FSC Brief:

The future of the "Forest For All Forever" brand mark and promotional designs



- Strengthening our commitment to credible claims

1. THE DECISION

To reinforce confidence in the global credibility of the FSC marks and support FSC licence holders in navigating emerging global anti-greenwashing legislation, FSC is retiring the "Forests For All Forever" (FFAF) brand mark for all licence holders. Additionally, promotional licence holders (PLHs) will no longer be able to access and use the FSC promotional panel designs.

2. CONTEXT AND DRIVERS

Global legislation targeting greenwashing, as well as scrutiny of corporate sustainability communications, are on the rise. The <u>EU's Empowering Consumers for the Green Transition Directive</u> (EmpCo) is a key driver to strengthen consumer protection and restrict unfair commercial practices, such as misleading environmental claims, sustainability labels, and promotional materials. This Directive will become effective in September 2026.

This is not just a European development. Jurisdictions are the globe are updating their existing consumer protection laws [1] to investigate and sanction greenwashing practices.

Within this context, FSC has commissioned extensive analysis and legal review of our systems, with a targeted focus on the FSC trademark portfolio, FSC labels, and FSC promotional designs. The external and independent review identified a high risk of noncompliance for license holders when using the "Forest for All Forever" brand mark as it includes the generic environmental claim "forest for all forever" which is assessed as aspirational, unqualified, and too broad to meet the required standards for specification and substantiation.

The promotional panel design is now considered a sustainability label under EmpCo and therefore requires monitoring by a competent and independent third party. With over 70% of PLHs operating within the EU market and directly affected, we will be retiring the promotional panel design for PLHs to minimise the impact on the Promotional Licence Holder programme. PLHs can continue to use the FSC name, initials and the FSC logo with confidence, following the guidance provided in this document.

[1] Australia, see Green marketing and the Australian Consumer Law.
Canada, see Competition Act, main focus Bill 96
China, see Advertising Law and Environmental Protection Law
Colombia, see Decreto 1369/2014
Singapore, see Consumer Protection (Fair Trading Act) 2003 and The Singapore Code of Advertising Practice
United Kingdom, see Green Claims Code
United States, see FTC Green Guide

3. IMPACT AND NEXT STEPS

By retiring the FFAF brand mark, FSC reinforces confidence in the continued use of its trademarks and label. Licence holders operating in the EU market can continue selling and promoting their products using the FSC marks without a predefined arrangement.

Though this transition may require extra effort, we are committed to making it as seamless as possible with tools and resources available to support. FSC Brand Hub, for instance, is already being set up for these changes.

The trademark use for PLHs is governed by the FSC Trademark Use Guide for Promotional Licence Holders which is currently under the revision. The updated Guide will include all changes highlighted in this document and will be published in Q2 2026. Whilst a transition is not applicable to guidance documentation, PLHs will have until September 2026 to align their FSC trademark use with the updated requirements.

4. TECHNICAL GUIDANCE

PLHs can align their FSC trademark use to Empowering Consumers Directive prior to the effective date of the FSC Trademark Use Guide by making targeted changes to their promotional use of the FSC trademarks.

PROMOTIONAL USE OF FSC TRADEMARKS

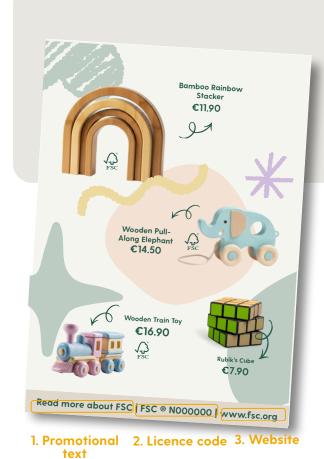
Remove all FFAF marks from your promotional materials by September 2026 and replace with an FSC trademark such as the FSC logo.



Remove all promotional panel designs from your promotional materials by September 2026 and replace with the FSC standalone logo.



USING THE FSC LOGO, FSC INITIALS AND FULL NAME CORRECTLY



With any use of FSC trademarks, include:

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

All promotional statement must include the FSC website address <u>www.fsc.org</u>

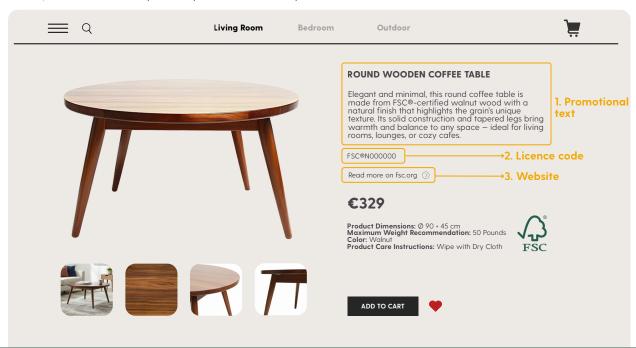
DO NOT use a border or a closed shape around the FSC logo.

elements in a design arrangement that resembles the FSC label or the promotional panel design.

Checklist for e-commerce product listings*

*For e-commerce and webshops, each product listing is treated as a separate promotional instance.

Therefore, it must include either the full promotional panel or all of the mandatory elements in the checklist.

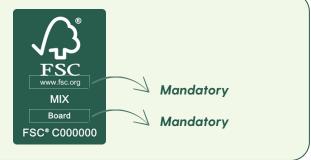


TECHNICAL GUIDANCE FOR YOUR FSC-CERTIFIED SUPPLIERS

Your suppliers holding a valid FSC certification can align their trademark use to EmpCo requirements by making targeted changes to their FSC on-product label. This alignment does not require transition to FSC-STD-50-001 V3, as all suggested changes are compatible with FSC-STD-50-001 V2-1*.

*Please note that all trademark use must conform with the requirement of FSC-STD-50-001 V2-1. The suggested changes highlighted in the technical guidance section focus on aspects which are not currently mandatory under FSC-STD-50-001 V2-1 (or only mandatory in some situations), but are important for EmpCo alignment of FSC trademark use.

1. USE THE ON-PRODUCT LABEL WITH UPDATED MANDATORY ELEMENTS IN ALL SITUATIONS





Clarifying statements: When the product type alone does not provide enough clarity, include a statement to specify what the FSC label refers to.

E.g.: The FSC label refers to the copy paper sheets..

The label product type 'Paper' could refer either to the copy paper or the paper packaging, it is unclear.



