Forest Stewardship Council®

EMPOWERING CONSUMERS DIRECTIVE FAQ – PROMOTIONAL LICENCE HOLDERS

This FAQ addresses aspects related specifically to FSC's alignment with the requirements of the Empowering Consumers Directive and does not constitute a comprehensive resource for your compliance needs. Please refer to the ***Questions & Answers*** *published by the European Commission for additional information; available here.*

SUMMARY HIGHLIGHTS

What are the major changes introduced for FSC to align with the Empowering Consumers Directive (EmpCo)?

There are two major changes introduced to ensure alignment with EmpCo:

1. Phase out of the FFAF mark for all FSC licence holders (certificate holders and promotional licence holders);
2. Phase out of the promotional panel arrangement for FSC promotional licence holders.

NOTE: Please keep in mind that any artwork update which modifies the FSC trademarks (e.g. removing the FSC promotional panel and including the mandatory elements for promotion as standalone) is considered a new artwork and must be submitted for approval to your Trademark Service Provider (TSP).

FFAF PHASE OUT – TIMELINE

When is the FFAF mark phase out effective?

We encourage all licence holders which use the FFAF mark on products or in any kind of communication (digital or print) on the EU market to remove it by **September 2026**, when the transition/grace period of the revised FSC Trademark Use Guide for Promotional Licence Holders ends. If you are purchasing FSC-certified products that include the FFAF mark, this will have to be removed in line with the guidance provided. Please note that your FSC-certified suppliers may continue to use the FFAF marks until 1 January 2029, in line with the FSC transition deadline for trademark use requirements for them (FSC-STD-50-001). We suggest that you proactively inform your suppliers (especially if based outside the EU) that you expect removal of the FFAF marks from the products you are sourcing by September 2026.

FFAF PHASE OUT – STOCKS, MISUSE, DEROGATION

What will be the rules around existing FSC-certified stocks with the FFAF mark?

All products placed on the EU market or promoted on the EU market are expected to be compliant from September 2026, including stocks. The EU Commission clarifies this in the Questions & Answers dated 27 November 2025, p. 17: *"The ECGT Directive shall apply from 27 September 2026. From that date, traders will need to ensure that their environmental claims and sustainability labels in a business-to- consumer context comply with the new provisions, including for existing products."*

If selling or promoting FSC-certified products with the FFAF mark on the EU market, we recommend as a transparency measure that they be covered or removed by September 2026.

If selling or promoting FSC-certified products with the FFAF mark outside the EU market, the current FSC rules for stocks apply. This means that all products with the FFAF mark approved under FSC-STD-50-001 V2-1 and conforming with that standard can continue to be sold until exhaustion of stocks.

What should you do with ongoing or planned B2C/B2B marketing campaigns featuring FFAF, especially in markets where FSC is used in sustainability storytelling?

The FFAF mark will need to be removed by the effective date of the FSC Trademark Use Guide for Promotional Licence Holders, which will be no later than September 2026

How will FSC handle situations where license holders especially PLHs continue using FFAF post-deadline, intentionally or unintentionally? Will it be the usual process of misuse?

Usage of FFAF past the FSC Guide transition timeline (September 2026) will be handled as a misuse by FSC, through the usual process.

In addition to this, licence holders might be exposed to noncompliance risks on the EU market if they do not adhere to the September 2026 legislative deadline set by EmpCo. FSC is not liable for unauthorised uses that take place after the phase out deadline, as FSC has explicitly communicated the need to cease such uses to comply with the Directive.

PROMO PANEL PHASE OUT FOR PLHS

What will be the rules around existing promotional material with the promotional panel design?

Online materials should be updated to remove the promotional panel by latest September 2026. Existing printed promotional material stocks (e.g. product catalogue, leaflets, posters etc.) which use the promotional panel must be updated before September 2026 (reprint, sticker over the promotional panel, cover the promotional panel etc.). If the printed promotional materials are distributed outside the EU, you may use them until exhaustion of stocks.

Will an alternative design be offered?

This is under consideration, but may prove difficult as the design cannot use visual markers which make it similar to a sustainability label, such as being contained within a border, using graphical elements similar to a certification mark, using a licence code etc.

What alternatives do PLHs have?

PLHs can continue using the recognizable FSC logo. Please refer to the Trademark Use Guide for Promotional Licence Holders for examples. We will also be providing more assets for PLHs as part of the FSC Brand Hub.

TOOL UPDATES – FSC BRAND HUB

When will the FFAF marks be removed from FSC Brand Hub?

The FFAF mark was removed on 1 June 2026, when the new FSC Trademark Use Guide for Promotional Licence Holders was published.

When will the promotional panel for PLHs be removed from Brand Hub?

The design was removed on 1 June 2026, when the new FSC Trademark Use Guide for Promotional Licence Holders was published.

LABELLING

What happens with product stocks which feature an FSC label with a different configuration of elements than the one provided in the alignment guide?

All PLHs which place FSC-labelled products on the EU market need to ensure that the labels are in line with the FSC guidance for EmpCo alignment. When you identify labels which do not include all the recommended label elements, you have three strategies:

1. Cover the labels. This removes the ability to promote the products as being FSC-certified. This option is recommended if the product type is not included on the label or anywhere else on the product.
2. If only missing the fsc.org address, you may add this information at the point of sale (in store or digital) as an additional transparency measure.
3. If feasible, ask your suppliers for corrections (e.g. stickering) before delivery.

My labelled products are only missing the FSC website address. Can I continue distributing them on the EU market?

In our assessment, FSC labelling applied to products as a result of a properly conducted certification process remains legally valid before and after September 2026. Even where certification has been carried out under earlier versions of our standards, we do not consider that the relevant requirements materially differ from those that will apply to certification schemes from September 2026 under the EmpCo Directive. The introduction of additional marking elements or modifications in the labelling by FSC should not be interpreted as suggesting any shortcomings in the previously applicable standards. Rather, these adjustments represent a refinement of an already established and reliable framework. FSC has addressed these changes proactively, using them as an opportunity to further enhance the transparency and clarity of our certification system (namely, through the inclusion of the fsc.org website address as a mandatory element in FSC on-product labels). As an additional transparency measure, you may also add the FSC website address at the point of sale, in line with European Commission guidance (Questions & Answers dated 27 November 2025, p. 17).