amend to ‘If both FSC-certified and uncertified...’ remove the ‘they list’.

Clause 6.2.	If the FSC trademarks are used for promotion on invoice templates, delivery notes, and similar documents that may be used for FSC and non-FSC products, the following or similar statement shall be included: “Only the products that are identified as such on this document are FSC® certified.”
CB	Does this line need to include the ®? "Only the products that are identified as such on this document are FSC® certified." Does INT-STD-50-001_14 still apply?
CB	Can we be clear what is meant by 'for promotion' We had previous clarification that the (R) wasn't needed in the disclaimer on an invoice. Has this changed? Is the (R) required if FSC is only used in the disclaimer and there is no FSC Logo used?
CB	Prohibit this usage, because it promotes misuse of the label.
CH	And what about a cardboard box printed with the FSC promotion trade mark of the certified company who use it to carry printed document certified or not certified? The box is not a document, neither a promotional item? In order to avoid any confusion, I have applied the 6.2, but I think the word document is too restrictive
FSC Staff	What is meant by ‘the FSC trademarks’ here? The logo or also the name/initials? Do they need to add this statement if they mention ‘FSC’ or ‘Forest Stewardship Council’ anywhere on the invoice? Or just if they also use the FSC checkmark-and-tree logo or Forest for All Forever Marks? Clarify. Add a reference here to make clear that 40-004 defines how FSC claims shall be presented on sales documents. Make it clear that this clause is not referring to the use of ‘FSC’ or ‘Forest Stewardship Council’ to comply with the requirements of 40-004, but to additional promotional use on invoices for example promoting a company’s status as an FSC-certified company with the FSC checkmark-and-tree logo.

	Replace ‘...invoices, delivery notes and similar documents’ with ‘sales documents (invoices, delivery notes etc.)’.
CH, M, Economic North	The additional proposed language "Only the products that are identified as such on this document are FSC certified." should not be required. Section 5.1g of the FSC Chain of Custody standard already requires a clear indication of the FSC claim for each product item. Additionally, auditors verify that the claims on sales and delivery notices are clear as to what products they apply to. Requiring the additional language on a document that is typically already space limited will result in FSC trademarks being removed from the documents.
FSC Staff	I am strongly against the use of the FSC trademarks for promotional purposes on invoices. Companies may say that they need this kind of promotion, but the risks for the system integrity are higher. This topic was discussed during the last general assembly and addressed a risk for the system. It was a strong argument from the motion proposers about the need to revise the trademark rules.

Clause 6.3.	The FSC logo (1.1(c)) may be used on promotional items not for sale such as mugs, pens, T-shirts, caps, banners, company vehicles. In these cases, the FSC logo and FSC trademark licence code are sufficient.
CH	Such a possibility could be extended to 1.1 (d) FFF-full mark and 1.1 (e) FFF-text mark as well!!
CB	Such a possibility could be extended to 1.1 (d) FFF-full mark and 1.1 (e) FFF-text mark as well!!
FSC Staff	Such a possibility could be extended to 1.1 (d) FFF-full mark and 1.1 (e) FFF-text mark as well!!
FSC Staff	Such a possibility could be extended to 1.1 (d) FFF-full mark and 1.1 (e) FFF-text mark as well!!
CB	It should consider promotional items carrying trademarks of more than 2 organizations (one of them may not be certified).
CB, M, Economic North	6.3 and 6.4 There are two angles to these requirements: a) the CH passing out the promotional items and b) the CH producing them. Does a CH who is producing promotional items on order/request from someone have to confirm that the customer is FSC certified? Does it matter if a non-certificate holder is passing out promotional items carrying the FSC logo? I don't know if the CH SHOULD be responsible for confirming that the customer is certified, but it could be a good safeguard. Currently CHs are required to confirm the customer is certified before passing on a Controlled Wood claim.
FSC Staff	Amend to ‘not-for-sale promotional items’. States ‘The FSC logo (1.1c)’ - does this mean that the Forests for All Forever marks may not be used on promotional items? If not, why not? Replace ‘The FSC logo’ with ‘The FSC checkmark-and-tree logo’ for clarity if so.

Clause 6.4.	If promotional items are made wholly or partly of wood (e.g. pencils or memory sticks), they must meet the applicable labelling requirements as specified by FSC-STD-40-004, but do not need to carry an on-product label.
CB	Clarify if it's necessary to be or not in the scope.

CB, M, Economic North	6.3 and 6.4 There are two angles to these requirements: a) the CH passing out the promotional items and b) the CH producing them. Does a CH who is producing promotional items on order/request from someone have to confirm that the customer is FSC certified? Does it matter if a non-certificate holder is passing out promotional items carrying the FSC logo? I don't know if the CH SHOULD be responsible for confirming that the customer is certified, but it could be a good safeguard. Currently CHs are required to confirm the customer is certified before passing on a Controlled Wood claim.
CB	Does the requirement also applicable for paper, board or other materials made of wood? (E.g. promotional packaging, paper bags and other). Clarification would be helpful.

Clause 6.5.	When FSC trademarks are used for promotion at trade fairs, the organization shall: <ul style="list-style-type: none"> <li>(a) clearly mark which products are FSC certified; or</li> <li>(b) add a visible disclaimer stating "Ask for our FSC®-certified products" or similar if no FSC-certified products are displayed – use of text to describe the FSC certification of the organization does not require a disclaimer.</li> </ul>
CB	Not clear what this disclaimer refers to - can you give an example?
FSC Staff	b) Revert to wording in V2-1 i.e. add full-stop - '...are displayed. Use of text...'

Clause 6.6.	Organizations shall take full responsibility for the use of the FSC trademarks by investment companies and others making financial claims based on their FSC-certified operations.
FSC Staff	Replace 'Organizations' with 'Certificate Holders' for clarity.

*General comments related to this section 6:*

M, Social North	I agree with this section as written.
CH, M, Economic North	I really ask FSC IC to become a FSC certified organization and make use e.g. the Trademark standard binding to ensure that FSC IC is using the Trademarks correct (saw many many examples where this was not the case) and to understand the implications in the daily Business.

## 7. Restrictions on Promotional Use

Clause 7.1.	The FSC trademarks shall not be used together with the marks of other forest certification schemes in a way that implies equivalence or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.
CB, M, Economic North	Examples or intent could be useful since "in terms of size or placement" is ambiguous.

FSC Staff	This clause causes confusion and needs to be clarified. This is often interpreted too strictly to mean that a CH cannot show both logos, talk about both schemes, or explain what the schemes have in common. Yet this is not what is meant. We would not object to a CH explaining that 'FSC and PEFC are both forest certification schemes' or 'We hold both FSC and PEFC certification' and showing both logos. The problem comes with implying that these schemes are interchangeable i.e. that a CH can offer FSC certified products and deliver PEFC, or that they are part of the same scheme 'We are FSC/PEFC' or showing both logos but only talking about FSC certification/products. Suggest replacement wording such as 'in a way that implies products certified under either scheme are interchangeable or is ambiguous as to which certification the products hold.' And/or suggest a disclaimer that if a CH is describing FSC and PEFC in the same promotional material they should include a statement like "Specify FSC or [other forest certification scheme] certified products when ordering". Also separate this clause into two sections a) implies equivalence, b) disadvantageous in terms of size/position, for clarity.
Consultant	Would do good to clarify this further. I realize you do not want to call out other forestry certification schemes in your standard, but too many printers/designers/marketing people want to state 'FSC/SFI certified...' which some CBs allow/approve while others do not. Add more examples of prohibited, 'shall not be used together (such as grouped in a heading, slashed, and similar). Or simply require that FSC is used in an entirely separate sentence/paragraph.
FSC Staff	7.1 is too vague. What is equivalence? What is disadvantageous? Examples is needed and/or more details about these to "criteria".
CB	"In a way that implies equivalence". This is nearly impossible to fulfill, without keeping others complete off! FSC has already preferred status in our organization. However, there are always cases where present both label equal, e.g. in a simple logo overview etc. I'm not legal professional, but I even doubt, that such a rule is legal
FSC Staff	Point 7.1 can be problematic in Indonesia in the case of exporting timber based products from Indonesia. Government of Indonesia have their own mandatory certification scheme of timber legality, namely SVLK (English translated: Timber Legality Verification Standard). The on product label is called V-Legal. It is mandatory for companies exporting wood & other timber based product use the V-Legal label in the packaging and product. We have propose the Trademark Unit to allow the V-Legal label put with FSC label on product but it is still not allowed because there is no clear evidence that V-Legal is different from FSC label. Although V-Legal only for legality but claims used in most of SVLK promotional material by organizations is V-Legal is promoting sustainable forest. After we tell them FSC label cannot be used together with the V-Legal, the company then rather taking FSC label out from their product & packaging than taking out the V-Legal label. The companies are afraid to get sanction from the government if they are not putting the V-Legal label. This is surely not good for FSC. Can we make some special exception for V-Legal, where FSC label can be put with V-Legal for export product (also promotional material)? We can propose a different placement or size for non-FSC label. Thank you. Thank you. Thank you.
FSC Staff	Knowing many used FSC next to PEFC - how and who will check/fight for that?



Clause 7.2	The FSC logo or 'Forest For All Forever' marks shall not be used on business cards for promotion. Text claim with licence code is allowed, e.g. "We are FSC®-certified (FSC® C#####)" or "We sell FSC®-certified products (FSC® C#####)".
CH	Considering the way this Clause has been modified, the following options will become possible: - using labels on the main side of the business card; - using "standard" labels, with no size restrictions; - using Forests For All Forever marks as extra-logos that come in addition to the product label, according to Clause 4.5 (as this is placed in Part II, therefore not referring to promotional use).
CB	Considering the way this Clause has been modified, the following options will become possible: - using labels on the main side of the business card; - using "standard" labels, with no size restrictions; - using Forests For All Forever marks as extra-logos that come in addition to the product label, according to Clause 4.5 (as this is placed in Part II, therefore not referring to promotional use).
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FSC Staff	Considering the way this Clause has been modified, the following options will become possible: - using labels on the main side of the business card; - using "standard" labels, with no size restrictions; - using Forests For All Forever marks as extra-logos that come in addition to the product label, according to Clause 4.5 (as this is placed in Part II, therefore not referring to promotional use).
CB	Can other text claims be approved e.g. FSC(R) certified. Is a printer's mini on product label still allowed on business cards in addition to the CH statement about their certified status? The standard doesn't mention letterheads or stationery - is there no restriction about logos at the top of documents or templates?
CB	On product label on visits cards promotes more confusion than clarification. The FSC could allow promotional label on visits cards with no additional phrase. Visits cards are the company's showcase.
CB, M, Economic North	"For promotion" at end of sentence makes this unclear. If the intent is that the FSC logo and 'Forest[s] for all Forever' marks shall not be used on business cards then strike "for promotion". Also not the missing "s" at the end of Forest.
FSC Staff	Add 'A' to read 'A text claim with licence code is allowed...'
Consultant	So does this mean the mini label at minimum size can no longer be used on FSC certified biz cards? I did not see that other clause in here.
CB, Economic North	7.2 is good!
FSC Staff	Good! Provided the certificate is valid. The distribution of the cards shall immediately cease in case of termination of certification!
Clause 7.3.	FSC-certified products shall not be promoted with the certification body logo alone.

CB, M, Economic North	Unless the CB logo is used in relation to a separate certification, verification, validation.
FSC Staff	Disagree Why not? e.g. NEPCon is helping to promote FSC NTFP's in Russia and Belarus and label is next to FSC and WWF what's the problem with that?

*General comments related to this section 7:*

M, Social North	I believe the FSC logo should be allowed on business cards when text is included similar to rules in section 6.
CH	Could we use the Text claim with licence code e.g. "We are FSC®-certified (FSC® C#####)" or "We sell FSC®-certified products (FSC® C#####)". on other communication medium, for example the first page of a newsletter, the entrance-door of a copy shop?
CH, Economic North	We support this section as written.

## 8. FSC On-product Label and Checkmark-and-tree Logo

Clause 8.1	FSC on-product label and FSC logo shall be used in following colour variations: [Image]
Consultant	Examples shown in Graphic Rules only reference FSC 100%. This is not relevant to paper and printing because there is no FSC 100% paper. The change I suggest is to also include examples for FSC Mix and FSC Recycled as in V1.1 pg. 15.
FSC Staff	Add the FSC checkmark-and-tree logo to this illustration, in all four colours, to make clear talking about both the logo and labels.
Consultant	While I realize it may not be possible for FSC to make this change, we would still like to root for less restrictive color requirements.

Clause 8.2.	The green colour for reproduction shall be Pantone 626C (or R0 G92 B66 / C81 M33 Y78 K28).
CB	Pantone 626c is not appropriate to any kind of FSC products, such as Kraft's packaging.
M, Economic North	The wording in 8.3 is more clear compared to the current standard. The minimum size requirements will allow for more future use of the FSC label. We support this change.
FSC Staff	Please consider looking at the colour variations created when the FSC Pantone Colour Codes are applied to uncoated paper (626C is for coated paper) - this has been reported by certified printers in the past. Also, industry standard presentation for other colour schemes is RGB (0,92,66) and CMYK (81,22,78,28), perhaps change the way these are presented? Heading amend include 'on-product' - 'Size and format of on-product labels'
Consultant, M, Economic North	Please insert the term "transparent" in order to explain this option better, like in current standard 10.1.3.

Clause 8.4.	FSC labels may be used in portrait or landscape versions.
CB	Still think there should be a distinction between a FULL Label and Minimum Elements Label; Otherwise it will be very hard for us to explain to certificate holders what they need to do.
Clause 8.5.	FSC labels shall be printed at a size at which <b>all elements are legible</b> . Minimum size for the label shall be: (a) in portrait format 9 mm in width (b) in landscape format 6 mm in height.
CB	Change “RECOMMENDED minimum size” to “MANDATORY minimum” for a label with all elements.
CH	Reference to the minimum quality of digital pictures should be made. For example, in the current Guidelines for the use of Forests For All Forever Marks (downloadable from the Marketing Toolkit), some minimum threshold shall be met, i.e. 100 px or 150 px (respectively, for textual and full FFF mark).
CB	Reference to the minimum quality of digital pictures should be made. For example, in the current Guidelines for the use of Forests For All Forever Marks (downloadable from the Marketing Toolkit), some minimum threshold shall be met, i.e. 100 px or 150 px (respectively, for textual and full FFF mark).
FSC Staff	Reference to the minimum quality of digital pictures should be made. For example, in the current Guidelines for the use of Forests For All Forever Marks (downloadable from the Marketing Toolkit), some minimum threshold shall be met, i.e. 100 px or 150 px (respectively, for textual and full FFF mark).
FSC Staff	Reference to the minimum quality of digital pictures should be made. For example, in the current Guidelines for the use of Forests For All Forever Marks (downloadable from the Marketing Toolkit), some minimum threshold shall be met, i.e. 100 px or 150 px (respectively, for textual and full FFF mark).
CB	‘All elements are legible’ This is too subjective: Is this with or without glasses???? We can’t approve recommended minimum size. Why not keep it as a required minimum size for the full label? We will have people argue that a 9 mm portrait full label is OK – even if it appears too small to some approvers.
M, Economic South	Excellent change. Now, the minimum size is actually minimum
FSC Staff	Including both a recommended size and an allowed minimum size could add confusion to the requirement. The reduced minimum size for all labels should be thought out more. Allowing the minimum size on all products, no matter the size, could be detrimental to FSC. Perhaps the clause could be revised to have a minimum size that is proportional to the size of the product. We want to be flexible enough to allow reduced size labels where it makes sense, but we don’t want to see very small labels used as a way to disguise the FSC label.
FSC Staff	The minimum size proposed 6mm for landscape and 9mm for portrait is just too small. These will not be legible when printed. We are setting CH up to fail. We recommend that the current mini label minimum sizes of 8mm for landscape and 11mm for portrait are maintained. The illustration for the minimum size is an item without a product type (yet this may be required for some products). If this was illustrated with a product type it would be clear that this size is not viable. The illustration for 8.5 should show all elements that are compulsory or

	compulsory in certain circumstances. Stakeholder Feedback: It has been suggested that there should be a minimum PIXEL SIZE for graphics. Stakeholders reported experiencing difficulty when enlarging FSC labels/logos.
CB, Economic North	Minimum size for standard labels are only “recommended”? That means CBs are not to issue non conformities to standard label with 17mm in width or 12mm in height? That’s confusing.
CH	It is very good for the printing companies and the customers if the size of the label is reduced. It is our experience that many customers wish to insert the label in a size which is slightly smaller than the existing requirements (12 mm and 17 mm)
CH, Economic South	Excellent change. Now, the minimum size is actually minimum.
Consultant, Economic North	a) the minimum size should not be less than 11 mm in width for portrait format and 8.5.b) not less than 8 mm in height for landscape format. I strongly opt for keeping the minimum sizes for former mini label for all labels as a minimum size of less than 8/11 mm would not be legible in most cases. As a consequence this would lead to unnecessary discussions about legibility between CH and CB in audit case or Label approval case.
CB	The minimum sizes for the Labels should stay the same 11mm width/ 8mm height. If the Label is smaller it is not legible anymore. If it is still possible to print an transparent Label on a colored Background please add it to the Standard.

<b>Clause 8.6.</b>	Where adding the product type or translation requires more space, the portrait label may be increased in height and the landscape label in width only.
CB	If the label has to be prepared using the label generator - then it will increase as prescribed so no need to be so specific.
M, Economic South	This flexibility will be very useful.
FSC Staff	The FAQ (point 9) stated that translations can be placed outside the label, within the exclusion zone, if required. Is this still available? If so, include here. Also include the illustration from FAQ for clarity. Can other information also go in the exclusion zone?
CB, M, Economic North	If multiple languages are used, landscape label is to be increased in width?
CH, Economic South	This flexibility will be very useful.

<b>Clause 8.7.</b>	The use of a border around the label is preferred. When the border is not used the label elements shall not be altered or separated.
CB	Does the size remain the same if a border is not used?
CH	Terms like “recommended” or “preferred” should be avoided in such a context. In the old (current) version of the standard, the term “recommended” was adopted, for example, with reference to the label colour ...and it’s well known that often such a recommendation has not been followed at all.

CB	Terms like “recommended” or “preferred” should be avoided in such a context. In the old (current) version of the standard, the term “recommended” was adopted, for example, with reference to the label colour...and it’s well known that often such a recommendation has not been followed at all.
FSC Staff	Terms like “recommended” or “preferred” should be avoided in such a context. In the old (current) version of the standard, the term “recommended” was adopted, for example, with reference to the label colour...and it’s well known that often such a recommendation has not been followed at all.
FSC Staff	Terms like “recommended” or “preferred” should be avoided in such a context. In the old (current) version of the standard, the term “recommended” was adopted, for example, with reference to the label colour...and it’s well known that often such a recommendation has not been followed at all.
FSC Staff	It would be helpful to add clarification for how to measure the label size when a border is not used.
CB, Economic North	Define border. I think it means that line but maybe it means the space around the logo?
FSC Staff	When the border is not used how we take a clear space surrounding label elements? Please clarify it in this clause or clause

Clause 8.8.	When it is not technically possible to print labels with multiple lines for very small products with limited surface for printing (e.g. pens, make-up brushes), a one-line arrangement of label elements may be used following the size guidance of the landscape label.
CH	Text line should be “centered-aligned” with the logo. Individual solutions proposed to FSC via the Certification Body should be still possible, as for Clause 10.1.3 of the old (current) version FSC-STD-50-001 V1-2. In other words, there are no reference to special approvals and they should be maintained.
CB	Text line should be “centered-aligned” with the logo. Individual solutions proposed to FSC via the Certification Body should be still possible, as for Clause 10.1.3 of the old (current) version FSC-STD-50-001 V1-2. In other words, there are no reference to special approvals and they should be maintained.
FSC Staff	Text line should be “centered-aligned” with the logo. Individual solutions proposed to FSC via the Certification Body should be still possible, as for Clause 10.1.3 of the old (current) version FSC-STD-50-001 V1-2. In other words, there are no reference to special approvals and they should be maintained.
FSC Staff	Text line should be “centered-aligned” with the logo. Individual solutions proposed to FSC via the Certification Body should be still possible, as for Clause 10.1.3 of the old (current) version FSC-STD-50-001 V1-2. In other words, there are no reference to special approvals and they should be maintained.
FSC Staff	Replace ‘following the size guidance of the landscape label’ with ‘at a minimum height of 6mm and with all elements legible’. Heading ‘Size of the FSC checkmark-and-tree logo – including within promotional panels’
Consultant	Leaving this up to CHs may cause you issues. I suggest adding ‘up to the CB’s discretion’.
FSC Staff	It's not following the size guidance of the landscape label. It's following the size guidance of minimum size for logo.
FSC Staff	Great!! Let's give this option for printed materials too! This option can also be applied to printed materials/publications + the option to have it either

	horizontally or vertically (as we lose a lot of visibility from printers by restricting this last option!)
CH, Economic North	One-liner trademark use: the text in the example is positioned along bottom of tree-checkmark logo. We have centered placed text, which has been approved for use by our CB. Are there any specific requirements here? 8.8 "... a one-line arrangement of label elements may be used following the size guidance of the landscape label." The Mini label & minimum tree-checkmark logo size requirements for one-liner option seem to somewhat contradict each other, cannot be 6 mm both of them?

Clause 8.9.	The minimum size of the checkmark-and-tree logo – also when used as part of promotional panel – shall be calculated by the height of the logo. Recommended minimum size of the logo is 10 mm, and it shall be no less than 6 mm in height.
CB	Change recommended to mandatory for a checkmark and tree logo, or remove recommended minimum size and just include the minimum size. We have found that when the checkmark and tree logo is used as a promotional panel, 6 mm is too small. For electronic uses, the requirement should be that the trademark license code is legible.
CB	Remove check mark and tree and use FSC Logo instead. Again recommended minimum size is not helpful. Required minimum size is much more realistic from an approvers perspective.
FSC Staff	Add 'The FSC checkmark-and-tree logo shall be reproduced at a size at which all elements are legible.' Also amend to 'The minimum size of the checkmark-and-tree logo – when stand-alone or within the promotional panel – shall be calculated...' Include the promotional panel within the illustration for 8.9 to show the size of the logo as part of the promotional panel as well as standalone (use illustration from Quick Guide p11)

Clause 8.10.	There shall be enough clear space surrounding the label and logo to ensure that they remain uncluttered. The minimum space is calculated by using the height of the 'FSC' initials of the logo.
CB	This should include the interpretation where is ok to have text about the product or the disclaimer on an invoice – or straight lines, etc. impinging on the clear space – anything that doesn't cause a cluttered impression. I know this contradicts my argument about being subjective but this rule really does cause far more trouble than it should (because of ASI's strict interpretation of it).
CB	FSC has a great dimension on its products types and types of usage. This requirement is not appropriated to this scenario. To delete this requirement and put another one: that label should be put in a clearly space, legible, sharp, and separate from other layout's elements.
FSC Staff	Add 'This is referred to as an exclusion zone', Clause 9.9 refers to it so it needs to be defined. Include a promotional panel, stand-alone checkmark-and-tree logo and the promotional panel, in the illustration for 8.10, for clarity. The height of the initials FSC works well to define the exclusion zone when using a promotional panel or label, but for the checkmark-and-tree it is too wide to be practical, especially in a catalogue or other densely printed publication. Consider a new measure

Clause 8.11.	The label or logo shall not be placed on a background that interferes with the design or could be misleading about what the label or logo refers to.
CB	Is this document: COC_GUI_TMBBackgroundGuide_021211, still applicable? If so, it should be incorporated into the standard. Is the fade out exclusion zone required?
CH	This Clause should be split in two different ones: - The label or logo shall not be placed on a background that interferes with the design – The label or logo shall not be placed on a background that could be misleading about what the label or logo refers to. In the case of background interfering with the design, it could be useful to specify that the surrounding clear space can be semi-transparent (i.e. not only on a solid background), if needed, in a way that the semi-solid/transparent background reduces the interferences between the patterned background and the label.
CB	This Clause should be split in two different ones: - The label or logo shall not be placed on a background that interferes with the design – The label or logo shall not be placed on a background that could be misleading about what the label or logo refers to. In the case of background interfering with the design, it could be useful to specify that the surrounding clear space can be semi-transparent (i.e. not only on a solid background), if needed, in a way that the semi-solid/transparent background reduces the interferences between the patterned background and the label.
FSC Staff	This Clause should be split in two different ones: - The label or logo shall not be placed on a background that interferes with the design – The label or logo shall not be placed on a background that could be misleading about what the label or logo refers to. In the case of background interfering with the design, it could be useful to specify that the surrounding clear space can be semi-transparent (i.e. not only on a solid background), if needed, in a way that the semi-solid/transparent background reduces the interferences between the patterned background and the label.
FSC Staff	This Clause should be split in two different ones: - The label or logo shall not be placed on a background that interferes with the design – The label or logo shall not be placed on a background that could be misleading about what the label or logo refers to. In the case of background interfering with the design, it could be useful to specify that the surrounding clear space can be semi-transparent (i.e. not only on a solid background), if needed, in a way that the semi-solid/transparent background reduces the interferences between the patterned background and the label.
CB	Extremely vague and promote lots of confusion, including the FSC guide about backgrounds. Again, the point is has a clearly, sharp, legible label
Consultant	Are you allowing ANY designs/patterns to show through the FSC labels? Some CB's allow it, some do not. Is the background guidance sheet no longer a guidance tool that anyone should use?

*General comments related to this section 8:*

CB	In general, please add more guidance for electronic uses (i.e. websites, Facebook, twitter, etc.)
M, Social North	I agree with greater flexibility for size of logo. If it is big enough to read and not hugely disproportionate to other content it should be allowed.

CB	Title; Remove check mark and tree and just call it the FSC Logo.
CB	FSC labels need to be more interesting for companies' usage. Too much rule discourage the usage.
CH	FSC on-product label and checkmark-and-tree logo, we fully support simplifying text and minimizing of size. We see this as an advantage in general for companies and consumers. For our company this will not change anything, we will continue with the current text and size as we have agreed in in our internal company guidelines.
M, Economic North	Metsä Group welcomes the increased flexibility on size and format of the labels.
CH, M, Economic North	We support this section as written.
M, Economic North	FFIF welcomes the increased flexibility on size and format of the labels.
CH	Would FSC consider increasing the line thickness of the Tree/Tick logo in labels below a certain size to make the log more visible/legible? Better to see from a distance when thicker when the overall label is a small size. Glad to see the allowance to go to a small size and flexibility with elements.

## 9. 'Forests For All Forever' Marks

Clause 9.1.	'Forests For All Forever' trademarks shall be used only in following colour variations: [Image]
FSC Staff	Be consistent with terminology 'Forests for All Forever' marks/trademarks. 9.1 This is not how the marks look if downloaded from the Marketing Toolkit. Variations b), c) and d) are shown on a green background. This background makes them look more attractive than they are. It also suggests that the green background is part of the design (although this is clarified in 9.3). If we are just illustrating the colour options they should be shown on a neutral background e.g. grey, for illustration. If we want CH to use them on a green background (much more attractive) then this is how they should be available for download. Variation d) also shows a graded background, again this is not a requirement or available for download. It is misleading. Consider addition of requirement for contrast here.
CH, Economic North	It does not make sense and hinders the FFAF Label use if the color use requirements differ from the ones for the Standard FSC Label. Please adopt it to a mono color use (darkest color / most contrast) if the preferred Colors are not available (in most cases they are not)
CH, Economic North	'Forests For All Forever' marks use too complex rules, why not allow for darkest colour/legible contrast like other labels/promo logos? - Suggest to allow darkest colours.



Clause 9.3.	No other colours shall be used; the marks shall not be reproduced if the required colours are not available. Please note that the colours only refer to the mark, not the background colour, which is given here only to display marks with white elements.
CH	The provision “Please note that the colours only refer to the mark, not the background colour, which is given here only to display marks with white elements” should be added as a Note under the main Clause.
CB	The provision “Please note that the colours only refer to the mark, not the background colour, which is given here only to display marks with white elements” should be added as a Note under the main Clause.
FSC Staff	The provision “Please note that the colours only refer to the mark, not the background colour, which is given here only to display marks with white elements” should be added as a Note under the main Clause.
FSC Staff	The provision “Please note that the colours only refer to the mark, not the background colour, which is given here only to display marks with white elements” should be added as a Note under the main Clause.
M, Economic South	Why can the label be printed on available colors (not the standard colors) and the “Forests For All Forever” mark does not? The color requirements should be similar for all FSC trademarks. Align this clause with 8.3.
CH, Economic South	Why can the label be printed on available colors (not the standard colors) and the “Forests For All Forever” mark does not? The color requirements should be similar for all FSC trademarks. Align this clause with 8.3.

Clause 9.4.	The minimum size for the ‘Forests For All Forever’ full mark shall be 10 mm in height and for the text-only mark 6 mm when printed: [Image]
CH	Add point 2.2 of FSC-ADV-50-004
CB	Add point 2.2 of FSC-ADV-50-004
FSC Staff	Add point 2.2 of FSC-ADV-50-004
FSC Staff	Add point 2.2 of FSC-ADV-50-004
FSC Staff	Add ‘The Forests for All Forever marks shall be reproduced at a size at which all elements are legible’. Again, consistent terminology ‘text-only’ mark? Also too small, as per 8.5 above, the minimum should be 8mm for landscape and 11mm for portrait.
Consultant	"text-only mark" should be "logo with text mark" according to clause 1.1.

Clause 9.6.	The marks shall not be placed on backgrounds that interfere with the design or could be misleading about what they refer to.
CH	Instead of repeating such Clause twice (i.e. Clause 8.11, 9.6 and 10.1 (i)), it should be put just once in the Ground rules section.
CB	Instead of repeating such Clause twice (i.e. Clause 8.11, 9.6 and 10.1 (i)), it should be put just once in the Ground rules section.
FSC Staff	Instead of repeating such Clause twice (i.e. Clause 8.11, 9.6 and 10.1 (i)), it should be put just once in the Ground rules section.

FSC Staff	Instead of repeating such Clause twice (i.e. Clause 8.11, 9.6 and 10.1 (i)), it should be put just once in the Ground rules section.
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Clause 9.7.	Organizations shall not create new translations or change any elements of the 'Forests For All Forever' trademarks.
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FSC Staff	Start by saying 'Official language translations are available for download from the Marketing Toolkit' before presenting the negative. Make these available for download from the Trademark Portal.
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CH, Economic North	Organizations shall not create new translations or change any elements of the 'Forests For All Forever' trademarks. - Suggest to allow for more translations upon request and approval from CB/FSC.
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Clause 9.8.	The official language versions of the 'Forests for All Forever' trademarks shall be used only in countries stipulated in the Trademark Registrations by Country and Mark that is available in the trademark portal.
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FSC Staff	Does this mean the official language version of the marks shall be used only in the countries in which they have been registered, as listed in this document? Re-phrase for clarity?
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Clause 9.9.	Translations of the strapline 'Forests For All Forever' approved by FSC may be used in text format within the messaging or below the trademark, while respecting the exclusion zones.
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FSC Staff	Specify where these translations can be accessed?
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*General comments related to this section 9:*

CB, Economic North	I love these marks! Hope to see many more CHs using them soon!
CH, Economic North	We support this section as written.
CB, Economic North	As there are several different size requirements, I suggest creating a table that lists all different size requirements for all options.
CB	It would be much easier, if the Forest for all Forever marks are also been able to generate over the Label Generator.

## 10. Misuse of FSC Trademarks

Clause 10.1.	<p>The following are not allowed:</p> <ul style="list-style-type: none"> <li>(a) Changing proportions of any designs</li> <li>(b) Changing or adding to the contents of any designs beyond the specified elements</li> <li>(c) Making FSC appear to be part of other information such as environmental claims not relevant to FSC certification</li> <li>(d) Creating new colour variations</li> <li>(e) Changing the shape of the border or background</li> </ul>
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	<ul style="list-style-type: none"> <li>(f) Tilting or rotating the designs in relation to other content</li> <li>(g) Violating the exclusion zone around designs</li> <li>(h) Combining any FSC trademarks or designs with any other branding in a way that implies association</li> <li>(i) Placing the logo or label on a background that interferes with the design</li> <li>(j) Using elements of the 'Forest For All Forever' marks on their own</li> </ul>
CB	10.1g Clarification of when the fade out exclusion zone mentioned in the Quick Guide To FSC Trademark Usage - Background document, is required.
CB	10.1 e) what if this was a sticky label? f) What about if this was on graphics like hand drawn pictures? What about labels at 90 degrees to text? g) What about including the logo in a box with bar codes. This seems to be allowed quite frequently.
CB	Letter (I): to change the picture because It seems is not allowed to use stencil on wood.
FSC Staff	Place each illustration next to each listed item, to make it clear and easy to understand. Amend wording for j) as this applies to both Forests for All Forever marks and checkmark-and-tree logo (initials FSC are often removed). Also can we have more attractive illustrations showing common mistakes, e.g. adding likely words to be used 'our garden furniture is FSC certified for strength and durability' rather than 'text text text' (for example c). We can find lots of examples of real mistakes for inspiration.
Consultant	(i) - again, clarify backgrounds/patterns showing through the logos.
CH, M, Economic North	g) and i) are not defined so far. Ask to Keep it simple: ensure FSC Trademarks are readable and not misunderstood being connected with neighboring info.
Consultant, M, Economic North	10.f a rotation of the on-product-logo of 90° should explicitly be possible.(not for Promotional Elements).

*General comments related to this section 10:*

M, Social North	I agree.
CH	Section 10 It could be worth relocating this section in the Ground rules section.
CB	Section 10 It could be worth relocating this section in the Ground rules section.
FSC Staff	Section 10 It could be worth relocating this section in the Ground rules section.
FSC Staff	Section 10 It could be worth relocating this section in the Ground rules section.
CB, Economic North	This is helpful
CH	Ok
CH, Economic North	We support this section as written.

## Annex A. Additional trademark rules for group, multi-site, and project certificate holders

<p>Clause 1.1.</p>	<p>The group entity (or manager, or central office) shall ensure that all uses of the FSC trademarks by the group entity or its individual members are approved by the certification body prior to use, or that the group has opted to use the trademark use management system. When seeking for approval by the certification body, group members shall submit all approvals via the group entity or central office and keep records of approvals. Alternative submission methods may be approved by the certification body.</p>
<p>CB</p>	<p>There is an extra for that should be deleted! When seeking FOR approval by the certification body</p>
<p>Consultant</p>	<p>A strength of the FSC brand is that it is actively monitored by Third Party Certifiers. This is particularly important to ensure the appropriate use of the Trademark. Printers are essentially custom manufacturers. Their objective is to please their clients. The approval process requirement enables them to say they need to comply with FSC graphic standards and that they can't get away with any deviation because use needs to be submitted for approval. The correct use of the trademark is also important to their clients so proof of approval they can print and place in job dockets is also important to them. Therefore, prefer not to offer self-approval status, particularly for members of our Group Certificate. This creates risk. Particularly with the group of small printers I manage because they do not do many jobs at all during an audit year. I am copied on the approvals and see that changes are requested by the Third Party Certifier often enough to verify the risk level. Also, as Group Manager I do not and will not assume responsibility for trademark use. The Group is too diverse and also I am not available at all times to check/approve the use for them. It is extremely efficient the way it presently is. Rainforest Alliance is very prompt with requests for changes and approvals. Printing has become a "just-in-time" business so the above is important. Companies within my Group do comment on the promptness of their required approvals. Additionally, I am the Group Manager for a number of small printers and am not at their premises except for an annual audit. Being copied on their approvals by Rainforest Alliance allows me to monitor their activity and to determine if extra training/explanation is required at time of audit. Also, it would add considerably extra time to audits for Group Managers as well as for Third Party Certifiers which I do not feel is the best use of our expertise. The suggested requirement for achieving self-approval by taking on-line training and passing an on-line test means that printers will need to invest more of their time than it takes to quickly submit a request for approval and file the approval appropriately for each FSC print job they produce. The lag time between FSC projects for many of the small printers in the OPIA Group is significant and the training can be easily forgotten. Fundamentally, each submission is a refresher training which is essential for many of FSC certified printers. Further to the above comments about the potential of weakening the brand, I express my opinion regarding the marketplace perception, specifically applied to printed products: Most printers have become FSC certified because of customer demand. If the FSC Brand is perceived by the marketplace to be weakened, end users/customers of printers may feel the brand is not as credible as it once was. If that becomes a perception, the end users will stop requesting it and therefore printers who are certified to meet their needs would no longer require FSC certification. If FSC Trademark use further diminishes, that, in my opinion, further lessens the brand impact and credibility in the marketplace. Reference to Group members shall submit all approvals via the group entity or central office and keep records of their</p>

	<p>approvals. The OPIA Group members submit their approval requests directly to Rainforest Alliance. I am copied on the Rainforest Alliance approvals only, not the submissions. As Group Entity, we do not have staff available at all times to manage the approvals which would significantly delay the trademark use approval process. As Group Manager I want the process to stay as it is: approval request sent by Group Members directly via the Rainforest Alliance approval portal. I will continue to be copied on the approvals/change requests etc. Both myself as Group Manager and all Group Members to retain records of approvals, as is presently done. Also, as noted above, I do not want the option of self-approval status.</p> <p>Proposed Change to Annex A 1.1 The group entity (or manager, or central office) shall ensure that all uses of the FSC trademarks by the group entity or its individual members are approved by the certification body prior to use. (Remove “or that the group has opted to use the trademark use management system. When seeking approval by the certification body, group members shall submit all approvals via the group entity or central office and keep records of all approvals. Alternative submission methods may be approved by the certification body.”) The reason for this is that it would segue group members as well as third party certifiers to ask individual group entities to offer this service. Please see comments above which substantiate this. The group entity (or manager, or central office) shall ensure that all users of the FSC trademarks by the group entity or its individual members are approved by the certification body prior to use. Group members shall keep records of approvals. Alternative submission methods may be approved by the certification body. (Removal of reference to self-approval status and removal of reference to Group members submitting all approvals via the group entity or central office.)</p>
FSC Staff	Amend to “an approved trademark use management system”.

Clause 1.3.	No other forest certification schemes’ marks or names shall appear on any membership documents issued by the group in connection with FSC certification.
CB	If a group member is FSC and PEFC certified, then the Group Manager should be able to produce some documentation (Not a certificate) that mentions both FSC and PEFC.
CB, Economic North	Delete this section. Group and Multisites have integrated management systems with a lot of different certification schemes. It is totally unnecessary to have an exclusion for FSC in this field.

Clause 1.4.	Subcodes of members shall not be added to the licence code.
FSC Staff	Would it not be helpful to include subcodes on the licence code? This would facilitate consumer checking and trademark protection if they were available to search on the info.fsc.org database.
Consultant	Please consider using sub-license codes for Multi-site and Group certificates. Our group certificate has over 200 printers, so it would be hard for us to narrow down which member did a certain print job.

*General comments related to Annex A:*

M, Social North	Group certification allows small family run businesses to gain and maintain certification. Currently group certification treats these businesses as second class citizens by not providing individual license codes and not presenting their product list in a searchable format on the info.fsc.org database. These are disadvantages. We must issue each group member their own license code and set info.fsc.org up so that products offered by each group member can be viewed vs a giant list of all products offered by all group members. I propose the trademark standard be drafted to allow this modification.
CH	use of a unique licence code by each individual member the option to use management system could be very useful for printing companies
FSC Staff	Title – called ‘multi-site’ here, but ‘multiple site’ in D References above.
CH, Economic North	We support this section as written.
CH, Economic North	What is the trademark use Management System? Please explain please include self-approval procedure for multi-site which is audited in external Audit. Otherwise big companies and their CBs will face issues by many 100.000 approval requests per year.

## Annex B. Trademark use management system

Clause 1.1.	<p>The organization shall implement and maintain a trademark use management system adequate to its size and complexity to ensure its continuous conformity with all applicable requirements of this standard (FSC-STD-50-001 V2-0), including the following:</p> <ul style="list-style-type: none"> <li>(a) appoint a management representative who has overall responsibility and authority for the organization’s conformity with all applicable trademark requirements;</li> <li>(b) implement and maintain up-to-date documented procedures covering the trademark control within the organization;</li> <li>(c) define the personnel responsible for the implementation of each procedure;</li> <li>(d) train defined staff on the up-to-date version of the organization’s procedures to ensure their competence in implementing the trademark management system;</li> <li>(e) maintain complete and up-to-date records of trademark approvals, which shall be retained for a minimum period of five (5) years.</li> </ul>
CH	1.1 e) It should be specified that also the approval(s) by the internal controller(s)/approver(s) shall be given in writing and retained for the minimum period of 5 years.
CB	1.1 e) It should be specified that also the approval(s) by the internal controller(s)/approver(s) shall be given in writing and retained for the minimum period of 5 years.
FSC Staff	1.1 e) It should be specified that also the approval(s) by the internal controller(s)/approver(s) shall be given in writing and retained for the minimum period of 5 years.

FSC Staff	1.1 e) It should be specified that also the approval(s) by the internal controller(s)/approver(s) shall be given in writing and retained for the minimum period of 5 years.
CB	Best not to state the version number of the standard as this will have to be updated with each update... 5 years seems excessive for trademark approval records - many of which will be printed and discarded in far shorter timescale. Is there more information about the Trademark Management system and the Trademark control system? How is the CB approving the internal trademark control process?
M, Economic South	It is excellent to consider the size and complexity of the organization. 1.1e: The requirement to keep records for a minimum period of five years should be applicable for all approvals, coming both from the company or CB approval. Therefore, this requirement should be placed on the main part of the standard.
FSC Staff	This is fantastic! A welcome addition to the FSC systems. The order of the two sections needs to be reversed – The ‘Trademark control system’ needs to be presented first (explaining that CH can either have a management system or get approval for all uses of the trademark), then the ‘Trademark management system’ explaining in detail what this is. Perhaps it should be recommended best practice for all CH to run a trademark management system, even if they submit all trademark uses to the CB for approval? It helps to ensure that all trademark use is checked by the CH’s ‘trademark controllers’, as this would reduce misuse and facilitate wider promotional use of the trademarks by CH. 1.1 c) are the ‘responsible personnel’ the same as the ‘designated trademark controllers’ in 2.2? Consistent terminology.
CB, Economic North	I suggest in 1.1 to write that "alternatively to approvals through certification bodies the organization can implement . . ."
CH, Economic South	It is excellent to consider the size and complexity of the organization. 1.1 e: The requirement to keep records for a minimum period of five years should be applicable for all approvals, coming both from the company or CB approval. Therefore, this requirement should be placed on the main part of the standard.
CH	1.1 e) Please clarify what is “maintain complete and up-to-date records of trademark approvals”? In our company the trademark approvals were kept by the related product development staff when needed will contact the related product development staff for the record, not sure whether it meets the new standard

Clause 2.1.	Prior to use of the FSC trademarks, the organization must ensure trademark control by implementing an internal trademark control process or by receiving external approval from its certification body.
FSC Staff	This whole section gives background as to when and how the Trademark management system is implemented. It should go at the top of this Annex and be called ‘Background’ or similar. Calling one ‘control’ and the other ‘management’ is confusing. 2.1 Add ‘Each’ - ‘Prior to each use of the FSC trademarks...’. Amend wording to say ‘the organization must ensure trademark control by implementing an approved Trademark Management System or by submitting all intended uses of FSC trademarks to its certification body for approval’, as per wording used in 1.6.
M, Economic North	Can a Group Management staff member also go through the process to review/approve tmk uses for members? Is this a case by case basis? Example, I

	was TMK manager at RA for many years, and now I am a group manager for many group/multi site certificates. Is it possible for me to get this type of system, in addition to my sites/members?
CB	Uses language "must ensure" - this should be aligned with shall/should language for clarity. 2.1 I suggest that this requirement is either edited for clarity or references requirement 2.4 - as is now it is not clear that there is a process to having an internal trademark control process approved and that trademarks shall be submitted to the CB until a good record of submissions has been demonstrated.
Consultant	The term "must" should be "shall".
CH, Economic North	2.1) Being able to use the FSC trademark as off-product promotion on social media is very important to us. Social media has a great potential in the marketing of our company's commitment to FSC as well as the FSC trademark in general. Communication on social media is fast and it is important to be able to post and respond on various platforms. Therefore, we find it very important to implement a system where certificate holders can do off-product promotion on social media without the need of having every single post approved by the certification body. We think that establishing a strong system for internal approval of off-product marketing in conjunction with training of relevant members of the organization is a good solution. It will help put more focus on FSC and expose the brand name before a new audience and in new ways. In addition, we believe that establishing an internal system for approval will be relatively easy for most organizations.

Clause 2.2.	Organizations' internal control systems shall include designated trademark controllers who act as internal approvers of the trademark use. Trademark controllers must have been trained on FSC trademark use – the online FSC Trademark Training Course for Certificate Holders is recommended.
CH	2.2 Considering that labelling results from the right implementation of the CoC system, including control system(s), trademark management representative and trademark controller(s) should act in tight connection with the CoC management representative that FSC-STD-40-004 V3-0 refers to. The indication “the online FSC Trademark Training Course for Certificate Holders is recommended” should be placed as a Note under the main Clause. Others means of training should be accepted as well. Clauses 3.1 and 3.3 of Annex 3 of the previous draft D1 are worth to be recalled here.
CB	2.2 Considering that labelling results from the right implementation of the CoC system, including control system(s), trademark management representative and trademark controller(s) should act in tight connection with the CoC management representative that FSC-STD-40-004 V3-0 refers to. The indication “the online FSC Trademark Training Course for Certificate Holders is recommended” should be placed as a Note under the main Clause. Others means of training should be accepted as well. Clauses 3.1 and 3.3 of Annex 3 of the previous draft D1 are worth to be recalled here.
FSC Staff	2.2 Considering that labelling results from the right implementation of the CoC system, including control system(s), trademark management representative and trademark controller(s) should act in tight connection with the CoC management representative that FSC-STD-40-004 V3-0 refers to. The indication “the online FSC Trademark Training Course for Certificate Holders is recommended” should be placed as a Note under the main Clause. Others



	means of training should be accepted as well. Clauses 3.1 and 3.3 of Annex 3 of the previous draft D1 are worth to be recalled here.
FSC Staff	2.2 Considering that labelling results from the right implementation of the CoC system, including control system(s), trademark management representative and trademark controller(s) should act in tight connection with the CoC management representative that FSC-STD-40-004 V3-0 refers to. The indication “the online FSC Trademark Training Course for Certificate Holders is recommended” should be placed as a Note under the main Clause. Others means of training should be accepted as well. Clauses 3.1 and 3.3 of Annex 3 of the previous draft D1 are worth to be recalled here.
CB	The training required by Trademark controllers is vague - FSC Trademark training course is recommended? Is this sufficient? Is so, why not make that the requirement?
M, Economic South	The FSC Trademark Training Course should be mandatory, to ensure a complete understanding of this standard and the correct use of FSC trademarks. Although, for this it would be necessary to have the training in many different languages.
CB, Economic North	In the case of a certificate transfer, is the new CB obliged to accept the previous CBs approval until/unless there is a problem identified? or is the new CB required to re-assess their management system for approval before they can do their own approvals? That should go in FSC-PRO-20-003 as well. If the answer is that they next CB can accept their approval then they need to maintain a record of this approval, only in the case of a certificate transfer.
FSC Staff	Replace ‘internal control systems’ with ‘Trademark Management System’. Consistent terminology – ‘responsible personnel’ or ‘designated trademark controllers’. ‘Trademark controllers must have been trained on FSC...’ Move this to the Trademark Management System section, as part of the a)-e) list. Define where the CH can find the Trademark Training if we are advocating FSC training or explain what would suffice and how CB would assess.
CB	Second sentence indicates "must have" - this should be aligned with shall/should language for clarity.
CH, Economic South	The FSC Trademark Training Course should be mandatory, to ensure a complete understanding of this standard and the correct use of FSC trademarks. Although, for this it would be necessary to have the training in many different languages.
CH	Organizations’ internal control systems shall include designated trademark controllers who act as internal approvers of the trademark use." it would be a bit difficult to achieve as all the trademark approval is arranged by individual product development staff and this staff is responsible to contact the certification body for trademark approval and keep the email trademark approval for record. This system works well. If internal approvers are needed, that means we need to have extra work load for certain staff to act as internal approvers.
FSC Staff	Amongst those who responded there was a clear preference to make the trademark control system organization based rather than person based. So rephrase 2.2. ... Shall include procedures for designating trademark controllers... Avoid a situation where the system (and the approval of the system) heavily relies on one person and where the system fails when the person leaves the organization.
CB	Clause 2.2. Would like to see this as a must (trademark training).

Clause 2.4.	The organization shall demonstrate good understanding of the requirements in question by submitting sufficient number of consecutive correct approval requests to the certification body for each type of intended use (i.e. organizations controlling both labelling and promotion shall submit requests for each). It is at the discretion of the certification body to determine when the organization has demonstrated a good record of submissions.
CB	"It is at the discretion of the certification body to determine when the organization has demonstrated a good record of submissions." What does a record of failure mean? More information to ensure calibration across CBs on "demonstration of a good record". Do auditors need to be trained trademark approvers in order to audit this?
CH	It should be clarified the meaning of "sufficient number" and "good record", possibly giving examples and/or providing guidance. It should be clarified the meaning of "type", possibly giving examples and/or providing guidance. It should be stressed more clearly that the Certificate Holder may apply the trademark management system only after approval by Certification Body (once it has determined a good record of submissions). It could be worth adding some suggestions/requirements to/for Certification Bodies, to be added in the "20 series" standards, in order to assess the good record of submissions, e.g. providing an assessment matrix.
CB	It should be clarified the meaning of "sufficient number" and "good record", possibly giving examples and/or providing guidance. It should be clarified the meaning of "type", possibly giving examples and/or providing guidance. It should be stressed more clearly that the Certificate Holder may apply the trademark management system only after approval by Certification Body (once it has determined a good record of submissions). It could be worth adding some suggestions/requirements to/for Certification Bodies, to be added in the "20 series" standards, in order to assess the good record of submissions, e.g. providing an assessment matrix.
FSC Staff	It should be clarified the meaning of "sufficient number" and "good record", possibly giving examples and/or providing guidance. It should be clarified the meaning of "type", possibly giving examples and/or providing guidance. It should be stressed more clearly that the Certificate Holder may apply the trademark management system only after approval by Certification Body (once it has determined a good record of submissions). It could be worth adding some suggestions/requirements to/for Certification Bodies, to be added in the "20 series" standards, in order to assess the good record of submissions, e.g. providing an assessment matrix.
FSC Staff	It should be clarified the meaning of "sufficient number" and "good record", possibly giving examples and/or providing guidance. It should be clarified the meaning of "type", possibly giving examples and/or providing guidance. It should be stressed more clearly that the Certificate Holder may apply the trademark management system only after approval by Certification Body (once it has determined a good record of submissions). It could be worth adding some suggestions/requirements to/for Certification Bodies, to be added in the "20 series" standards, in order to assess the good record of submissions, e.g. providing an assessment matrix.
M, Economic South	Is this clause a pre-requirement for companies to be able to use the trademark use management system? If yes, this should be clarified. It is not clear the need

	to have approval from the certification body prior to implementing an internal trademark control process.
CB	Leaving this up to the certification body can create inequality between CH's and disadvantages (or undue advantages) for CBs. However, I do appreciate the flexibility, as such I suggest adding language to the accreditation standard for CBs to ensure a minimum bar of quality is met.
CH, Economic South	Is this clause a pre-requirement for companies to be able to use the trademark use management system? If yes, this should be clarified. It is not clear the need to have approval from the certification body prior to implementing an internal trademark control process.
Consultant	It is not clear if this is a pre-condition for implementing the internal TM control system or not. It sounds as if this is so. If so, it has to be made clear that this is a pre-condition and the organization needs CBs approval to implement internal TM control system. If this is not a pre-condition, then wording should be something like: Organization shall demonstrate, during surveillance audits, that their internal TM control system is functioning to ensure that all trademark uses are in compliance with the applicable requirements by providing auditor(s) with sufficient number of samples of TM internal approval records.
FSC Staff	Regarding 2.4 CHs argue that they rather see a defined number instead of 'sufficient' number.

Clause 2.5.	If an organization demonstrates consistent failure to control its FSC trademark use, the certification body may request that all trademark use be submitted for approval by them prior to use.
CH	It should be clarified the meaning of “consistent”, possibly giving examples and/or providing guidance.
CB	It should be clarified the meaning of “consistent”, possibly giving examples and/or providing guidance.
FSC Staff	It should be clarified the meaning of “consistent”, possibly giving examples and/or providing guidance.
FSC Staff	It should be clarified the meaning of “consistent”, possibly giving examples and/or providing guidance.
CB	Same comment as 2.4 above. [Leaving this up to the certification body can create inequality between CH's and disadvantages (or undue advantages) for CBs.] However, I suggest this needs better definition for CH's within the standard.

*General comments related to Annex B:*

M, Social North	I support this management system approach. Great work.
FSC Staff	The trademark management system is a welcome addition. Additional guidance on how the trademark management system should be monitored and audited by certification bodies would be helpful to ensure consistent implementation.
CB	Generic approval should be issued for: specific product group and label type. Generic approval should include phrases Generic approval should include colorful labels (for packaging's companies, for example, with a dynamic production)
Consultant	1.6 The organization shall have a trademark use management system in place to submit/manage all intended uses of FSC trademarks to its certification body for approval. Please see Annex B for further information on the trademark use management system. In Annex B remove clauses 2.1, 2.2, 2.3 in their entirety. The

	reason for this is to allow Group Certificate Managers to opt for trademark use submission to its certification body apart from exceptional or grandfathered cases. See additional comments in the previous section that substantiate this.
M, Economic North	The trademark items in this self-approval section make sense and will provide greater implementation of label use by certificate holders and certification bodies without driving costs in the future as trademark use continues to grow.
CH	The online FSC Trademark Training Course for Certificate Holders is recommended. How can I do to download this course on my own E-learning platform?
M, Economic North	Metsä Group supports the proposed improvements to trademark management and control systems
CH, Economic North	We support this section as written.
CH, Economic North	UPM supports the proposed improvements to trademark management and control systems.
M, Economic North	FFIF supports the proposed improvements to trademark management and control systems
CH, Economic North	Easy self-approval procedures and a random sampling Formular for various fault rates should be sufficient. Annex B is really overload and massive Approach. Reading it you may think FSC is a Trademark selling organization which I hope it is not and that efforts are focused on responsible forest management certification and traceability
Consultant	The relationship between Clause 1 and Clause 2 are not clear. Some contents seem to be overlapping. They should be combined to simplify.
Consultant, Economic North	We do not support the Trademark use management system because it will increase the risk of logo-use which is not in line with the standard world-wide. Withdrawal of companies from this system because of nonconformity with the standard will only be decided on base of audit once a year when the labelling will already has been executed distributed in the markets and consequently disinvestments corrective action will cause unevaluable high costs for CH.
FSC Staff	The term documented procedures could be better elaborated. CBs and CHs may interpret that just have a procedure saying, the company needs to follow the FSC trademark rules is enough, without describing how the trademark shall be used. Ideally, companies should develop an internal trademark use manual describing how they are going to use the trademarks and CBs should approve it. If they pre-develop some examples of how they are going to use the FSC trademarks in different applications, and this manual is provided for the staff that is going to use the trademarks, the risk is much lower that they make an incorrect use of the trademarks.
FSC Staff	This is the most important part of the revised standard. I hope it will make it to the final approved edition.
CH	Make the online training course or a questionnaire compulsory. There needs to be a standardization between certificate body's about what a 'good record' is, needs to be fairness between organizations.
CH	This is good for org. that do a lot of promotional material with FSC trademarks.

## Annex C. How to describe FSC and products with FSC claim

	<p>Here are some examples on how to talk about FSC and how to describe FSC-certified products. This list is not intended to be exhaustive; other alternatives are possible as long as they transmit the meaning of FSC correctly. Please also see <a href="http://marketingtoolkit.fsc.org">marketingtoolkit.fsc.org</a> for ideas for messaging and inspiration for creating marketing materials.</p> <p>[ <i>Examples</i> ]</p>
CH	<p>Annex C - How to describe 100% label The indication "This product is made of FSC®-certified [material]" is misleading in relation to other FSC categories. In fact, also FSC Recycled and FSC Mix products can be considered and made of FSC-certified materials, even at their 100% (=completely), e.g. mixing reclaimed and FSC 100% inputs. Annex C - How to describe Mix label Annex C provides example, that are not strictly normative. Nonetheless, the provision "Do not say that product carrying the 'Mix' label is made of material from responsibly or well-managed forests without referring to other sources used" should be "upgraded" to normative Clause Annex C - How to describe Recycled label Annex C provides example, that are not strictly normative. Nonetheless, the provision "Do not say that a product carrying the 'Recycled' label is made of material from responsibly or well-managed forests." should be "upgraded" to normative Clause.</p>
CB	<p>Annex C - How to describe 100% label The indication "This product is made of FSC®-certified [material]" is misleading in relation to other FSC categories. In fact, also FSC Recycled and FSC Mix products can be considered and made of FSC-certified materials, even at their 100% (=completely), e.g. mixing reclaimed and FSC 100% inputs. Annex C - How to describe Mix label Annex C provides example, that are not strictly normative. Nonetheless, the provision "Do not say that product carrying the 'Mix' label is made of material from responsibly or well-managed forests without referring to other sources used" should be "upgraded" to normative Clause Annex C - How to describe Recycled label Annex C provides example, that are not strictly normative. Nonetheless, the provision "Do not say that a product carrying the 'Recycled' label is made of material from responsibly or well-managed forests." should be "upgraded" to normative Clause.</p>
CB	<p>Remove the hyphen from FSC® certified. It serves no purpose and makes text much easier to read. Under the Mix label: Should this be recycled not recycling? This product is made of material from recycling and other controlled sources.</p>
FSC Staff	<p>We welcome the addition of this annex. We suggest adding the following for "How to describe FSC":</p> <ul style="list-style-type: none"> <li>o The Forest Stewardship Council is an independent nonprofit organization that promotes environmentally sound, socially beneficial, and economically prosperous management of the world's forests. FSC was created in 1993 to help consumers and businesses identify products from well-managed forests. FSC sets standards by which forests are certified, offering credible verification to people who are buying wood and wood products.</li> <li>o The Forest Stewardship Council helps consumers and companies identify and purchase products from responsibly managed forests. FSC conserves wildlife habitat, protects clean water and respects the rights of Native people and local communities on nearly 200 million hectares (500 million acres) of forest around the world.</li> </ul> <p>• We suggest adding the following for the Mix label:</p> <ul style="list-style-type: none"> <li>o This product supports responsible forest management.</li> </ul>

CB	This Annex is very interesting. In conformance with this initiative and FSC's Strategic Plan of being a more known mark, this standard could have this structure: 1)Objective; 2)Introduction; 3)Guarantees and impacts of FSC Certification(such as the annex C, phrases to help CH to describe the FSC certification's impacts and guarantees; 4)Promotion usage; 5)ForSes (what is, importance, opportunity, types of usage and allegations); 6)Forest for all forever as a communication tool 7)On product usage 8)Communities: A great value in FSC System. This annex should be extremely simplified with visuals rules for communities use FSC labels and allegations. Kind of guide to simplify and to stimulate the use by those CH. 9) Loggers and forest managers: complicating. This annex should be aligned with the annex 8 proposal: be extremely simple to be used as a guide to loggers and forest managers. Today, they don't use the FSC labels because the standard is too complicated to them and they give up. 10) multisite and group specifications 11) definitions
CB, Economic North	great!
FSC Staff	Annex C - How to describe 100% label The indication "This product is made of FSC®-certified [material]" is misleading in relation to other FSC categories. In fact, also FSC Recycled and FSC Mix products can be considered and made of FSC-certified materials, even at their 100% (=completely), e.g. mixing reclaimed and FSC 100% inputs. Annex C - How to describe Mix label Annex C provides example, that are not strictly normative. Nonetheless, the provision "Do not say that product carrying the 'Mix' label is made of material from responsibly or well-managed forests without referring to other sources used" should be "upgraded" to normative Clause Annex C - How to describe Recycled label Annex C provides example, that are not strictly normative. Nonetheless, the provision "Do not say that a product carrying the 'Recycled' label is made of material from responsibly or well-managed forests." should be "upgraded" to normative Clause.
M, Economic North	Adding this section on how to describe FSC and products was much needed and will provide clarity to new certificate holders and also in cases where trademarks could be misused within new product sectors. We support the claims options provided. The amount of bullet points for each label should be the same number. I suggest only having 3 for each label type and if one label type has more options provided it should be the 100% label on premise that the environmental chamber would prefer that this label is treated as a stronger label. The smallholder label should be placed below the 100% label as smallholder guidance will often be sought in conjunction with the 100% label.
FSC Staff	Annex C - How to describe 100% label The indication "This product is made of FSC®-certified [material]" is misleading in relation to other FSC categories. In fact, also FSC Recycled and FSC Mix products can be considered and made of FSC-certified materials, even at their 100% (=completely), e.g. mixing reclaimed and FSC 100% inputs. Annex C - How to describe Mix label Annex C provides example, that are not strictly normative. Nonetheless, the provision "Do not say that product carrying the 'Mix' label is made of material from responsibly or well-managed forests without referring to other sources used" should be "upgraded" to normative Clause Annex C - How to describe Recycled label Annex C provides example, that are not strictly normative. Nonetheless, the provision "Do not say that a product carrying the 'Recycled' label is made of material from responsibly or well-managed forests." should be "upgraded" to normative Clause.
CH	Nice to have guidelines
FSC Staff	Annex C Fantastic! This is a real asset. Include a section giving suggestions for 'product- or forest-related messaging' as specified in 5.1. Does this just mean

	<p>'Forests for All Forever' and 'The Mark of Responsible Forestry'? Or are others allowed? 'The FSC label means that the material used for this product comes from [see label-specific text]' Does this mean the specific text that appears on the products' label? Or the wording suggested below in this Annex related to different label claims? Amend to 'label specific text, below' if appropriate. '[Material] of this product' – change to 'in this product'? Mix label – all these texts fail to mention FSC at all. Surely we want to mention our brand whenever possible in messaging – not generically “certified” bur FSC-certified. For example 'This product is made of FSC-certified and controlled material'. Also 'made from recycling' is odd wording, 'made from recycled materials' is better (and ties in with on-product label text). The FAQ has a section of 'prohibited extra statements' (item 36). It would be good to include these and others here to show what is not allowed.</p>
Consultant	<p>What about environmental claims? You used to require a certain tagline about FSC not being responsible for these, when used in addition to the label. I do not see that in this revised standard.</p>
M, Economic North	<p>The text in the last bullet point of 100% label (This FSC label means that wood has been harvested to benefit communities, wildlife and the environment) relates to smallholder label and should only be used in conjunction with that label. The text should be deleted. The text in the last bullet point of recycled label (The FSC label on this [product] ensures responsible use of the world's forest resources) is misleading since the FSC origin of recycled material cannot be verified. The text should be deleted.</p>
CH, Economic North	<p>We support this section as written.</p>
CH, Economic North	<p>Annex C 100% label (page 23): The text in the last bulletin point (This FSC label means that wood has been harvested to benefit communities, wildlife and the environment) relates to smallholder label and should only be used in conjunction with that label. Under 100 % this text should be deleted. Annex C Recycled label (page 24): The text in the last bullet point (The FSC label on this [product] ensures responsible use of the world's forest resources) is misleading since the FSC origin of recycled material cannot be verified. The text should be deleted.</p>
M, Economic North	<p>100 % label on page 23: The text in the last bullet point (This FSC label means that wood has been harvested to benefit communities, wildlife and the environment) relates to smallholder label and should only be used in conjunction with that label. The text in the last bullet point should be deleted. Recycled label on page 24: The text in the last bullet point (The FSC label on this [product] ensures responsible use of the world's forest resources) is misleading since the FSC origin of recycled material cannot be verified. The text in the last bullet point should be deleted.</p>
CB	<p>In these two examples: "FSC® helps take care of forests for future generations." "FSC® helps take care of forests and the people and wildlife that call them home." I suggest including reference to the forest or landowner as the FSC does not manage lands directly and this language can be interpreted in a way that implies they do. For example consider, "FSC(R) certification helps take care of forests..." or something similar. Pre-approved FSC Mix label claims all reference controlled sources - how is it these claims in conformance with requirement 2.1(e)?</p>
CH, Economic North	<p>Could be copy pasted to PEFC as well. What makes the difference is the 3 chamber balanced System with equal voting rights and that all major global NGOs are on board. ...Ah by the way if FSC trademarks are used in a global / geographic unspecific context (like a Webpage) "TM" is required to be used and not "R" like</p>

	in this consultation ....would be addressed if FSC IC is as well FSC certified and audited against the Standards.
FSC Staff	[How to describe a product with FSC label/claim: Mix label]About the mention "Do not say that product carrying the 'Mix' label is made of material from responsibly or well-managed forests without referring to other sources used." Always referring to other sources is required too much detailed describing and It's unreasonable. To avoid misunderstanding that all materials are from responsibly or well-managed forests, we could say "FSC®-certified/based responsibly or well-managed forests materials have been used for this product."
Consultant, Economic North	Please definitely check the descriptions by native speaker. Some examples for possible correction: The FSC....is a ...organization dedicated to promote responsible forest .... FSC helps to take care...
FSC Staff	Rephrase this sentence as follows: FSC® helps take care of forests, the people and wildlife that call them home. (I deleted the first "and" of the sentence and replaced it by a comma). / This promotional phrase may sound misleading for consumers: "This FSC® label means that wood has been harvested to benefit communities, wildlife, and the environment." Consumers might not understand how cutting a tree may benefit the wildlife and environment.
CH	This is good, should be promoted outside of the standard as well.
CB	Should it not be clarified that these are extra statements that can be used with the FSC logos?
FSC Staff	p. 24 about smallholders label... would leave in brackets [product] instead of wood - smallholders are not only working with wood

## Annex D. Terms and definitions

	For the purposes of this standard, the terms and definitions given in FSC-STD-01-002 <i>FSC Glossary of Terms</i> and the following apply. [ <i>Terms and definitions</i> ]
CB	Add definition, clarify what "text claim" means (3.1). Add definition, clarify "printed publication" (3.6a). Add definition, "retailer"
CH	Annex D Glossary should be limited only to terms that directly concern the Trademark use and/or that have been specifically modified for the purpose of this standard: "FSC-certified product"; "FSC logo"; "FSC trademark licence agreement"; "FSC trademark licence code"; "FSC trademarks"; "Label generator"; "Moebius loop"; "On-product label"; "Product type"; "Small and community producer"; "Trademark management system". The definition of "mark" should be provided as well, especially if it specifically refers to the Forests For All Forever trademark.
CB	Annex D Glossary should be limited only to terms that directly concern the Trademark use and/or that have been specifically modified for the purpose of this standard: "FSC-certified product"; "FSC logo"; "FSC trademark licence agreement"; "FSC trademark licence code"; "FSC trademarks"; "Label generator"; "Moebius loop"; "On-product label"; "Product type"; "Small and community producer"; "Trademark management system". The definition of "mark" should be provided as well, especially if it specifically refers to the Forests For All Forever trademark.
CB	Include Valid certificate in the glossary.



CB	to include ForSes definition.
CB, Economic North	Promotional Item, Border
FSC Staff	Annex D Glossary should be limited only to terms that directly concern the Trademark use and/or that have been specifically modified for the purpose of this standard: “FSC-certified product”; “FSC logo”; “FSC trademark licence agreement”; “FSC trademark licence code”; “FSC trademarks”; “Label generator”; “Moebius loop”; “On-product label”; “Product type”; “Small and community producer”; “Trademark management system”. The definition of “mark” should be provided as well, especially if it specifically refers to the Forests For All Forever trademark.
FSC Staff	Glossary should be limited only to terms that directly concern the Trademark use and/or that have been specifically modified for the purpose of this standard: “FSC-certified product”; “FSC logo”; “FSC trademark licence agreement”; “FSC trademark licence code”; “FSC trademarks”; “Label generator”; “Moebius loop”; “On-product label”; “Product type”; “Small and community producer”; “Trademark management system”. The definition of “mark” should be provided as well, especially if it specifically refers to the Forests For All Forever trademark.
FSC Staff	Annex D Certificate: why is this a generic definition, when this is mentioned in this document we mean specifically an FSC certificate, a certificate from another scheme would not be acceptable. FSC trademark licence code: remove the space in the example licence code ‘FSC@C#####’ so that it stays together as one item, all on one line. On-product label: The definition in 40-004 V3 is clearer, and includes excellent examples of on-product labels. Product type: Include examples of product types for clarity. Include definitions for ‘Label Claim’ and ‘Label Text’, with examples.
CH, Economic North	We support this section as written.
FSC Staff	[On-product label] We are usually using "FSC label" in same meaning as On-product label. We should define On-product label and FSC label are same meaning.