



Forest Stewardship Council®



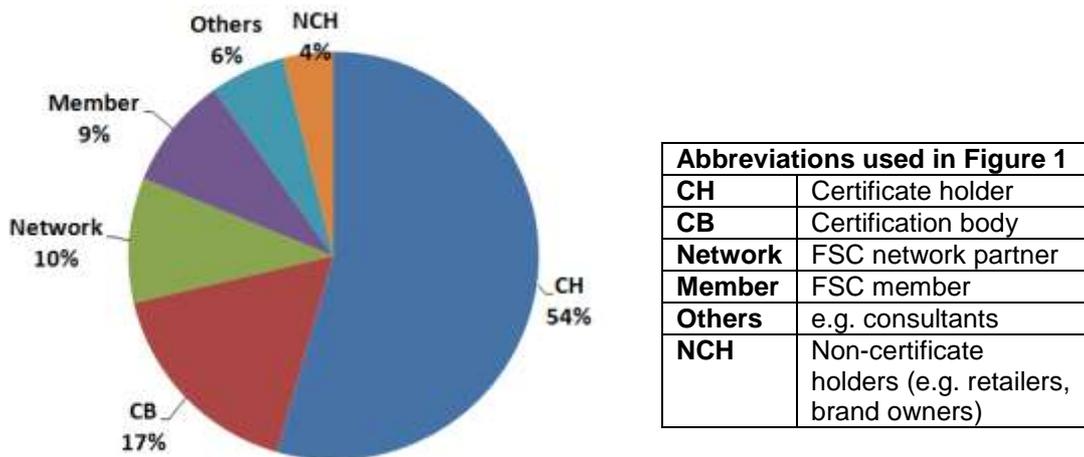
# Report of the first public consultation of requirements for FSC® trademark use by certificate holders

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

## Summary of the consultation results

FSC-STD-50-001 defines the requirements of FSC trademark use by certificate holders. The first draft of revised requirements with a discussion paper on FSC on-product labels was open to public consultation between 16 November 2015 and 31 January 2016. This report presents a summary of key stakeholder feedback received during this consultation and the FSC commitments on each topic.

FSC received 790 comments on the draft and 160 comments on the discussion paper.



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

The individual comments on FSC-STD-50-001 are presented in Table A (page 8) and comments related to the discussion paper in Table B (page 79). For reasons of confidentiality, the names of respondents are omitted in 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 the technical feasibility and alignment with the FSC mission and strategic planning. The following is a summary of the key topics identified in the consultation.

### 1. FSC on-product labels

Along with the draft requirements, a discussion paper on FSC on-product labels was released for consultation. In the discussion paper, two options were presented:

- (A) change the Mix label text (and three alternatives for the text were provided) for improved clarity; and
- (B) create one generic label for all FSC-certified products for added simplicity of use.

The one label model option (B) received more positive feedback (about 20 respondents) than changing the Mix label text option (A) (about 13 respondents). The one label model also received objections from stakeholders (about 14 respondents)

related mostly to the overly generic and misleading nature of the label that would not differentiate mixed materials from 100% materials.

Many stakeholders stated that they would not want to see either option and, based on their comments, a third option (not initially presented) was identified:

(C) keep the current labels and do not to change them (~25).

The third option was justified by cost factors and not seeing the benefits to the FSC system in changing the labels.

Environmental stakeholders were mainly behind option (A) to change the Mix label text, whereas option (B) (one label) and particularly option (C) (not to change the text) were supported by certificate holders.

The numbers here are given as directional approximates only as single comments might have had elements of several categories in them, and because the third option was not provided as an alternative in the original discussion paper.

Based on the mixed feedback, and also on numerous comments requesting this, FSC decided to postpone the drafting of the next version of the document until research on consumer perception of FSC labels had been conducted. The research was carried out by B2B International in China, Germany, and the USA in September–November 2016. One focus group discussion was organized per country to capture the main viewpoints of consumers, which formed the basis of the design of an online survey. The survey received over 2000 individual responses. All age groups (between 18 and 65 years) and both genders were represented. The goal of the research was to assess how the FSC labels are currently perceived in terms of clarity and whether changing the Mix label text would make it any clearer. Also questions regarding the one label option and all the information provided on the label was included to assist with other consultation questions.

Consumers are not generally aware that FSC has three different label categories (80 per cent). When the three labels were shown, 58 per cent regarded them as similar, but thought they had at least some understanding of the differences between the three labels. The current Mix label text was rated “clear” by fewer respondents than the 100% and Recycled labels (60 per cent cf. 74 per cent and 73 per cent). When the use of controlled wood and the process of mixing materials was explained, slightly fewer respondents rate the Mix label as clear (56 per cent).

When presented with four alternatives for the Mix label text – including the current one – to order in terms of clarity, the most common first choice was “responsible use of forest resources”. The second choice for under 45-year olds was the current “from responsible sources” and for over 45-year olds it was “from certified and controlled sources”. When asked to rate “certified” and “controlled” in terms of the expected level of diligence of the process (before the difference was explained), half of the respondents rated “certified” as more diligent, while 29 per cent said that “controlled” was more diligent.

More than half said that their preferred option would increase the clarity of the label. The effect was higher for younger respondents (72 per cent) and with those that chose “responsible use of forest resources” as their first choice (66 per cent).

When the credit system was explained, 60 per cent said they did not need more information about this feature on the label, while 40 per cent would like to have this more visible.

More than half of respondents regarded the information provided on the mini label as sufficient and they would not need additional explanation (label text). In general, the main concern of respondents was to understand the main FSC message better rather than focusing on more detailed information on the product label. Some 72 per cent of the respondents looking to do more for the environment believed that the information provided by the mini label was enough to help them with purchasing decisions.

At the same time, a desk analysis of costs was carried out on all the labelling options. The costs would be borne by certificate holders and brand owners, with FSC costs limited to design and tool updates.

The highest costs are related to the one label option (B) as all labels in use would have to be changed. The factors increasing costs per user are:

- printing technique using plates intended to be used for several years (high costs in thousands of US dollars for creating each new plate);
- products with design already in place that were intended to be used for several years;
- large number of product designs, going up to hundreds of titles.

This option would also create savings in the future through reduced administration of different labels.

Changing the label option (A) would also create costs because the Mix label is the most often used label in the FSC system. The factors increasing costs per user are:

- printing technique using plates intended to be used for several years (high costs in thousands of US dollars for creating each new plate);
- use of the Mix label on a large number of products;
- products with designs already in place that were intended to be used for several years.

There would be no savings from this option.

Option (C) is cost-neutral for all users.

The FSC conclusion on the labelling model was based on stakeholder consultation, consumer research, and impact analysis. The one label option (B) was preferred, but also objected to by many stakeholders. The consumer analysis did not show clear preference for this model over the other options. Changing the Mix label text (A) would slightly improve the clarity of the label for consumers. The current text is considered somewhat vague, but it is not seen as misleading. The benefits that could be achieved by changing the text are not considered to outweigh the costs created by requesting such a change. This was also strongly voiced in the stakeholder

comments by certificate holders. Therefore, it is suggested that FSC will stay with the current labels and focus on raising awareness of FSC.

## **2. Trademark use approval**

The first draft presented a model whereby FSC certificate holders could qualify to approve their own use of FSC trademarks instead of sending all uses to their certification body for approval before publication. The intention of the suggestion was to smooth and speed up the trademark use process by reducing the need for external approval. Stakeholders expressed views in support of introduction of such a system, but also voiced some concerns about incorrect labelling and misuse. There was also some confusion about the meaning of the self-approval system.

In the second draft, the original concept has been changed and a trademark use management system is introduced instead. Certificate holders may choose their preferred model: either approval by a certification body for each use, or developing and maintaining a trademark use management system of their own. The elements of such a system are specified to clarify the intention (FSC-STD-50-001 V2-0 Draft 2-3 Annex B). More flexibility is provided in terms of the source of training received – users must simply attend appropriate training and demonstrate good understanding of the requirements.

## **3. Promotion on invoices**

In the first draft, a new restriction on promotion on invoices and delivery notes was presented to reduce confusion about FSC certification status of products on documents that may or may not include FSC-certified products. Stakeholder comments indicated that this is regarded as an important channel of promotion for certificate holders. It was stated that there already is a requirement to identify FSC-certified products and this was seen as sufficient to mitigate risk of confusion. On the basis of these comments, the clause allowing general promotion on invoices has been brought back. An explanatory text that only products marked as FSC are certified is required to reduce the risk of confusion, as before.

## **4. On-product label size and elements**

The first draft presented radically reduced sizes for on-product labelling. A minimum size was provided only for the label with minimum elements. In most cases, the legibility of the label elements would have been the determining factor for label size. Stakeholders were divided approximately equally in their comments: almost half of respondents welcomed the change as providing more labelling opportunities, while half were supportive of having no size requirements at all. Also bigger sizes were requested and a separate minimum size for the label with full elements was asked for.

In the second draft, the minimum size of the labels has been further reduced. In addition, the concept of label elements has been changed and the 'full label' and

'mini-label' categories abandoned. In this approach, FSC provides a set of labelling elements, defines the minimum elements, and the user can choose which of the optional elements they wish to use. This has been introduced to allow flexibility, which is also supported by the consumer research: their preferred level of detail depended on or varied according to the type product in question. For example, for solid wood products in a high-price category (e.g. furniture or building material), more information is deemed necessary than for paper or packaging products. Users would have more choice, but would also need to take more responsibility in making sure that the label complies with the requirements of intended markets. With reduced labelling elements, FSC cannot guarantee full compliance in all cases. Stakeholders are presented with a specific question on this suggestion in this second consultation.

## **5. Labelling arrangements**

The stakeholder comments highlighted the difficulty for the supplier's certification body to audit when the supplier uses the buyer's code only for products for that buyer. The wording has been changed to give the responsibility to the buyer and to reflect the situation where one or both of the certificate holders is in charge of their own trademark use via a trademark management system.

Arrangements with uncertified parties were returned to the draft at the request of stakeholders. In addition, a new way of making arrangements with uncertified licence holders is presented in an additional consultation question.

## **6. Placement of on-product label**

In the first draft, the requirement of visible labelling was changed from a requirement (shall) into recommendation (should). This was welcomed by stakeholders as additional flexibility, but it also created questions on how the information would be available for clients. The suggestion has been retained but further explanation included about the consequences of choosing to label products in a way that is not visible to consumers, e.g. inability of retailers to promote them, and not being able to add a logo on the outside the pack if the on-product label is not accessible for the client (e.g. inside sealed sales packaging).

## **7. Promotional use of FSC trademarks**

Stakeholder feedback indicated that the wording was not clear in all parts. It also requested that FSC provide ready-to-use sentences to describe FSC and FSC-certified products. The wording of this section has been clarified and more examples of different situations given, such as promotion without FSC logo. A new Annex C has been added to provide examples of such messaging.

Stakeholders requested clarification of the language in the clause concerning trademark use in catalogues and on websites and made several suggestions on how to do it. In the second draft, the wording has been simplified to better reflect the intention to be precise on which products are certified and which are not.

Stakeholders welcomed the possibility to be able to mention FSC certification on business cards with text as suggested in the first draft, but they also requested to be able to use the logo. In some cases, the latter was only suggested for the cases where the business card is made of certified material. The suggestion remains the same in the second draft of the requirements. This decision stems from past experiences of misleading promotion on business cards, and considerations around the implications of lifting the restriction on general promotion when no products have been sold with FSC claims within 12 months.

## **8. Trademark symbol use**

The use of the trademark symbol elicited many comments from stakeholders. It is acknowledged that the system is complicated. The complexity is not created by FSC, but by differing national and regional trademark laws. FSC, as the trademark owner, has the duty of protecting the trademarks to safeguard the investments and trust put in the system by members and licence holders. Without support of the certificate holders as licensees, it will not be possible to protect the shared investment at a tolerable level. FSC insists on the use of trademark symbols to protect the registration of the FSC trademarks, to protect the use of those trademarks by license holders and to protect FSC and license holders against claims of third party infringements. Not insisting on this would inevitably cause problems both for users of the marks and for FSC in many markets. FSC has conducted legal analysis on this aspect several times over the past years. In the second draft, the use of symbol TM is recommended but not required and the wording has been modified to clarify the need to use the trademark symbols in relation to text only once per material.

## **9. On-product labels on online publications**

The first draft included a recommendation to remove FSC on-product label from any online versions of documents that are distributed both as hard copy and electronic versions. Stakeholders pointed out the difficulty of enforcing such a rule or recommendation as certificate holders do not have control of how the copies are being used and distributed by their clients. The recommendation has been removed from the second draft so as not to create confusion and additional barriers, but it is still considered good practice to do so wherever possible.

**Table A. Comments received during the first public consultation of FSC-STD-50-001 V2-0**

Reference Part No. / Clause. No. / Note/Annex/Definit ion (e.g. "Introduction"; clause 3.1; p. 8, line 3)	Type of comment G = general; T = technical; E = editorial	Comment Justification / rationale for change	Proposed change Suggested new wording (additions, modifications, deletions)
Introduction	G	<p>As the proposer of last GA's motion 29 – the logo motion – I would like to state here that the proposed draft is not reflecting the logo motion nor the necessary changes. The main high level critic points are:</p> <ul style="list-style-type: none"> <li>• The logo motion and logo users request to reduce bureaucratic burdens by <ul style="list-style-type: none"> <li>o reduction of complexity in the use (less / no requirements for e.g. color, free space, size, R and TM use ....)</li> <li>o reduction of complexity in the use process (less approval burdens for "on product" and "off product" use)</li> </ul> </li> </ul> <p>=&gt; the draft includes no real reduction of requirements, nor provides a reasoning for requested requirements and possible ways to reduce it. E.g. the R/TM use is questioned to be necessary for brand protection. Legal advice says this is not necessary and done by the use. R/TM does not provide any added protection status. If R/TM is necessary for other reasons it is requested to make this transparent for a decision to stay with it or to find alternatives. The free space and size requirements can be evaluated for a decision if it would be enough to require just readability. Same with the color etc... =&gt; the draft proposes a self-approval procedure to reduce process burden. This is since many years already established by big companies with high logo use volume under the current standard. Of course it is nice to have it explicitly in, but there is no real change for improvement. It can be questioned if the approval process is really needed or if it is sufficient to check this as part of the audits. =&gt; What is also unsolved is the CAR situation. In the current process each "misuse" due to e.g. wrong color, size (we count halve millimeters) etc. results in a corrective action request (CAR). 3 CARS create a major CAR, which results if repeated in the loss of the certificate. A high risk taken into the frame of big companies like SIG with a huge multi-site certificate and 30 bn labeled products. Is this proportionate to the main risk areas of FSC ? Is this the critical element to place huge burden, uncertainty and frustration on the FSC system users / supporters ? =&gt; The current standard and the new draft requires certificate holders in each communication (also on ppt internally) to gain approval for each "FSC", tick tree or sentence about FSC. Is this something the membership sees value to punish the "willing to communicate FSC" companies and where FSC IC / CBs should spend time / money in ? Not addressed at all for decision.</p> <ul style="list-style-type: none"> <li>• The logo motion was rated by FSC IC as cost intensive arguing with the registrations costs when logo designs / wordings are changed <ul style="list-style-type: none"> <li>o The logo motion proposers in consequence made it very clear that new types of claims / wordings is not intended, as we than also open the Pandora's box of old discussions again, which would not be helpful at all.</li> </ul> </li> </ul> <p>=&gt; Surprisingly the current draft includes a discussion paper for new claims ..... I do not see a discussion on this as clever and useful.</p> <ul style="list-style-type: none"> <li>• The revision process and draft is lacking an evaluation basis for all the critical elements as mentioned above and an evaluation basis of consumer understanding of the present standard use. Without this basis no real improvement will be triggered neither for the logo promoters / user nor for the target</li> </ul>	

		group (consumer) of the label use. I therefore ask to evaluate these in a next step and start a new approach by considering the evaluation outcome while focussing on bureaucracy reduction.	
Introduction	E	It is essential that FSC is understood by the label use for the non expert consumers	Add this into the text
A scope	G, E	The scope of the standard does not reflect the core intention of motion 29. Current TM approvals shall be replaced by evaluation on sample basis during FSC audits.	1st paragraph last sentence, modification: This standard forms the basis for evaluation by FSC-accredited certification bodies of all certificate holders' use of FSC trademarks.
A scope	G, E	The scope of the standard does not reflect the core intention of motion 29. Current TM approvals shall be replaced by evaluation on sample basis during FSC audits.	1st paragraph last sentence, modification: This standard forms the basis for evaluation by FSC-accredited certification bodies of all certificate holders' use of FSC trademark.
A scope	G, T	Motion 29 had a far different core intent than what is presented here (as I recall from attending the GA). TM approvals should be replaced by sampling trademark use during audits by certification bodies.	1st paragraph, last sentence: This standard is the basis for evaluation by certification bodies of their certificate holders use of FSC trademarks.
A scope	G, E	The scope of the standard does not reflect the core intention of motion 29. Current TM approvals shall be replaced by evaluation on sample basis during FSC audits.	1st paragraph last sentence, modification: This standard forms the basis for evaluation by FSC-accredited certification bodies of all certificate holders' use of FSC trademark.
A scope	T	"Existing Stock" should be extended to include designs also. In printing for primary packaging, certain 'artwork' can be approved for a considerable period of time, years. Changing artwork can be very expensive	Suggest: "Existing stocks and designs 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."
A scope	T	The standard also replaces FSC-STD-50-001 V1	Add FSC-STD-50-001 V1 as a standard that is replaced
Part I: General requirements	G	I agree will all proposed changes, the simpler the better.	
Part I: General requirements	T	The timelines for phase in of a new trademark should be discussed in a transparent manner. The new standard has many new options that are great to see and will ultimately increase label use however the cost of changing labels and transition has not been fully considered by the working group or portrayed in any manner during this consultation. Label changes have a high cost especially which are present in full for engaged companies actively using the certification the most. The last trademark change occurred over a year and a half however many companies asked for and received exceptions as it takes a great deal of time when many label uses occur to change labels.	Include phase in/transition timelines as a consultation item. The rollout of the standard should have a planned and consulted timeline process so that the cost of transition for new labels is minimized for certificate holders and customers who want the label. Any change to labels and artwork represents a cost that certificate holders have to bear on their own to change with no benefit to the system. We propose that a transition such as the last trademark standard is used at a minimum where at least 18 months is given plus exceptions for companies having trouble switching to new label wording. Changing the label wording has very little meaning to the consumer and a high cost to the certificate holder. It is not clear that a change in label wording is warranted.
Part I: General requirements		to adequacy of FSC trademark on product that are applied through tools (flexible cliché) the deadline for adaptation to the new models should be the same as the useful life of the tool, due to high cost of these tools.	include consideration of the time of use of the tools to be the time to change labels
Part I: General requirements	G	Groundrules for using the trademarks	FSC checkmark-and-tree-logo

Part I: General requirements	G	None of the proposed changes to the Trademark Standard will provide a significant contribution to the goal to shift to FSC 100% over FSC MIX or encourage companies to phase out controlled wood. We invite you to revisit the letter submitted on 3 December 2014, signed by various environmental, social, and economic groups which lays out in steps 1-4 how to begin this transformation through implementing motion #47, communicating clearly the difference between 100% and MIX products, developing a strategy and schedule for promoting FSC 100%, and developing and driving market drivers for 100%.	N/A
Part I: General requirements	G	Overall I am concerned that an opportunity to simplify trademark requirements is being missed, which after all was the intent of GA motion 29, which I seconded.	
Part I: General requirements	G	The authorised placements of the labels remain vague while this is typically the kind of questions we get at the office. Maybe could we establish clearly what is not allowed and underline what is (especially and hopefully) newly accepted place! (If not, an internal document listing on the same page what has been accepted via derogation by the trademark team would be much helpful)	
Part I: General requirements	G	Could the standard be structured in such a way as to make it modular, e.g. with issues such as "Use of trademarks on business card" being a drop-down option	Consider modular approach to the standard
Part I: General requirements	E	Restriction on forth coming claims was omitted in 50-001. Organizations are required to follow this rule, that no forth coming claims about certification can be made, but it is not in writing.	Add this restriction to the revised standard.
1.1	G,T	Instead of one registered trademark FSC has now three slightly different marks. There is a clear risk that this results in confusion on the market and even in the situation, in which the new ones seem "better and more qualified" than the existing checkmark-and-tree logo. FFIF sees that instead of having three options, FSC should focus on and promote only one logo.	
1.1 c)	E	Words: 'Checkmark and tree' sometimes called FSC Logo. Eg 1.1 and 5.1 call the logo different things.	Rename and use consistently 'Tick Tree logo' or just FSC Logo but not checkmark and tree. Decide which and use only one terminology.
1.1, 5.1	T	Some important stakeholder observed that they would like to use Forest For All Forever: they really believe it can be an opportunity to better communicate their FSC-related commitment with consumers. To do that, the best choice would be having the FFF trademark somewhere else than the place where the product label is placed. Nonetheless, it may happen (and it actually happened!) that the only place available is close to the product label. In this case, they asked to have a Forests For All Forever trademark without the tick-and-tree logo, in order to avoid to display that logo twice in a very small and close product space/area. In fact, the FFF tick-and-tree logo would be a repetition of that already present in the product label. We FSC Italy NO think that it is very important FSC IC addresses this relevant issue.	It has been asked to have a Forests For All Forever trademark without the tick-and-tree logo, in order to avoid to display that logo twice in a very small and close product space/area. In fact, the FFF tick-and-tree logo would be a repetition of that already present in the product label. We FSC Italy NO think that it is very important FSC IC addresses this relevant issue.
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1.2	G	Contradiction with FSC FM requirements – clients applying for FSC certification are obliged to contact and communicate stakeholders regarding proposed FSC FM certification. How to communicate if they cannot use FSC initials and FSC name?	“Companies applying for FSC certification can use FSC initials and FSC name for communication with stakeholders ...”
1.2		How does “and hold a valid certificate” impact companies who have signed trademark agreements with national offices, but are not certificate holders (retailers, consultants, etc.)?	
1.2	G	The standard is only applicable to FSC certificate holders. But there is the casa of retailers that do not need to be certified to be able to get a trademark license.	The standard is only applicable to FSC certificate holders. But there is the casa of retailers that do not need to be certified.
1.3	T	Where is it stated otherwise that the licence code can be omitted?	Give example of when the licence code can be omitted where FSC Trademarks are used.
1.3	T, E	Including the FSC TM License code on every single use of the term “FSC” and “Forest Stewardship Council” is an unnecessary limitation to TM use and not in the sense of simplification. It should be restricted to TM Label use only.	Modified: The FSC trademark license code assigned by FSC should be included with all Label applications described in this standard, unless stated otherwise.
1.3	T	It is not relevant for trademark the addition of the license code every time that “FSC”, “Forest Stewardship Council” or other trademarks are used. This would go against motion 29, which calls for simplification on trademark standard. The addition of the license code is only relevant for the label use.	1.3. The FSC trademark license code assigned by FSC shall be included with all label applications described in this standard, unless stated otherwise.
1.3	T, E	Including the FSC TM License code on every single use of the term “FSC” and “Forest Stewardship Council” is an unnecessary limitation to TM use and not in the sense of simplification. It should be restricted to TM Label use only.	Modified: The FSC trademark license code assigned by FSC should be included with all Label applications described in this standard, unless stated otherwise.
1.3	T, E	Requiring businesses to use their FSC TM license code with every usage of the term “FSC” and “Forest Stewardship Council” is ridiculous. Does not meet the simplification requirement included in Motion 29. License code should be only required with the label.	Modification: The FSC trademark license code will be included with all Label applications described in the standard, unless otherwise stated.
1.3	T, E	Including the FSC TM License code on every single use of the term “FSC” and “Forest Stewardship Council” is an unnecessary limitation to TM use and not in the sense of simplification. It should be restricted to TM Label use only.	Modified: The FSC trademark license code assigned by FSC should be included with all Label applications described in this standard, unless stated otherwise.
1.3	G	What does “all applications mean” ?	Needs to be clarified.
1.3	T	It is not relevant for trademark the addition of the license code every time that “FSC”, “Forest Stewardship Council” or other trademarks are used. This would go against motion 29, which calls for simplification on trademark standard. The addition of the license code is only relevant for the label use.	1.3. The FSC trademark license code assigned by FSC shall be included with <u>all</u> label applications described in this standard, unless stated otherwise.
1.3	T, E	Including the FSC TM License code on every single use of the term “FSC” and “Forest Stewardship Council” is an unnecessary limitation to TM use and is not in the spirit of simplification. It should be restricted to TM Label use only.	Modified: The FSC trademark license code assigned by FSC should be included with all Label applications described in this standard, unless stated otherwise.

1.4	T, E	The use of the term "shall" shall be replaced by the term "should". The current wording puts users in unproportioned high risks to get certification suspended or withdrawn based on wrong artwork. Obliging the use of R and TM for the use of FSC and Forest Stewardship Council is unproportioned to the benefit it may bring to the system. It should be deleted.	Modification: The FSC logo and the Forests for All Forever marks should include trademark symbols ® or ™ in superscript font in the upper right corner. The symbol should be chosen on the basis of the registration status of the FSC trademark in the country in which FSC certified products or materials are to be distributed. Delete: The applicable symbol should also be added to 'FSC' and 'Forest Stewardship Council' at the first use in any text.
1.4	E	Why to create new restriction? Clients can use applicable symbols at all uses in the text. Does "any text" mean an individual article or the whole document? Using FSC initials as the menu item in the webpage (the first use) and then link to the full text. Shall be the menu item with ®/™ or only the following linked text using ®/™?	The applicable symbol shall also be added to 'FSC' and 'Forest Stewardship Council' at least at the first use in any text/document. Or the applicable symbol shall also be added to 'FSC' and 'Forest Stewardship Council' at least once in any text/document (preferably at the first use).
1.4	E	Define First use when used on a website; Is the registration symbol required at first use on each separate page of a website?	Define first use on websites.
1.4	G	Too much detail required for a use of a symbol. Only complicates the issue for those who want to use the FSC trademarks and those who have to approve it. This needs to be simplified.	The FSC logo and the Forests for All Forever marks shall include trademark symbols ® or ™.
1.4	G	Too much detail required for a use of a symbol. Only complicates the issue for those who want to use the FSC trademarks and those who have to approve it. This needs to be simplified.	The applicable symbol shall also be added to 'FSC' and 'Forest Stewardship Council' at the first use in any text, if the promotional logo is not present in the document.
1.4	G	You should have examples	E.g. Include the examples that FSC International gave on their training (documents called "Factsheet_Registration_symbol_o n_product" and factsheet_Registration_symbol_pr omotional").
1.4	T	symbol R or Tm should be always included in texts and not only the first time. First time often is not clear because the distribution or organization of the texts are not clear or simple	The applicable symbol shall also be added to 'FSC' and 'Forest Stewardship Council' always when use in any text.
1.4		"...The applicable symbol shall also be added to 'FSC' and 'Forest Stewardship Council' at the first use in any text." Clarify the use of FSC's trademarks in websites and social media, if the "first use" regards to every page of the website with FSC trademarks (first use) or the first page?	Include a NOTE clarifying
1.4	T	Some consultants asked for a clarification, i.e. whether and TM symbols should be placed in internal documents too, or not. On the other hand, during the discussion it has convened that in business-to-business documents symbols do have to be placed, as such communications involve Entities that are external to the CH environment. Nonetheless, a confirmation on this issue would be gladly appreciated.	Give clarification/confirmation.
1.4	T, E	The use of the term "shall" shall be replaced by the term "should". The current wording puts users in unproportioned high risks to get certification suspended or withdrawn based on wrong artwork. Obliging the use of R and TM for the use of FSC and Forest Stewardship Council is unproportioned to the benefit it may bring to the system. It should be deleted.	Modification: The FSC logo and the Forests for All Forever marks SHALL include trademark symbols ® or ™ in superscript font in the upper right corner. The symbol shall be chosen on the basis of the registration status of the FSC trademark in the country in which FSC certified products or materials are to be distributed.

			Delete: The applicable symbol should also be added to 'FSC' and 'Forest Stewardship Council' at the first use in any text.
1.4	T	Some consultants asked for a clarification, i.e. whether © and TM symbols should be placed in internal documents too, or not. On the other hand, during the discussion it has convened that in business-to-business documents symbols do have to be placed, as such communications involve Entities that are external to the CH environment. Nonetheless, a confirmation on this issue would be gladly appreciated.	Give clarification/confirmation
1.4	T, E	Please provide information how FSC is protecting its trademarks and evaluate how this can be done without adding the bureaucracy level of mandatory using the right TM or R for the label users	Find ways to take this requirement out.
1.4	T, E	The use of the term "shall" shall be replaced by the term "should". The current wording puts users in unproportioned high risks to get certification suspended or withdrawn based on wrong artwork. Obliging the use of R and TM for the use of FSC and Forest Stewardship Council is unproportioned to the benefit it may bring to the system. It should be deleted.	Modification: The FSC logo and the Forests for All Forever marks SHALL include trademark symbols ® or ™ in superscript font in the upper right corner. The symbol shall be chosen on the basis of the registration status of the FSC trademark in the country in which FSC certified products or materials are to be distributed. Delete: The applicable symbol should also be added to 'FSC' and 'Forest Stewardship Council' at the first use in any text.
1.4	T	Addition of © to FSC or Forest Stewardship Council at first use in any text is found highly annoying.	Deletion
1.4	T	The requirement that the trademark symbols has to be used at the first use in any text leads to a lot of mistakes by certificate holders and comments on this creates bad will for FSC which is seen as too bureaucratic and focused on unimportant details instead of important issues. The use of trademark symbols in text makes the impression of FSC being a bit out-dated and old stylish. We don't see any other environmental or social labelling schemes enforcing this. As there are so many mistakes in the use of the trademark symbols, and the standard is not enforceable, this is not a protection for the FSC name.	Take away the requirement for using trademark symbols in all texts.
1.4		Evaluation of the legal requirement whether a TM protection symbol need to be used. Also there should be transparency on the approach how FSC is protecting it's TM. First this basic information should be clarified before rules are written into a standard. The target should be to find the simplest possible provisions for the use of the FSC TM. The legal base and the strategy on TM protection should be made public.	
1.4	T	Some consultants asked for a clarification, i.e. whether © and TM symbols should be placed in internal documents too, or not. On the other hand, during the discussion it has convened that in business-to-business documents symbols do have to be placed, as such communications involve Entities that are external to the CH environment. Nonetheless, a confirmation on this issue would be gladly appreciated.	Give clarification/confirmation
1.4		Evaluation of the legal requirement whether a TM protection symbol need to be used. Also there should be transparency on the approach how FSC is protecting it's TM. First this basic information should be clarified before rules are written into a standard. The target should be to find the simplest possible provisions for the use of the FSC TM. The legal base and the strategy on TM protection should be made public.	

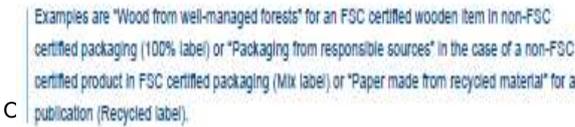
1.5		How about multi-site? Merging of multi-site and group certificate into one document (FSC-STD-40-003) does not mean there is no longer multi-site certificate. Besides, the title of Annex 2 still has multi-site in it.	Holders of group, multi-site or project certificates shall refer to Annex 2 for additional requirements for the use of the FSC trademarks.
1.5, Annex 3 -1.5	T	Demonstration of competence should be part of the training requirement in 1.4. This section is redundant and complicates the standard. It is also unclear whether the organization is qualified through 1.1, or the designated person responsible for trademark approvals within the organization is qualified.	Language in sections 1.1, 1.4 and 1.5 should be aligned and clarified.
1.6	G	An approval of TM "FSC" and TM "Forest Stewardship Council" use shall not be subject to an approval. This requirement has no benefit to the system and the administrative burden is unproportioned.	
1.6	T, E	This clause does not reflect the core intention of motion 29. Current TM approvals and self approvals shall be replaced by evaluation on sample basis during FSC audits, by trained CB auditors.	Deletion
1.6	E	Clause refers to the certification body.	The organization shall submit all intended uses of FSC trademarks to their certification body.
1.6	G	I cannot imagine clients applying for certification to submit intended use for approval	Remove solely use of FSC initials and/or FSC name from this requirement. (FSC claim is not intended for approval as well)
1.6	G	I think that CB must control each trademark use , unless the organization uses the same label/trademark on the same product with the same placement. Self-approval can generate the distribution of wrong labels.	Do not modify point 1.16 of FSC-STD-50-001_v1
1.6		Specific cases to exempt new approval each use : - reprint - Packaging with the same art but different flavor e.g. lemon , orange. - magazine / newspaper which the application is the same, but changes the content of the product ( ex-weekly , daily newspaper )	Include a NOTE clarifying for specific cases
1.6	G	(1) CBs should not need to take responsibility in approving all the trademark use of CHs, as it is not their core business activity. (We employ 1/2 person just for approving FSC trademark at our own costs.) (2) CBs can check the trademark use of CHs during each audit, but CHs (or FSC trademark officer) should be responsible for trademark use approval. (3) When nonconformities are found for trademark use, CHs may be required to submit trademark use to CBs for approval. That may be acceptable. (4) We encounter many CHs actually avoid using new FSC trademarks on their products due to "prior application" process. Simplification of trademark use approval is a must for FSC expansion.	The organization shall be responsible for internally approving its trademark use. The organization can consult with the certification body and/or FSC trademark officer for correct use of FSC trademarks. Or, the organization shall submit all intended uses of FSC trademarks to FSC trademark officer for approval.
1.6	T	The self-approval scheme is very good and would help a lot to decrease administrative burden for trademark use.	No changes
1.6	T, E	This clause does not reflect the core intention of motion 29. Current TM approvals and self approvals shall be replaced by evaluation on sample basis during FSC audits, by trained CB auditors. THIS ASPECT IS VERY IMPORTANT AS IT IS VERY DIFFICULT TO GET EACH USE OF FSC TRADEMARK APPROVED.	Deletion
1.6	G	An approval of TM "FSC" and TM "Forest Stewardship Council" use shall not be subject to an approval. This requirement has no benefit to the system and the administrative burden is unproportioned.	
1.6		What are the costs and effort for the Global-Development Training	

1.6		It should be possible to use the general label without approval of the certification body. The rules are very detailed, so it's easy to create and place the label in the right way.	
1.6	G	We support the ability to self-approve labels. This is helpful for managing requests within a large multi-site organization.	No changes.
1.6	G	An option for self-approval is a big advantage for the license holders and particular in the printing industry with decreasing production times	
1.6	G	There should be no option for self-approval status	Delete the phrase "unless it has a valid self-approval status..."
1.6	T, E	This clause does not reflect Motion 29. Current TM approvals and self approvals should be replaced by evaluations during FSC audits by CBs	Deletion
1.6	G	Do not require approval of TM for "FSC" and TM "forest stewardship council" as this is truly a pain and limits the use of the terms by various companies in documents, advertisements, etc that need to go out quick.	Should not be required.
1.6	T, E	It is not understandable that FSC puts more efforts and energy in the 100% perfect trademark use by checking each activity but leaves the core points at a once per year audit level. Therefore trademark use should be at least treated the same way by just verifying in the audits that the use was correct.	Change the 1.6 to a way that correct trademark use is part of the yearly audits as the other requirements in COC and FM. Establish separate Trademark CAR routine which is less restrictive that for the really critical points in COC and FM
1.6	T	At present CH need to send each "FSC" letter use, let it be in ppts or other internal communication to the CBs for approval.	Delete this necessity
1.6	T	Today FSC supporters are censored when FSC critical charts (improvement potentials, lacks, risks) are created for FSC events as they will not receive approval by CBs which are requested to check and non-approve this. NGO's which are no CH can say what they want. Is this the spirit of FSC what FSC wants to have ?	Change this rule.
1.6	T, E	This clause does not reflect the core intention of motion 29. Current TM approvals and self approvals shall be replaced by evaluation on sample basis during FSC audits, by trained CB auditors.	Deletion
1.6	G	An approval of TM "FSC" and TM "Forest Stewardship Council" use in any text shall not be subject to any approval by CB's or FSC. This requirement has no benefit to the system and the administrative burden is unproportioned.	
1.6	T	The self-approval scheme is very good and would help a lot to decrease administrative burden for trademark use.	No changes
1.6	G	The self-approval system gets broad support.	
1.6	G	Self approval: some CB's already offer this possibility; if a CH already has successfully passed the self approval training programme of the CB does the outcome remain valid once the new standard is approved?	Confirm that already granted permission for self-approval remains valid.
1.6	G	Does the self-approval system also apply to group members (that is companies in a group certificate)?	
1.6	T	If a CH produces only one (FSC-certified) product, does this CH still need to submit (at least) three consecutive correct approval requests?	
1.6	G	Great initiative with self-approval!	
1.6	E	Remove "intended", it must be better to know what is done and not what is only planned.	Remove "intended",

1.6		In general a variation should be possible, that the use of the FSC TM is possible without approval, but based on a monitoring of the performance of the CH through an audit. In case of incompliances a CAR is issued based on the evaluation and allowed discretion of the CB. Alternatively it would be welcomed if incompliances do not result instantly in hard measures, but in an agreement that in future the rules will be implemented. Incompliances should not be treated on the level than incompliances in relation to other core normative rules (especially this is important in the FM area comparing the relevance of TM rules and the FM standards). Supplementary it would be useful if the TM rules would be more simple and this might be a pre-requisite to eliminate approvals.	
1.6		If companies would want to work voluntarily on the mode of approvals: It is suggested to establish a centralized approval service that is highly available and works fast. Such approvals should be binding and should be independent of the respective CB.	
1.6		There should be no controls and no approval requirement for internal communication and internal use of the FSC TM.	
1.6		Implementation of generic approvals and inclusion of such an option in the TM standard, for instance for regular uses or group schemes.	
1.6	T	To submit all intended uses of FSC trademarks, if it means, for example, to submit each weekly catalogue with FSC certified products is not efficient. Weekly catalogues are prepared with very tight timelines to be able to include a submission to the certification body and wait for its response.	I would propose to submit all certified products claims to be verified by the certification body, but once those products are validated, to be able to include them in catalogues, with the correspondent FSC claim without need of submitting it each time.
1.6	G	An approval of TM "FSC" and TM "Forest Stewardship Council" use shall not be subject to an approval. This requirement has no benefit to the system and the administrative burden is unnecessary.	
1.6		In general a variation should be possible, that the use of the FSC TM is possible without approval, but based on a monitoring of the performance of the CH through an audit. In case of incompliances a CAR is issued based on the evaluation and allowed discretion of the CB. Alternatively it would be welcomed if incompliances do not result instantly in hard measures, but in an agreement that in future the rules will be implemented. Incompliances should not be treated on the level than incompliances in relation to other core normative rules (especially this is important in the FM area comparing the relevance of TM rules and the FM standards). Supplementary it would be useful if the TM rules would be more simple and this might be a pre-requisite to eliminate approvals.	
1.6		If companies would want to work voluntarily on the mode of approvals: It is suggested to establish a centralized approval service that is highly available and works fast. Such approvals should be binding and should be independent of the respective CB.	
1.6		There should be no controls and no approval requirement for internal communication and internal use of the FSC TM.	
1.6		Implementation of generic approvals and inclusion of such an option in the TM standard, for instance for regular uses or group schemes.	

1.6, Annex 3	T	We are completely against the idea of allowing self-approval. In fairness, this pushes the responsibility of correctly interpreting the FSC Standards from Certifying Bodies to Certificate Holders, and while it would result in a streamlining of artwork approvals etc, the risk of inappropriate use of the trademark is high (including associated text and accompanying copy) and the cost of remedying any resulting corrective actions is too high (e.g. updating artwork plates etc).	Remove self-approval as an option.
1.6, Annex 3	T	<p>A strength of the FSC brand is that 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.</p> <p>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.</p> <p>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.</p> <p>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 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.</p>	<p>The organization shall submit all intended uses of FSC trademarks to the certification body for approval. (removal of all reference to self-approval status). In Annex 3 remove clauses 1,2,3 in their entirety.</p> <p>At the very least remove any reference to Groups from clause 1.3.1. If this section does remain, then the self approval status should not apply to Groups, only to Multisites.</p>
1.6, Annex 3	G	From our perspective it is not clear what the difference is between current blanket approval set up via certification bodies and the new term "self-approval"	Clarify the difference, if there is any difference?
1.6, Annex 3	G	This section is redundant and just adds language to the standard, without added value.	Eliminate clause 3.3
1.6, Annex 3	G	Feedback from the information meeting's participants and from stakeholders during the last years in general reveal that this option is very much welcomed and requirements seems fair and workable.	

1.6, Annex 3-1.3	E	The Annex is overly complicated. Individual sections do not align in all cases. It appears that although self-approval is being offered, the writers do not really have confidence that organizations are capable of performing this task. The language is very prescriptive, and includes multiple opportunities for FSC and CBs to suspend or terminate self-approval status. If the process of qualifying for trademark self-approval is overly complicated, organizations will opt out.	Suggested simplified language: 1. An organization may designate individuals to be qualified to self-approve trademark use for a) on product 100%, b) on product MIX and c) on product Recycled as well as d) promotional use. 2. Trademark self-approvers shall be trained using FSC or CB developed training. Training shall be documented. 3. The organization will notify the CB in writing who the qualified trademark self- approvers are, and maintain a list of self-approvers in the Documented Control System. The organization will notify the CB when the list of self-approvers changes. 4. Organizations have the option of requesting the CB approve trademark use, even if they have qualified self-approvers. 5. Any corrective action request related to FSC-STD-50-001 in an audit or during the audit period will lead to immediate termination of self-approval status by the CB until the corrective action is addressed and closed.
1.6, Annex 3-2.1	G	An organization should have the option of qualifying more than one individual to approve trademark use. Approvals are often required on short notice, so back-up in case of vacation, illness, or unavailability of the primary approver is desirable.	Allow more than one trademark approver to be qualified within an organization.
1.6, Annex 3-3.1	G	It is unclear why after requirements established in section 1 are met, the CB will still have discretion concerning whether or not to grant self-approver status.	The roles of the organization, the CB and FSC in the process of qualifying for and granting self-approver status should be clarified. i.e. who will provide the training? How will the training and designated approver(s) be documented? Under what conditions could a CB deny self-approver status to a trained person within an organization?
1.6, Annex 3-3.3	G	It is unclear what process would be used to communicate a change of the person responsible for self-approval.	Training information should be available from the CB or FSC, and a previously qualified organization should be able to train and qualify a new trademark self-approver. If necessary, the name of that successor should be communicated to the CB. See comments above for 2.1
1.11 (old)	G	The organizations use wrong information about FSC quite often. The CB should always verify the accuracy of the additional information related to FSC.	Do not remove point 1.11 of of FSC-STD-50-001_v1
1.11 (old)	T	This clause has been removed in the new std; however if not approved the CH could use not correct messages to describe FSC certification and / or products	Keep the clause as in the previous version of the standard
Part II: Using the FSC labels on products	G	Don't agree to have 2 standards to be followed – not practical to use and approve. Only creates more possibilities of misuse	Define all requirements only in 1 document.
Part II: Using the FSC labels on products	E, G	Label generator is now called Trademark Portal. Use this opportunity to remind CH that they can reset the password themselves and don't need to contact CB for that purpose.	Be consistent with terminology.

2. Restrictions	T, E	Take down unnecessary restrictions and focus on the most important musts: - easy to understand – no misuse – clear link to certified product	Reformulate the paragraph using the must points. Delete b, c,d,e
2. Restrictions	E	Existing 1.13 "The FSC trademarks can be used to describe the certification of the products" has been removed.	Addition: The FSC trademarks can be used to describe the certification of the products
2. Using labels on products	T	Several companies misuse their FSC COC certification to imply all the wood they use is FSC certified	Add to 2.1 2.1. The FSC trademarks shall not be used" : (f) that implies certification of the wood material use when mentioning that the facility has merely Chain of Custody certification
2.1	E	"...controlled material or FSC controlled wood;" RA proposes to capitalize the term to "FSC Controlled Wood" to maintain consistency across FSC CW standard.	"...FSC Controlled Wood"
2.1	E	Clause 1.11 has been removed. Does this mean approvers no longer have to check additional text about FSC?	Clarify what is expected of the trademark approver when there is lengthy text about FSC.
2.1		Clarify and exemplify : endorses, in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme	Clarify and exemplify
2.1	G	This clause is still confusing and the examples from the old standard have been removed for some of the individual items. Can examples be placed here to highlight what is not allowed and how a company can highlight their certified products and certification position. It needs to be clear that brands are allowed to carry a certification and that we just have to talk about the certification in an independent way from the brand. Other examples of items within these restrictions and how they are treated should be considered so that interpretations do not need to occur in the future.	An example like this would work: "Super Awesome Paper" an FSC certified product is allowed compared to "Super Awesome FSC Paper"
2.1	E	Existing 1.13 "The FSC trademarks can be used to describe the certification of the products" has been removed.	Addition: The FSC trademarks can be used to describe the certification of the products
2.1 d)	T	Text allowing to use FSC trademarks to describe the certification of the product has been dropped out. This need to be in place as there are special agreements with FSC how to use FSC trademark in connection to brand names and these agreements are based on this dropped part of the text.	2.1. FSC Trademarks shall not be used d) in product brand names, company names, or website domain names, but the FSC trademark can be used to describe the certification of the product: For example , a product may not be named 'Golden FSC Timber' instead 'FSC™ certified Golden Timber' or 'Golden Timber – FSC™ certified' must be used. Or if not added to 2.1 d) then somewhere else to the standard.
2.1 (old)	T	Participants observed that the example under the main Clause (see image below) should be maintained.   C e. ... example would not be allowed anymore. All stakeholders objected to this hypothesis.	- All stakeholders objected to the hypothesis that the declaration provided in the example would not be allowed anymore. The example should be maintained - Disregard of whether the main Clause will be maintained or not, it should be clarified whether the example will be still valid, or not. Possibly, the description provided in the example might be restricted to those products/product lines only produced and sold with FSC claims.

2.1 (old)	T	<p>Participants observed that the example under the main Clause (see image below) should be maintained.</p> <p>Examples are "Wood from well-managed forests" for an FSC certified wooden item in non-FSC certified packaging (100% label) or "Packaging from responsible sources" in the case of a non-FSC certified product in FSC certified packaging (Mix label) or "Paper made from recycled material" for a publication (Recycled label).</p> <p>The example would not be allowed anymore. All stakeholders objected to this hypothesis.</p>	<p>- All stakeholders objected to the hypothesis that the declaration provided in the example would not be allowed anymore. The example should be maintained</p> <p>- Disregard of whether the main Clause will be maintained or not, it should be clarified whether the example will be still valid, or not. Possibly, the description provided in the example might be restricted to those products/product lines only produced and sold with FSC claims.</p>
2.1 (old)	T	<p>Participants observed that the example under the main Clause (see image below) should be maintained.</p> <p>Examples are "Wood from well-managed forests" for an FSC certified wooden item in non-FSC certified packaging (100% label) or "Packaging from responsible sources" in the case of a non-FSC certified product in FSC certified packaging (Mix label) or "Paper made from recycled material" for a publication (Recycled label).</p> <p>The example would not be allowed anymore. All stakeholders objected to this hypothesis.</p>	<p>- All stakeholders objected to the hypothesis that the declaration provided in the example would not be allowed anymore. The example should be maintained</p> <p>- Disregard of whether the main Clause will be maintained or not, it should be clarified whether the example will be still valid, or not. Possibly, the description provided in the example might be restricted to those products/product lines only produced and sold with FSC claims.</p>
2.1 d)	G	Regarding the change to requirement 1.13 where the language "The FSC trademarks can be used to describe the certification of the product" has been removed. Does one still need to submit instances, such as mentioning FSC certification on our website, stock item books, or product specification sheets, for approval?	
2.1 e)	G	"sales and shipping documentation" should include also segregation marks (which are not allowed to reach the endconsumer/final point of sale). We don't see any risk that FSC CW with such marks (including the initials FSC) constitutes any danger to integrity or credibility of the FSC system if the "FSC" is only used between certified companies for segregation means on material that will be manipulated/changed any way. In fact, a higher degree of clarity in transport and storage may be achieved by allowing "FSC" on bale, reel or pallet sheets.	"...the initials FSC shall only be used in the communication between certified sellers and certified buyers of FSC Controlled Wood to identify the status of FSC Controlled Wood material. The initials FSC shall not be used in connection with finished products or end consumer communication".
2.1 e)	G	As companies adopt sourcing policies that they will only source at a minimum FSC CW and have public goals of sourcing from actual forestland they should be allowed to talk about those goals. This section of the standard should be removed as it establishes a transparent baseline that companies should be able to state. As FSC wants to meet legality standards and EUTR requirements by stating that they have a component of legality not allowing controlled wood sourcing terminology to be used publically makes companies trying to perform due diligence difficult. Companies should be allowed to talk publically about the good that this standard causes. The other certifications do not limit promotions on controlled material or descriptions of what that certification brand risk mitigation standard requires publically. Companies should be allowed to describe what they are doing publically.	Allow public sourcing claims of sourcing controlled wood either FSC Controlled Wood or Controlled Material to be made. Allow companies to make public claims about what the risk assessment process or CW process is and how their company publically meets these FSC CW process. This is an important process that FSC assists.
2.2	E	"...translation may be included in brackets after the name." Please clarify if this is meant as [brackets] or (parentheses)	"...translation may be included in parentheses after the name."
2.2		Exemplify Forest Stewardship Council (translation)	
2.2		Name FSC shall not be translated – good	None
2.3	T	This is sometimes impossible.	Please delete this point
3 – 4.3	G	Shall in my opinion is preferred instead of should.	

3. Selecting label		Three labels model	One label model
3. Selecting label	T	In the consultation regarding pre and post consumer accounting in FSC material, NGOs, including WWF, recommended the possibility for companies to explicitly report on the percentage of post consumer content if they wish, as this is required in some countries public procurement policies. It is suggested to add it to the communication possibilities	Add the sentence in bold in the point under Moebius Loop": - 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, or pre and post consumer separately if needed, which can be substantiated either through internal procedures or information from the supplier based on their chain of custody processes.
3.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Delete: Text claims may be made only in addition to an on-product label.
3.1	E	The word 'it' could relate to other things..	Replace 'it' with 'the product'
3.1		Explain scope	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 it has been supplied with or is qualified for according to its scope. Text claims may be made only in addition to an on-product label.
3.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Delete: Text claims may be made only in addition to an on-product label.
3.1	T, E	This is a silly limitation to TM use and does not meet the simplification requirements requested at the 2014 GA.	Delete the phrase – text claims may be made only in addition to an on-product label.
3.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Delete: Text claims may be made only in addition to an on-product label.
3.1	G	Whenever the full label text is the only element differentiating between product categories (Controlled Wood, Recycled, 100% certified), it should be an obligatory requirement rather than a voluntary requirement. (see discussion paper comments on next page)	The organization shall use the full label with all elements in order to differentiate between FSC product categories.
3.1	E	Delete "on the basis of the FSC claim it has been supplied with or is qualified for" as this should be superfluous and could cause confusion.	Delete "on the basis of the FSC claim it has been supplied with or is qualified for"
3.1	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Delete: Text claims may be made only in addition to an on-product label.
3.1, 3.4	T	There are certain products which never allowed on product label (even mini label) to be applied purely for design reasons. Some examples are CD jackets. For an artists, pictures on the jackets are very important. Pictures cannot be disturbed by any labels. Only the exceptions are texts at the bottom. Similarly, any products with care to its designs may not want any other designs (including FSC labels) to interrupt their design. In order to make it easier for CHs to promote certified products with FSC trademarks, we should think of a way to make text claims possible instead of prohibiting text claims.	When making on product text claims instead of using on product labels, organisation shall meet the general requirements as well as on product label requirements specified in Part I and II of this standard.
3.2	G	I would appreciate if there was only a single label. The result would be a clear system for certificate holders and, above all, for final customers. In fact, today customers are not aware of the difference between mix and 100% or recycled. This creates only confusion.	Keeping only 1 label and leaving the text of the label voluntary

3.2	G	<p>The options presented in the On-product label discussion paper (FSC-DIS-50-003-EN) offer a very insignificant improvement to representation and label meaning. I urge FSC to consider the cost implications of making proposed label changes on the certificate holders.</p> <p>Boise Paper currently offers 78 individual skews or paper products that carry FSC logos. The estimated cost to modify the design plates for these 78 individual product packages is \$468,000. This cost only includes plate changes. Additional costs for managing packaging inventories and planning are not included. The cost to implement is simply too large for the very small benefit received from new logo verbiage.</p> <p>The likely outcome, if FSC proceeds with the proposed draft is that certificate holders will block out the logos on existing plates and discontinue the use of FSC logos on product packaging. Businesses need consistency and predictability to remain competitive in the marketplace.</p> <p>To remain effective, FSC needs to consider another alternative, which is "no change" to on-product logos. The understanding of the meaning of current logos can be improved with targeted marketplace communication.</p>	
3.2	G	We do not support label changes that do not provide clear and meaningful value. Refer to "Comments about Discussion Paper."	Retain current labels and label text.
3.2	T	<p>If this change regarding on-product label will be confirmed, an organization shall change all printing plates (at least for all FLEXO-Printer) and this means:</p> <ul style="list-style-type: none"> <li>- a big impact for organizations;</li> <li>- costs for changing printing plates will be very huge;</li> <li>- even if will be provided a long transition time, the costs will be there;</li> <li>- from an environmental point of view, the change of print plates means more plastic and more wastes generated.</li> </ul>	No changes regarding on-product labels. Maintain the currently labels.
3.2	G	If the goal of the change is to clarify the claims, it falls short.	
3.3.1 (old)	T	Evergreen Packaging supports FSC's proposed change to remove the package size limitation (500 ml) for the mini FSC label. We struggle with brands to include the FSC logo on their packages and find that package real estate is valuable. Brands may not want to commit the space to the full size FSC logo and the proposal to allow a smaller logo option could increase the probability that brands will utilize the FSC logo.	
3.4	G	RA supports expanding the use of the MINI label to be at the discretion of the CH.	
3.4	G	I think removing the restrictions on using the mini labels will increase logo usage by certificate holders. Good move.	
3.4		The mini-label should be only used when there's a restriction as requirement 8.7	
3.4	G	This simplification is very good for license holders in the printing industry as well as for the customers that prefer a simpler layout of the label.	
3.4	T	Size, design, and look all weigh into customers decisions to place the label. Allowing small space elements and the use of reduced elements at any time is a step in the right direction for FSC.	Keep the proposed wording and allow for the mini label to be the default label option.
3.4	G	Great change. I'm glad to see relaxation of the logo use rules around the mini label.	No change.
3.4	G	Great change. I'm glad to see relaxation of the logo use rules around the mini label.	No change.
3.4	G	Agree with optional use of the standard or mini logo. Occasionally customer content on primary packaging can make it difficult to 'fit' the FSC label in. Packaging supplied in Aus especially (EU similar) requires a lot of information to support the validity of the content and packaging.	
3.4	T	All stakeholders approved this proposed change. Nonetheless, the final standard should be better describe which are the elements of the label, as for clauses 3.2 and 3.4 of the current standard version.	The final standard should be better describe which are the elements of the label, as for Clauses 3.2 and 3.4 of the current standard version.

3.4	T	All stakeholders approved this proposed change. Nonetheless, the final standard should be better describe which are the elements of the label, as for clauses 3.2 and 3.4 of the current standard version.	The final standard should be better describe which are the elements of the label, as for Clauses 3.2 and 3.4 of the current standard version.
3.4	G	As we are strongly in favour of keeping the distinction between pure and mixed products we would be very concerned if certificate holders could undermine this distinction in the market place by choosing only to use the mini-label option. We would be willing to add this flexibility only in the case of FSC pure products but for FSC mixed products it should only be allowed when the product is very small.	The section should be changed so as not to allow organizations to choose whether to use the full label or the min-label. Use of the mini-label should only be allowed when the product is small and FSC 100%, per the current standard.
3.4	G	The distinction between pure and mixed products must be clear in the marketplace. As such we oppose the proposal that would allow certificate holders to use a mini-label option at their discretion.	Amend this section to be consistent with the current standard, which only allows certificate holders to use the mini-label when space is limited.
3.4	E	This is the first mention of the "mini-label with reduced elements." The previous standard provided information on the required elements of the mini-label in its Clause 3.4, laying out which information must be shown in this label. These required elements are missing in the Draft FSC-STD-50-001 (V2-0), leading to an unclear expectation for the mini-label.	Re-introduce the text from the current standards document, Part II; Clause 3.4. "The required elements for the mini label are: FSC logo/Label title/(Product type, if required)/FSC trademark license code"
3.4	G	Assuming that the mini-label referred to here is the same as that in the current standard, we wonder why this option is being made available. If there is a business reason that this option has been proposed, we invite additional information. Otherwise, this seems like a license to never use the full label.	Edit this section to reflect the size requirements for using the mini-label as laid out in the current standard, rather than allowing blanket choice on the option across all products. Or, provide additional reasoning for this switch or some sort of safeguard to prevent the loss of the full label.
3.4	T	Amend so as not to allow organizations to choose whether to use the full label or the min-label. Use of the mini-label should only be allowed when the product is small, per the current standard.	
3.4	T	All stakeholders approved this proposed change. Nonetheless, the final standard should be better describe which are the elements of the label, as for clauses 3.2 and 3.4 of the current standard version.	The final standard should be better describe which are the elements of the label, as for Clauses 3.2 and 3.4 of the current standard version.
3.4	G	The required elements for both the full label and mini label should be laid out in the standard. If the required elements are not specifically listed, there is a potential for confusion and inconsistent interpretation. Please see more detailed comments on mini label use below.	Suggested addition: Clearly state which label elements are required and which are optional for both the full and mini labels.
3.4		This is a welcome change. Be aware that almost everyone will begin to use the mini label and the reduction in hassle it represents.	
3.4	T, E	Use of the mini-label should only be allowed when the product or the available space is small, per the current standard.	Amend so as not to allow organizations to choose whether to use the full label or the mini-label except when space is an issue.
3.4		The American Forest & Paper Association (AF&PA) supports FSC's proposal to allow organizations to choose whether to use the full FSC label with all elements or the FSC mini-label with reduced elements. Consumer products brands find that space for labels on packaging is extremely valuable. Some brands may not want to devote the space required to put the full FSC label on their package. Allowing organizations to choose whether to use the mini-label or the full label will give them flexibility to fit the label to their package in a way that makes the most sense for each packaging situation. In addition, it will increase the likelihood that brands will use an FSC label.	

3.4, 8.8	G	<p>“mini-label with reduced elements” must be more clearly defined. For those who are familiar with the current standard, it makes sense. But for a new comer to FSC, the term mini-label must be defined here (i.e. which elements are reduced from full label).</p> <p>And the fact standard and mini labels can be gained from label generator should be included here so that CHs do not have to worry about elements they need to include in labels.</p>	<p>The term “mini-label” must be more clearly defined in the standard. (Clause 3.4 of the current standard)</p> <p>When I say “define”, I do not mean include the definition in Annex 4, but include the definition in the body of the standard.</p>
3.5	E	Too many uses of the word or.	Only the FSC label artwork provided by the label generator or otherwise issued and approved by the certification body or FSC shall be used.
3.5	T	otherwise issued is confusing, how are trademarks otherwise issued	Deletion
3.5		Include the link to label generator	3.5. Only the FSC label artwork provided by the label generator (LINK TO LABEL GENERATOR) or otherwise issued or approved by the certification body or FSC shall be used.
3.5	T	Label-Generator should be extended by Extra-Logo	Wording “or otherwise issued” could be deleted if label-Generator was extended
3.5		Technical improvement of the label generator to allow the elaboration of all regular art work variations. Also improved accessibility of the stand-alone logo files (This is a technically unfortunate solution).	
3.5	E	Product types should always be required, instead of singling out printers or ‘confusing’ uses. All or nothing.	Product type shall always be used with the FSC label.
3.5		Technical improvement of the label generator to allow the elaboration of all regular art work variations. Also improved accessibility of the stand-alone logo files (This is a technically unfortunate solution).	
3.6	G	Needs clear clarification on what you mean with “For other products, the product type shall be used unless all materials of the product and its packaging/content are covered by FSC certification.”	Clause 2.2 of the current standard is better.
3.6	E	FSC-certified, FSC-labelled	Remove hyphen and be consistent throughout all parts of the Standard.
3.6	E	Covered by FSC Certification. This could be deemed to include Controlled Wood.	Clarify by adding other than FSC Controlled Wood items.
3.6	G	Product type shall always be used. If a certified company produces for example FSC certified cardboard packages of a game, they will not know about the other contents of the game (instruction manual, cards, dice etc). If the cardboard box as permanent part of the finished product on sale (not simple “packaging”) carries a label without product type, it will appear as if the entire content of the box is certified while the game publisher in fact purchases the other contents from non certified suppliers. – This might require easy addition of product types (3.7).	Product types shall always be used within product labels.

3.6		Clarify. It's isn't clear if packaging is printed material to this rule. If packaging doesn't have the label, will the audit has to prove the certified origin to justify the seal without the type of product in the certified product ?	Clarify or delete it
3.6	T	It should be possible to insert more than one product type in cases where contents as well as packaging shall be labelled, but double labelling is not intended due to space and layout reasons.	It is possible to insert more than one product type.
3.6	E	Content not understandable	Please redraft in a understandable manner
3.6	G	Needs a definition of "printed material" – e.g. could packaging and beverage cups	Needs to be clarified
3.6	T	The use of product type inside the label is not always the best way to explain to the consumer which part of a labelled product which is FSC-certified. Therefore it would be better to make product type within the label optional when a describing text would give a clearer description.	Open up for use of a describing text in conjunction with the label.
3.6	E	Product type should always be included unless the entire product, including the packaging, is certified. This decreases the potential for confusion about which part of the product/packaging is certified.	Don't specifically name "printed pieces" in the clause. Change the clause to read: Product type shall always be used unless all material of the product and its packaging/content are covered by FSC certification.
3.6		Stop making rules with exceptions built in. Why are printed materials so different than other materials?	Product type shall always be used within product labels on FSC-certified products, unless all materials of the product and its packaging/content are covered by FSC certification.
3.6, 3.7	G	1. Including product type complicates the process of on product labelling and does not add value. A company with multiple products will have to build system to label multiple products based on the product name in the label. This adds cost and complexity, and increases the potential for errors. As stated in 3.7, a potential list of products is subject to expansion. An undefined process requiring FSC to approve new products adds complexity, when FSC's stated goal is to "streamline the normative framework" (See Strategy Critical result area 1.1.	Eliminate the draft requirement to put product type in the label.
3.6, 3.7		Evaluation and revision in the consumer perspective of the use and appearance of the use of the product types within the label. Expansion of the product type list (e.g. "content") and option to use more than one product type in one label. Clarification of rules to display the product type in specific situations – which get more and more frequent – such as certified main product in a certified packaging.	
3.6, 3.7		Evaluation and revision in the consumer perspective of the use and appearance of the use of the product types within the label. Expansion of the product type list (e.g. "content") and option to use more than one product type in one label. Clarification of rules to display the product type in specific situations – which get more and more frequent – such as certified main product in a certified packaging.	
3.7	G	The process of request is too long and too complicated to fit the way of doing business in 21 century.	
3.7	E, T	shall focus on the easy understanding for non expert consumers. e.g. use packaging when packaging is meant and not board when the packaging consists of non forest based elements (like plastic) as well like paper packaging for frozen foods, drink cartons etc.	Please evaluate the consumer understanding of the required product type uses. Reevaluate product type list for e.g constellations when product and packaging is FSC labeled.
3.8	T	Depending on the outcome of the discussion paper, if a single label option is chosen, the Mobius loop should be required if the claim made is recycled.	The mobius loop for recycled products shall be used for labels where the product supplied would classify as recycled in the suppliers formal claim documentation.

3.8	T	“Moebius loop” might not be known by everyone	Please insert Moebius loop in Terms and definitions
3.9	T	Are we as TM Approvers expected to substantiate the reclaimed material content?	Not all our approvers have technical knowledge of COC requirements so clarify to state how this is substantiated (eg at Audit).
3.9		Language is a bit rough here. I think I understand what you’re saying. See suggestion.	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 either through internal procedures, or via information provided through the supplier’s chain of custody process. (e.g. supplier claim on invoice)
3.9	T	The FSC has not updated the certified paper lists to include the pre and post consumer percentages.	Please have it updated to reflect total percentages, or clarify how printers should determine the appropriate %.
Part IV: Graphic rules	G	Integration of possibility for general approvals for repeating label use in the same manner in same medium/ packaging/ promotional material with the time scale of one year. This puts a lot of unnecessary burden and creates a high level of frustration.	There is the possibility of year-by-year approvals for the same label layout in similar versions of packaging/ medium i.e. different packaging varieties, construction manuals for different products of one range, same magazine layout distributed on monthly scale...)
4. Labelling requirements		Evaluation of meaningfulness and applicability for the graphic rules, especially on limitations and indications on color.	
4. Labelling requirements		Evaluation of meaningfulness and applicability for the graphic rules, especially on limitations and indications on color.	
4.1 (old)	T	FSC trademark use is low. Increased use helps build the FSC brand and awareness. We need to encourage FSC trademark use by making it easy to use. The removal of restrictions of trademark use on Stationary and Letterhead is great. This is a positive change. This change is relevant in relation to Motion 36. We are performing a study to look at confusion in the marketplace. Originally use on letterhead and stationary was restricted because we worried about marketplace confusion. Removing 4.1 restrictions in advance of the study negates the value we’re hoping to gain from the study.	No change. I support removal of 4.1 and the restrictions on logo use on letterhead and stationary.
4.1 (old)	T	FSC trademark use is low. Increased use helps build the FSC brand and awareness. We need to encourage FSC trademark use by making it easy to use. The removal of restrictions of trademark use on Stationary and Letterhead is great. This is a positive change. This change is relevant in relation to Motion 36. We are performing a study to look at confusion in the marketplace. Originally use on letterhead and stationary was restricted because we worried about marketplace confusion. Removing 4.1 restrictions in advance of the study negates the value we’re hoping to gain from the study.	No change. I support removal of 4.1 and the restrictions on logo use on letterhead and stationary.
4.1, 4.2, 4.4 (old)	G	It is a step in the right direction to remove these requirements as they limit options of label use and will allow for labels to be placed in areas where promotion of FSC is highly important	
4.1 (old), 7.3 (old)	T	All stakeholders approved this change and no other suggestions have been raised.	
4.1 (old), 7.3 (old)	T	All stakeholders approved this change and no other suggestions have been raised.	
4.1 (old), 7.3 (old)	T	All stakeholders approved this change and no other suggestions have been raised.	
4.2	E	Covered by FSC Certification. This could be deemed to include Controlled Wood.	Clarify by adding other than FSC Controlled Wood items.
4.2		Unclear and confuse.	Clarify.

4.2	E	Domtar seeks further clarification/additional details regarding the language regarding FSC label use on packaging materials. Specifically, regarding the cartons in which Domtar FSC paper products are typically sold in. Can these no longer feature the FSC label? The material the carton is made out of is not certified material, but Domtar would still like to utilize the trademark on packaging components to promote the certified product in which the cartons contain.	Domtar recommends FSC allowing the use of labels on non-permanent parts of the product, such as packaging cartons.
4.2		Label shall be used only when all permanent forest based parts of the product are covered by FSC certification. There are often questions about which part need to be certified, and some examples are still missing ie : wooden frame and back of the frame... I think that all tricky cases should be listed and easily accessible to stakeholders	For more details, see directive 40-004 (and indicate the internet link for access.)
4.2	T	"Permanent forest-based parts" is difficult to understand. There is an explanation in an advice note.	Please add the explanation to the standard, possibly in Terms and definitions.
4.2	T, E	Is this aligned with FSC-STD-40-004 in terms of eligibility for labelling of products containing NTFPs (as well as timber/paper elements)	Ensure alignment with FSC-STD-40-004
4.2	T	This clause needs to be further clarified. The intent is unclear and could lead to inconsistent interpretation across certifiers.	Change the clause to read: The label shall be used only where all permanent forest-based parts of the product are covered by FSC certification. Packaging materials are not considered permanent parts of the product and are not required to be certified in order to carry a label referring to the products therein. The packaging materials may be treated as products in their own right.
4.3	G	It is up to the client where they put the label.	Deletion. Why would a CH want to hide the label and this is subjective.
4.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Placements of Labels should be recommendations and not prescriptive.	Modification: It is recommended to place the FSC label clearly visible on the product, its packaging, or both.
4.3	T	Should be a Shall. Does not refer to clause 4.8	The FSC label shall be clearly visible on the product, its packaging, or both. Unless using extra logos as per 4.8
4.3	T	It is not always easy to understand what is "clearly visible". The use of the logo is not mandatory on FSC products so I think that also a logo in a position a bit hide is anyway positive for FSC (when correct in terms of size, colours and type).	Deletion
4.3		The term should is confuse for specific permission, as pharmaceutical industry. Link with NI about this: Question Is it possible to display the FSC label inside packaging?Published Thursday, 16. February 2012	INCLUDE NOTE
4.3	T	We support that the label visibility on-products as a recommendation, because not in all cases is possible to place the label visible, for example, in medicines, where legislation restricts the use of additional information in the external area of the packaging.	4.3. It is recommended to place the The FSC label should be clearly visible on the product, its packaging, or both.
4.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Placements of Labels should be recommendations and not prescriptive.	Modification: It is recommended to place the FSC label clearly visible on the product, its packaging, or both.
4.3	G	A more flexible use of the label is good	
4.3	T	Not understood what "visible" means. Should be visible by consumer without destroying the product. E.g. placement on the bottom is visible when consumers searches for product information. The placement on the backside of an envelope or paper yoghurt label is only visible when the product is destroyed after use.	Redraft the paragraph.

4.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Placements of Labels should be recommendations and not prescriptive.	Modification: It is recommended to place the FSC label clearly visible on the product, its packaging, or both.
4.3	T	We support that the label visibility on-products is a recommendation, because not in all cases is possible to place the label visible, for example, in medicines, where legislation restricts the use of additional information in the external area of the packaging.	4.3. It is recommended to place the The FSC label should be clearly visible on the product, its packaging, or both.
4.3	T	4.3 have been changed to a recommendation. This makes it more confusing to users, and not enforceable to certifiers.	Remove or rewrite.
4.3	T	"Visible on the product, its packaging, or both". The intention is probably to say that it can be only on the product, only on the packaging or both places. The current text can be misunderstood.	Please rewrite.
4.3		Permission to display the label also on places that are less visible, if justified. Examples are envelopes, paper banderoles/bobbins of yoghurt containers, labeling of main product that comes in a packaging.	
4.3		This clause has been a source of argument over the years. Is the bottom of a Kleenex box "clearly visible" or does the label have to be on top of the box? The change from 'shall' to 'should' eliminates that issue, and therefore is an excellent change.	
4.3	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification. Placements of Labels should be recommendations and not prescriptive.	Modification: It is recommended that the FSC label be clearly visible on the product, its packaging, or both.
4.3		Permission to display the label also on places that are less visible, if justified. Examples are envelopes, paper banderoles/bobbins of yoghurt containers, labeling of main product that comes in a packaging.	
4.4	T	Download could be printed on uncertified paper	Where a publication is to be distributed both in print and online, the FSC on-product label shall be removed from the online version.
4.4	T	RA recommends that the on-product label is removed from documents which are printed and posted on-line. There is risk of documents being printed elsewhere, or at home, with the CH's license code and an untrue FSC claim.	"...the FSC on-product label shall be removed from the online version."
4.4	T	Thank you for adding clarification of electronic documents. However further clarification would still be beneficial. For example, the promotional logo size requirement is 10mm tall, but you cannot measure a webpage. Since every screen will be a different size the 10mm requirement does not work for electronic uses.	Add wording to the standard for promotional website logo use such as "Promotional panels used on websites must be large enough so that the clients FSC license code is legible." Or include a pixel size requirement.
4.4	G	Removing label from online versions	Give guidance on how this can be monitored? How can it be removed if the online version is simply a pdf of a printed leaflet?
4.4	T	This may be a difficult requirement to achieve and the result may be that, at the end, no labels are used also on the paper copy.	Deletion
4.4	G	We think that this proposal is difficult to apply in many cases and that it can discourage the use of trademark.	Deletion
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. The only result would be that your logo wouldn't be put on the printed version .	The only result would be that your logo wouldn't be put on the printed version ... because printer can't made the same document in two way without a lot of complications in their process (the content of the

			pdf-file is produced once for printed version and off line version)
4.4	T	This requirement is a problem for the printing industry because it's very difficult for the license holders to enforce this. The problem is that the license holder often receives the print files from the customers with the FSC label integrated in the layout. The license holder is of course responsible for checking the FSC label prior to the printing but the license holder is normally not involved in the later online distribution of the publication. When the customers like e.g. the big retailers are making a layout of the publication the label is very often integrated in the layout. If the customers are required to produce two different version of the publication, there is a major risk that they will choose only to produce one version without the FSC label. The risk of misleading product labelling should be taken into account when assessing this issue. In Grakom we consider the risk to be low. First of all online publications are only printed in a limited degree and furthermore is it easy for the end user to see if the printed product is printed on a standard printer and that the ecolabels on the product are not valid for that particular version but only for the original product.	
4.4	T	This item cannot be controlled in all instances and control over documents that may be changed to electronic is lost after publication. The standard needs to remain as flexible to allow for label use to occur	Keep requirement within standard and wording as "should".
4.4	E	This clause is not clear. What does "publication" stands for?	Add examples
4.4	G	Here it states that "where a publication is to be distributed both in print and online, the FSC on-product label should be removed from the online version". But who has the responsibility here to make sure it is removed? For example, if we order leaflets from a certified printer, and we order both digital and physical copies, who has the responsibility to ensure that no digital copies contain on-product labels? Will we [the company doing the ordering] get a non-conformity if there is a 'forgotten' on-product label, or the printer?	Clarify the responsibility here.
4.4	T,G	<p>- Many CHs observed that this Clause is simply technically inapplicable, and that it would highly discourage the trademark use by many CHs. In fact, the printing drafts are legal property (by law) of the customers, and not of the typographies finally printing that material. Noteworthy, the customer(s) may be either FSC certified or non-certified. This means that, after that the CH have printed the hard copy of the material (catalogue, or whatever else), it cannot be any more responsible, nor control, what the customer(s) will eventually do with the labelled printing drafts. This, cannot be controlled neither by CBs. Even worse, CHs would be charged by any eventual misuse made by the customer(s), as the license code in the printing drafts refer to the printing CHs, and not to the customer (as this is the case, very frequently).</p> <p>- All stakeholders, either CBs, consultants or CHs, strongly rejected and objected to this new proposed requirement, and they observed that it is not plausible that the CHs, as well as NCHs, make tremendous efforts to modify/adapt hard and digital copies. Sometimes, this would be simply impossible, e.g. for service providers (gas, electricity, telephone. providers, and many others) that may give hard, digital, or both these bill accounts to their customers. For sure, this would lead to a dramatic and widespread decrease in the FSC trademarks use, and therefore a subsequent decrease in trademark visibility, as well as in the consumers' familiarity with FSC and its trademarks.</p> <p>- Some Questions &amp;Answers released after a recent webinar (January 13th, 2016) on the FSC®Trademark Use Requirements Revision support these considerations. In fact, they contain this statement: "For example, product families consisting of products in various sizes are currently required to use both the full and mini label depending on the size of the product. This may create additional costs and may prevent consistency in design across a product family.". The mechanisms (more costs, artworks to be adapted, prevention</p>	The final standard should be better describe which are the elements of the label, as for Clauses 3.2 and 3.4 of the current standard version. All stakeholders, either CBs, consultants or CHs, strongly rejected and objected to this new proposed requirement, stating that it is technically inapplicable, and that it would highly discourage the trademark use by many CHs. The new requirement should be rejected.

		to trademark use, etc.) are the same, though applied to different contexts.	
4.4	T,G	<p>- Many CHs observed that this Clause is simply technically inapplicable, and that it would highly discourage the trademark use by many CHs. In fact, the printing drafts are legal property (by law) of the customers, and not of the typographies finally printing that material. Noteworthy, the customer(s) may be either FSC certified or non-certified. This means that, after that the CH have printed the hard copy of the material (catalogue, or whatever else), it cannot be any more responsible, nor control, what the customer(s) will eventually do with the labelled printing drafts. This, cannot be controlled neither by CBs. Even worse, CHs would be charged by any eventual misuse made by the customer(s), as the license code in the printing drafts refer to the printing CHs, and not to the customer (as this is the case, very frequently).</p> <p>- All stakeholders, either CBs, consultants or CHs, strongly rejected and objected to this new proposed requirement, and they observed that it is not plausible that the CHs, as well as NCHs, make tremendous efforts to modify/adapt hard and digital copies. Sometimes, this would be simply impossible, e.g. for service providers (gas, electricity, telephone. providers, and many others) that may give hard, digital, or both these bill accounts to their customers. For sure, this would lead to a dramatic and widespread decrease in the FSC trademarks use, and therefore a subsequent decrease in trademark visibility, as well as in the consumers' familiarity with FSC and its trademarks.</p> <p>- Some Questions &amp;Answers released after a recent webinar (January 13th, 2016) on the FSC®Trademark Use Requirements Revision support these considerations. In fact, they contain this statement: "For example, product families consisting of products in various sizes are currently required to use both the full and mini label depending on the size of the product. This may create additional costs and may prevent consistency in design across a product family.". The mechanisms (more costs, artworks to be adapted, prevention to trademark use, etc.) are the same, though applied to different contexts.</p>	All stakeholders, either CBs, consultants or CHs, strongly rejected and objected to this new proposed requirement, stating that it is technically inapplicable, and that it would highly discourage the trademark use by many CHs. The new requirement should be rejected.
4.4	T	FSC Denmark and companies at the information meeting believes this is problematic as the certificate holder is not involved in this kind of process – it is happening at the clients / in the hands of the client. The certificate holder don't know if the clients are making an online version of a printed material with FSC label. This raises questions like: How can a certificate holder control this? What is required to meet this proposed clause? Does this mean that the certificate holder per default has to inform every client who buys FSC labelled print materials about this clause?	Please make this clause more specific in terms of the questions asked in this comment or leave out this clause of the second and/or final draft. And please to consider and analyze the administrative burden for the certificate holder that could be created by introducing this new clause before next draft / final revised standard.
4.4	E	The use of the word "should" seems strange. Is this the intention? That it is up to the certificate holder to follow this clause or not?	Please reconsider this clause and the intention with it. As it is written now it is very vague.

4.4	T,G	<p>- Many CHs observed that this Clause is simply technically inapplicable, and that it would highly discourage the trademark use by many CHs. In fact, the printing drafts are legal property (by law) of the customers, and not of the typographies finally printing that material. Noteworthy, the customer(s) may be either FSC certified or non-certified. This means that, after that the CH have printed the hard copy of the material (catalogue, or whatever else), it cannot be any more responsible, nor control, what the customer(s) will eventually do with the labelled printing drafts. This, cannot be controlled neither by CBs. Even worse, CHs would be charged by any eventual misuse made by the customer(s), as the license code in the printing drafts refer to the printing CHs, and not to the customer (as this is the case, very frequently).</p> <p>- All stakeholders, either CBs, consultants or CHs, strongly rejected and objected to this new proposed requirement, and they observed that it is not plausible that the CHs, as well as NCHs, make tremendous efforts to modify/adapt hard and digital copies. Sometimes, this would be simply impossible, e.g. for service providers (gas, electricity, telephone. providers, and many others) that may give hard, digital, or both these bill accounts to their customers. For sure, this would lead to a dramatic and widespread decrease in the FSC trademarks use, and therefore a subsequent decrease in trademark visibility, as well as in the consumers' familiarity with FSC and its trademarks.</p> <p>- Some Questions &amp;Answers released after a recent webinar (January 13th, 2016) on the FSC®Trademark Use Requirements Revision support these considerations. In fact, they contain this statement: "For example, product families consisting of products in various sizes are currently required to use both the full and mini label depending on the size of the product. This may create additional costs and may prevent consistency in design across a product family.". The mechanisms (more costs, artworks to be adapted, prevention to trademark use, etc.) are the same, though applied to different contexts.</p>	All stakeholders, either CBs, consultants or CHs, strongly rejected and objected to this new proposed requirement, stating that it is technically inapplicable, and that it would highly discourage the trademark use by many CHs. The new requirement should be rejected.
4.4	G	This should not be added to the standard. It places an undue burden on certificate holders to monitor how their customers are using electronic versions of printed pieces.	Remove this clause entirely.
4.4	T	I do not understand the need of this restriction.	Deletion
4.4 (old)	T	Stakeholders observed that the "degrees of freedom" allowed to CHs should be better defined. Particularly for the promotional scope, possible trademark uses are almost innumerable, and misuses are particularly likely to occur, specifically covering issues listed in Clause 2.1, letters a)-e).	CBs agreed that it would be better to exclude the promotional use from the self-approval scope. No CHs nor consultants objected to such a comment.
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4.6	E	FSC-certified, FSC-labelled	Remove hyphen and be consistent throughout all parts of the Standard.
4.6		Doubt : printed material with FSC On-product label cannot have PEFC and FSC promotional label?	Clarify
4.6	G	We welcome this clarification	
4.6	G	In a country like Sweden where most companies are double certified this standard leads to several situations where none of the labels are used.	Deletion

4.6	E	Reference to double certification, and only in the on product section.	If FSC prohibits claims of double and triple certification, add this requirement in the promotional section also, and include specific tri-certified claim as prohibited.
4.7	E	This is referring to when there is ONLY a FSC Logo and Licence code (no other parts of an on product label)	If there is a full/mini label applied directly to the product, no swing tag or sticker should be needed?
4.7		In this case the on-product label still have the license code.	the extra logo doesn't need to have license code.
4.7	T, E	Confused by what is the difference of FSC logo with licence code and on product label ?	Redraft and specify further please
4.7	G, E	This requirement is very difficult for us to understand.	Please clarify and rewrite.
4.7	T	On-product label needs to be define in Terms and definitions	Please insert in Terms and definitions
4.7	E	Improve wording for clarification	The FSC logo with only the licence code may be applied directly to a product if an on-product label is used.....
4.8	G	Ambiguous clause	Forest for All Forever mark must be used in a more prominent place.
4.8	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It is not possible to audit this. The "shall" causes unproportioned high risk to loose certification for users.	Delete: In this case, the on-product label shall be visible to the consumer without purchasing the product.
4.8	E	RA agrees with the recommendation, but proposes simpler text.	"When the on-product label placement is not consumer facing (such as the inside of a book), an extra logo or Forests for All Forever mark may be used in a more prominent place."
4.8	E	This contradicts 4.3. Product may be wrapped in cellophane	Leave this clause but remove 4.3 (and renumber!) If the artwork has been approved, it doesn't matter that the customer doesn't see the full label until they get home and unwrap the product.
4.8	T	This sentence is not clear. Does the on-product label need to be visible in any cases? Thinking about a book, where the on-product label can be places inside the book, I think it is sufficient even if it's not placed in the visible side.	Clarify the sentence
4.8		Clarify: In this case, the on-product label shall be visible to the consumer without purchasing the product.	Delete it, too complicate and the product will already have FSC label.
4.8	T	Almost all times, space constraints are the reason why FSC label is not placed in the side facing the consumer, and because of this, an extra logo would not be the solution. The most suitable is that the label placement is a recommendation, once sub-clauses to address case-by-case constraints compromise the standard's generality. Remembering, there are situations where legislation prohibits additional information in the external package of products, as explained for medicines, for example.	
4.8	T, E	sense of simplification. It is not possible to audit this. The "shall" causes unproportioned high risk to loose certification for users.	Delete: In this case, the on-product label shall be visible to the consumer without purchasing the product.
4.8	T	Line 4.8 is not consistent with the consumer facing terminology	Change final sentence to include that the trademark has to be On the product. And not on a side retail display or some other item as there will be an FSC tree checkmark on the front and an on

			product label meeting requirements somewhere else visible on the outside of the product.
4.8	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It is not possible to audit this. The "shall" causes unproportioned high risk to loose certification for users.	Delete: In this case, the on-product label shall be visible to the consumer without purchasing the product.
4.8	T	Almost all times, space constraints are the reason why FSC label is not placed in the side facing the consumer, and because of this, an extra logo would not be the solution. The most suitable is that the label placement is a recommendation, once sub-clauses to address case-by-case constraints compromises the standard's generality. Remembering, there are situations where legislation prohibits additional information in the external package of products, as explained for medicines, for example.	
4.8	T	Where the normal label placement for a product is not on the side facing the consumer (ie: side panel, inside a book) So why not considering the most prominent space inside the packaging? (I mainly think of all the cosmetics brands that lack space or don't want to openly associate their image with a logo, such as Chanel. Allowing this would give us more visibility and a chance to be seen on luxury brand packaging) "an extra logo or Forest for All Forever mark may be used in a more prominent place. <i>In this case, the on-product label shall be visible to the consumer without purchasing the product.</i> " This could make this use of extra logo almost impossible for books/agendas if they're wrapped up!!! That should preferably be asked but not compulsory.	Where the normal label placement for a product is not on the side facing the consumer (ie: side panel, inside a book or on inside flaps of the top of the packaging only in case of space restriction) ...In this case, the on-product label should preferably be visible to the consumer without purchasing it.
4.8	G	Intention of following sentence is not clear: In this case, the on-product label shall be visible to the consumer without purchasing the product. I do not see any reason why the on product label has to be visible to those who do not purchase the product. Clause 4.3 of the draft standard has become from "shall" to "should". To align with this clause, I recommend removing the last sentence from this clause.	Remove the last sentence from this clause Or Write the last sentence in a way so that it is clear to every reader what the intention of the sentence is.
4.8	G, E	This is too complicated and will be very difficult to audit.	Please remove.
4.8	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Delete: In this case, the on-product label shall be visible to the consumer without purchasing the product.
4.9	T	Organisations must not leave permanent marks on semi-finished products.	the FSC label shall only be applied to packaging or.
4.9	T	should be sufficient to say this is only allowed when this claim is not used in the further selling process with the risk of being counted as credit by label	redraft
4.9	E	This is again difficult to understand with the use of should in the sentence. Wouldn't it be better to write that semi-finished products shall not be labelled in a way which leads to that the final products is labelled wrongly.	Please rewrite.
4.10	G	What if the supplier is a trader and is getting their supplier to label the product. Is the supplier expected to disclose his supplier?	Include something about agreements between supplier chain actors
4.10	T, E	Labelling agreements should be evaluated during FSC audits.	
4.10	T, E	FSC should supply a multi-language template for labelling	

4.10	T	Currently, many CHs in the timber industry orders FSC-certified printers to print company brochures or business cards with their own FSC trademark license codes. If Clause 4.10 (a) is introduced as currently proposed, such CHs in timber industry are no longer able to order printed materials with their own FSC trademark license codes. That would greatly discourage those CHs to use FSC certified papers.	Products to be labelled shall be included in the certificate scope of both organizations if the buyer sells such products as FSC certified products.
4.10	E	FSC-certified, FSC-labelled	Remove hyphen and be consistent throughout all parts of the Standard.
4.10	T	We cannot see a real advantage in terms of trademark use security in the addition of the same trademark approval in two audit scopes. This would imply in administrative burden and would overlap audit efforts. In addition, it is not clear which CB is going to be responsible for trademark approval e how an organization is going to have access to the trademark approval made by other organization. Double storage of data is infeasible and we could not see a gain on this.	4.10. If two FSC-certified organizations enter into an agreement whereby the supplier labels products with the buyer's FSC trademark license code, the following conditions shall be met.(a) Products to be labelled shall be included in the certificate scope of both the organizations responsible for the license code. (b) Both parties shall inform their certification bodies in writing about the agreement. This information shall include the definition of which certification body shall be responsible for approval of product labels. (c) The selected certification body is responsible for ensuring that the buyer's code is only used on products which are supplied to that buyer. (d) Both organizations responsible for the license code shall keep data relating to the use of the buyer's labels easily available for review by the certification body.
4.10	T, E	Labelling agreements should be evaluated during FSC audits.	
4.10	T, E	FSC should supply a multi-language template for labelling agreements, for down load from the label generator platform.	
4.10	G	We welcome the simplifications by the removed sections and particular the removal of the former section 4.1 and 4.4	
4.10	T, E	the 4.10. should also include labelling arrangements with the uncertified companies.	Addition (from the existing standard): A retailer or brand owner who does not hold an FSC certificate may request the supplying organization to label products with the FSC label together with the customer's brand name and design. All standard guidance about labeling, preventing confusion of brands and information, and trademark approval shall be followed.
4.10	T, E	Labelling agreements need to be evaluated during FSC audits (and they already are..)	
4.10	T, E	Metsä Group emphasizes that the 4.10. should also include labelling arrangements with the uncertified companies.	Addition (from the existing standard): A retailer or brand owner who does not hold an FSC certificate may request the supplying organization to label products with the FSC label together with the customer's brand name and design. All standard guidance about labeling, preventing confusion of brands and information, and trademark approval shall be followed.
4.10	G	The proposed change will make it very difficult for printers who outsource work, often a subcontractor will be selected at relatively short notice.	Deletion

4.10	T, E	SE WSF emphasizes that the 4.10. should also include labelling arrangements with the uncertified companies.	Addition (from the existing standard): A retailer or brand owner who does not hold an FSC certificate may request the supplying organization to label products with the FSC label together with the customer's brand name and design. All standard guidance about labeling, preventing confusion of brands and information, and trademark approval shall be followed.
4.10	T, E	Labelling agreements should be evaluated during FSC audits.	
4.10	T, E	FSC should supply a multi-language template for labelling agreements, for down load from the label generator platform.	
4.10	T	Draft standard is missing Labelling arrangements with uncertified organizations. This is essential part of the use of the supplier's FSC label on the products which are final end products produced by the supplier and distributed/sold by a uncertified company (i.e. copy paper).	To add from existing standard: 4.6. A retailer or brand owner who does not hold an FSC certificate may request the supplying organization to label products with the FSC label together with the customer's brand name and design. All standard guidance about labeling, preventing confusion of brands and information, and trademark approval shall be followed.
4.10	T, E	FFIF emphasizes that the 4.10. should also include labelling arrangements with the uncertified companies.	Addition (from the existing standard): A retailer or brand owner who does not hold an FSC certificate may request the supplying organization to label products with the FSC label together with the customer's brand name and design. All standard guidance about labeling, preventing confusion of brands and information, and trademark approval shall be followed.
4.10	T	We cannot see a real advantage in terms of trademark use security in the addition of the same trademark approval in two audit scopes. This would imply in administrative burden and would overlap audit efforts. In addition, it is not clear which CB is going to be responsible for trademark approval e how an organization is going to have access to the trademark approval made by other organization. Double storage of data is infeasible and we could not see a gain on this.	4.10. If two FSC-certified organizations enter into an agreement whereby the supplier labels products with the buyer's FSC trademark license code, the following conditions shall be met. (a) Products to be labelled shall be included in the certificate scope of both the organizations <u>responsible for the license code</u> . (b) Both parties shall inform their certification bodies in writing about the agreement. This information shall include the definition of which certification body shall be responsible for approval of product labels. (c) The selected certification body is responsible for ensuring that the buyer's code is only used on products which are supplied to that buyer. (d) Both organizations <u>responsible for the license code</u> shall keep data relating to the use of the buyer's labels easily available for review by the certification body.

4.10		In this clause „products“ should be replaced by „product types“. It does not make sense to list each article in a certificate. Also the main reason to make use of rule is to make sure that the client does not identify the supplier through the license number. In this respect buyers would not want that the article description or names of private labels would need to be mentioned on the certificate in future and to disclose this information to the public.	replaced „products“ by „product types“
4.10		Nice changes.	
4.10	T, E	FSC should supply a multi-language template for labelling agreements, for down load from the label generator platform.	
4.10 c)	E	RA agrees with this requirement, but proposes a change of text.	“The certification body of the supplier is responsible for ensuring that the buyer’s code is only used on products which are supplied to that buyer.”
4.10 c)	T	If the selected CB is the client, not the supplier, and unless that body is expected to audit the supplier, this is not possible	The suppliers certification body is responsible for ensuring that the buyer’s code is only used on products which are supplied to that buyer.
4.10 c)		Elimination of the contradiction or clarification, that the CB of the buyer cannot control the supplier.	
4.10 c)		Elimination of the contradiction or clarification, that the CB of the buyer cannot control the supplier.	
4.10 d)	E	Clarify what is meant by Data? How can the CB who is not responsible for approval keep data?	Change to state both CBs will keep a copy of the labelling agreement.
4.10 d)	T, E	no support that the requirement to keep data relating to the use of the buyer's labels is widened to cover both organizations.	Modification: The buyer shall keep data relating to the use of the buyer's labels easily available for review
4.10 d)	T, E	Metsä Group does not support that the requirement to keep data relating to the use of the buyer's labels is widened to cover both organizations.	Modification: The buyer shall keep data relating to the use of the buyer's labels easily available for review
4.10 d)	T, E	SE WSF does not support that the requirement to keep data relating to the use of the buyer's labels is widened to cover both organizations.	Modification: The buyer shall keep data relating to the use of the buyer's labels easily available for review
4.10 d)	T	Unnecessary bureaucratic added (for two organizations as well as for CB) by requiring <u>both</u> organizations to keep data relating to the use of the buyer's labels availability for review by the certification body.	To keep existing requirement that <u>supplier</u> shall keep data relating to the use of the buyer's labels easily available for review by the certification body.
4.10 d)	T, E	FFIF does not support that the requirement to keep data relating to the use of the buyer's labels is widened to cover both organizations.	Modification: <b>The buyer</b> shall keep data relating to the use of the buyer's labels easily available for review
5. Promotional elements	T	This is written in a way that means that the FSC label has to be used and therefore use of FSC initials/name cannot be used without the label. Is this the intention? For example, when used on a website or in a publication.	
5. Promotional elements	T	Is it possible to use the FSC trademark for a one-time promotion, not linked to specific FSC certified products? E.g. a promotional stand in a fair.	If it is possible, I would try to clarify it.
5.1	G	This now says that a logo shall always be used in any promotional materials. Companies may wish to refer to having FSC certification in annual reports, news articles etc where use of logos is not possible, and currently in such cases we ensure that the licence code is used.	In promotional materials where only the letters FSC or name Forest Stewardship Council are used, without a logo, the company shall include the licence code.
5.1	G	RA requests that FSC provide some pre-approved forest/product related messaging	
5.1		The certificate holder can use only FSC mark and the license code, without label.	“ When promoting FSC-certified products or status as FSC certificate holder using the FSC

			promotional label, one of the following shall be used..." - The promotional label has been replaced by those present in the requirement?
5.1	T	During the discussion with stakeholders it has been raised the need of clarifying whether, in this case, the product type is more specific than the generic ones, i.e. "wood", "paper", etc. (refer to proposed Clause 3.7). in other words, does this "product type" refer to those listed in FSC-STD-40-004a? If this is the case, it should be better specified. Generally speaking, the wording in different standards should be aligned.	Clarification and wording alignment
5.1	G	It should be possible to relate the messaging to company	Forest/product/company-related messaging
5.1	T	During the discussion with stakeholders it has been raised the need of clarifying whether, in this case, the product type is more specific than the generic ones, i.e. "wood", "paper", etc. (refer to proposed Clause 3.7). in other words, does this "product type" refer to those listed in FSC-STD-40-004a? If this is the case, it should be better specified. Generally speaking, the wording in different standards should be aligned.	Clarification and wording alignment
5.1	G	"Forests For All Forever" is a good tag line.	
5.1		We would like to see the option of using the logos without text. We would also like to see the option of using the logo without the license code and instead the possibility to clearly show which company is responsible for the promotional material.	Please change the requirement.
5.1	G	It is not clear what is meant by "Forest/product related messaging"	Clarify and/or provide pre-approved text
5.1	G	This clause implies that the FFAF marks can be used in relation to promotion of all FSC certified products and FSC certified companies. The terms and conditions on the marketing toolkit currently restrict this to FSC labelled products.	Amend terms and conditions on marketing toolkit (or, if they are correct, amend this clause)
5.1		Permission of promotional uses that relate to the company or clarification that additional text can be used optional.	
5.1	T	During the discussion with stakeholders it has been raised the need of clarifying whether, in this case, the product type is more specific than the generic ones, i.e. "wood", "paper", etc. (refer to proposed Clause 3.7). in other words, does this "product type" refer to those listed in FSC-STD-40-004a? If this is the case, it should be better specified. Generally speaking, the wording in different standards should be aligned.	Clarification and wording alignment
5.1		This section is confusing because it doesn't look like the actual labels.	I suggest using actual labels in the standard, or adding a clarifying statement that the pictured logos need to be in the label format pulled from the trademark generator.
5.1	G	Promotional panel is not shown, yet the stand alone FSC logo is. If the promotional panel is not presented, CHs will always use the stand alone logo with license code.	Add visual of Promotional Panel under 5.1 (a)
5.1		Permission of promotional uses that relate to the company or clarification that additional text can be used optional.	
5.1 c)	T	Question: could we use the logo (5.1. c) in this way ?	Or do we need to add text : Reference to product promoted and/or forest- related messaging ? I don't understand the reference to "product promoted" if we use this logo for Off product promotion ?

5.1, 5.3	G	Allowing use in multiple manners allows for flexibility of certificate holders to choose their favoured look. This addition to the standard will allow a greater use of promotional trademarks in the future.	
5.2	E	Clause is unclear	Clarify what is meant by 'text' in this clause (examples?)
5.2		Why not being able to omit text for all options.	Please change.
5.3	G	RA requests that an image of the FSC promotional panel be included with this requirement.	
5.3	G	This is information not a clause to be complied with.	Either have the organisation use the logo generator or move to a note
5.3	E	is written as a comment and should be rephrased as a requirement.	
5.3	T	This is not standard text, this is side information	Put in information box or take away
5.3		Well, this basically answers my point above, and I suggest it be a clarifying comment in 5.1. Here, as a separate clause, it implies that CHs don't have to use the pre-designated labels from the label generator, as long as they have the pieces outlined in 5.1. Was that the intention?	
5.4		Item 5.4 does not exist in standard	
6.1	G	RA recommends that the requirement for additional text be removed. Many CHs do not have the technical capability to add additional graphics outside of the label design.	Deletion
6.1	E	The word 'unless' gets lost in this sentence and it is not easy to decipher the intent of the paragraph.	Provide better wording; eg If the FFAF mark is used on the same side of page as a full on product label, then no further reference to the product being promoted is required. If the FFAF Mark is not used alongside the full label, then a description such as 'FSC certified board' or similar will be added alongside the FFAF mark.
6.1	T	Clause refers to on product	Move to on-product section
6.1	T, E	This is an unnecessary limitation to TM use and not in the	Deletion
6.1		To complex and restrictive	Deletion
6.1	T	Options presented in the discussion paper bring the need of adding which product type is certified on on-product labels. In cases where the product as a whole and its package are both certified, the product type can be removed. If this possibility exists, it is necessary to add the product type again when using "Forest For All Forever"?	Clarify this question and align according to the options purposed in the discussion paper.
6.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
6.1	T, E	This is an unnecessary TM limitation on usage and does not meet the request for simplification at the 2014 GA	Deletion
6.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
6.1	T	Options presented in the discussion paper bring the need of adding which product type is certified on on-product labels. In cases where the product as a whole and its package are both certified, the product type can be removed. If this possibility exists, it is necessary to add the product type again when using "Forest For All Forever"?	Clarify this question and align according to the options purposed in the discussion paper.
6.1	G	The example does not address the situation where the on-product label includes the product type and is on the same side as the FFAF mark. Also, does this only relate to 5.1b) and not 5.1c) artwork?	Remove example or use other example
6.1	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Delete this clause.

6.2	T, E	sense of simplification.	Deletion
6.2	E	Reference to 4.1 does not reference promotional elements of the trademarks.	Revise reference to 4.1 to 5.1
6.2	E	Does this mean 4.1? Does the same clause apply if FSC initials are used in a catalogue but no Promotional Panel? Does this apply to Printer's websites where any products can be provided as FSC Certified? Are the brochures referred to only Sales Brochures that include actual products that can be purchased?	Correct the clause referred to (5.1?) Clarify what the intent of this clause is.
6.2	G	This is almost identical to 6.1 in the current version, which causes widespread confusion as to whether it applies to all websites. Few are actually 'on line sales websites' but the difference is whether they show actual examples of products available (such as e.g. furniture in different species, where it is important to prevent confusion about what is available as FSC) or whether they are general promotional websites such as those of printers which have no 'products' as such.	Where the set of promotional elements described in 4.1 is used in catalogues, brochures, or websites that show or list both certified and uncertified products, the company shall either include a statement such as 'ask for our FSC certified products' or clearly indicate the FSC products with the FSC trademark or letters FSC.
6.2	E	What is the preferred trademark?	FSC-certified products shall be indicated by using the trademark or logo.
6.2	T	What if they use more than one trademark but neither is with products?	Clarification needed
6.2		Do not contribute to clarify to consumer that company can offers FSC and NON certified products.	6.2. Where the set of promotional elements described in 4.1 is used only once in catalogues, brochures, and online sales websites that also include uncertified products, the company should clearly list which products are FSC-certified.
6.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
6.2	G	Clause 6.2 references clause 4.1. Should reference clause 5.1.	Correct reference.
6.2	T, E	This is an unnecessary TM limitation on usage and does not meet the request for simplification at the 2014 GA	Deletion
6.2	T	This clause is about a product range with products, which are FSC-certified and products, which are not FSC-certified. However, what happens for the product, which can be FSC-certified on request in case of a FSC credit system (a same product can be FSC certified or not)?	Add a clause for the product which can be FSC certified on request (credit system)
6.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
6.2	T	Section 6.2 of the standard appears to be trying to address deceptive marketing i.e. the difference between certified companies and certified products (motion 36 passed at the last GA). But the section is quite confusing and does not adequately address the problem.	We support Jason Grants proposed wording : Where any of the trademarks in 5.1 is used in marketing materials, including but not limited to catalogues, brochures and websites, where uncertified products are offered, then FSC-certified products shall be clearly identified through the use of FSC trademarks and/or text (e.g. "FSC-certified," "product is FSC-certified," " available as FSC-certified") In addition, the following text shall appear in conjunction with the promotional element and shall be easily readable [specify minimum font size?]: "Because our company sells both FSC-certified and non-certified products, FSC-certified products on offer are clearly identified."

6.2	T	This clause is important and should be retained, but it does not adequately address the problem of market confusion and deceptive marketing raised in Motion 36.	We support the following proposed language: "Where any of the trademarks in 5.1 is used in marketing materials, including but not limited to catalogues, brochures and websites, where uncertified products are offered, then FSC-certified products shall be clearly identified through the use of FSC trademarks and/or text (e.g. "FSC-certified," "product is FSC-certified," "available as FSC-certified") In addition, the following text shall appear in conjunction with the promotional element and shall be easily readable [specify minimum font size?]: "Because our company sells both FSC-certified and non-certified products, FSC-certified products on offer are clearly identified."
6.2	T	This clause cites section 4.1, but this is an inaccurate citation. It should refer to section 5.1.	Change 4.1 to 5.1
6.2	E	This phrasing is awkward and slightly confusing.	Proposed language: "Where any of the trademarks in 5.1 is used in marketing materials, including but not limited to catalogues, brochures, and websites, in which uncertified products are offered, the trademark shall be accompanied by text such as, "Our FSC-certified products are indicated by the FSC trademark." All FSC-certified products within the marketing material shall be indicated using the preferred trademark."
6.2	T	This section is confusing, awkwardly worded and weak, and it references the wrong section (it should be 5.1, not 4.1, and should be replaced with the following: Where any of the trademarks in 5.1 is used in marketing materials, including but not limited to catalogues, brochures and websites, where uncertified products are offered, then FSC-certified products shall be clearly identified through the use of FSC trademarks and/or text (e.g. "FSC-certified," "product is FSC-certified," "available as FSC-certified") In addition, the following text shall appear in conjunction with the promotional element and shall be easily readable [specify minimum font size?]: "Because our company sells both FSC-certified and non-certified products, FSC-certified products on offer are clearly identified."	
6.2	E	Typo: 6.2. Where the set of promotional elements described in 4.1 is used	6.2. Where the set of promotional elements described in 5.1 is used
6.2	G	FSC-certified products shall be indicated by using the preferred trademark. It is not clear what precisely preferred trademark means. Is it preference of FSC or preference of CH? If it is preference of CH, then wording should be any of the FSC trademarks. If it is preference of FSC, then it should be made clear which of the FSC trademarks FSC prefer.	Clarification needed.
6.2	T	The text is complicated, the important thing is to show which products that are FSC-certified. Adding of the required text "Look for FSC-certified products" can be a recommendation not a requirement. Since this only adds to the complexity of the standard. The last sentence is a positive change.	Remove the requirement "Look for FSC-certified products" in catalogues.
6.2	E	Is it necessary to state "where the products are not all on the same page"? Would we not insist on this statement if there were non-FSC products on the page? Simpler to insist on statement if there are any non-FSC products in the catalogue, website, etc.?	Delete "where the products are not all on the same page"
6.2		Clarify "preferred trademark"	

6.2	E	"FSC-certified products shall be indicated by using the preferred trademark" is vague. What is the preferred trademark, and whose preference? This is left too open.	Revert back to previous text by using the 'FSC certified' description or the stand alone FSC logo. Much clearer.
6.2	T, E	This clause is important and should be retained, but it is poorly worded and does not adequately address the problem of market confusion and deceptive marketing raised in Motion 36. Also, it references the wrong section (should be 5.1, not 4.1)	Replace current text as follows: "Where any of the trademarks in 5.1 is used in marketing materials, including but not limited to catalogues, brochures and websites, where uncertified products are offered, then FSC-certified products shall be clearly identified through the use of FSC trademarks and/or text (e.g. "FSC-certified," "product is FSC-certified," "available as FSC-certified") In addition, the following text shall appear in conjunction with the promotional element and shall be easily readable [specify minimum font size?]: "Because our company sells both FSC-certified and non-certified products, FSC-certified products on offer are clearly identified."
6.2	E	It says "promotional elements described in 4.1."	Should say: promotional elements described in 5.1."
6.3	T, E	The wording is too prescriptive and therefore limiting.	Modification: The FSC trademarks may be used on promotional items. In these cases, the FSC logo and FSC trademark licence code are sufficient.
6.3		Good, examples of logo uses.	
6.3	T, E	he wording is too prescriptive and therefore limiting.	Modification: The FSC trademarks may be used on promotional items. In these cases, the FSC logo and FSC trademark licence code are sufficient.
6.3	T, E	The wording is too prescriptive and therefore limiting.	Modification: The FSC trademarks may be used on promotional
6.3	G	This implies that the FFAF trademarks can be used on these promotional items (without the restrictions imposed, for example, in clause 6.1) – is this correct	Review 6.3
6.3	T, E	The wording is too prescriptive and therefore limiting.	Modification: The FSC trademarks may be used on promotional items. In these cases, the FSC logo and FSC trademark licence code are sufficient.
6.4	T	should exclude dummy items e.g. mock-ups of drink cartons to showcase a format and design to business customers	Exclude these demonstration items from this rule
6.4	E	CHs often questioned whether the on-product label was required, and we had to consult with FSC to confirm it doesn't	Revise wording to indicate that the on-product label in addition to the promotional use is optional.
6.4	T	Use of a promotional label on wood products should have no tie to the FSC-STD-40-004 standard. It is for promotional purposes.	Deletion
6.5		Not all certified product is labeled ( ex-pulp)	Deletion of a)
6.5	G	This should be a part of a guidance document, if it is needed at all. It is difficult to understand how activities at a trade fair will be audited, even if complaints are received. This is another example of the draft Standard being overly prescriptive.	Eliminate this requirement from the standard.
6.5	G	This is too much detail regulation. It is important that companies doesn't do wrong claims and this can be handled in a general clause. Buyers, both professionals and consumers are used to all kind of social and environmental labels and the knowledge that most sellers sell both certified and uncertified products is widespread. It's better that the companies talk about FSC at a trade fair than they avoid doing it because of detailed regulations.	Deletion

6.5 b)	G	I find this clause hard to read. Eg 'Use of text to describe the FSC Certification of the organisation does not require a disclaimer'.	Simplify the clause. Why not?
6.6	T, E	FSC Standards are mandatory for organisations that have signed a certification agreement as well as a TLA. FSC Standards are not mandatory for related bodies or parent companies etc. Legally this clause cannot be implemented. It could be integrated into the TLA but should be deleted from this standard.	Deletion
6.6	T	This clause cannot be implemented from the legal perspective, because FSC standards are not mandatory for related bodies or parent companies, and only to those that signed a certification agreement with FSC.	Deletion
6.6	T, E	FSC Standards are mandatory for organisations that have signed a certification agreement as well as a TLA. FSC Standards are not mandatory for related bodies or parent companies etc. Legally this clause cannot be implemented. It could be integrated into the TLA but should be deleted from this standard.	Deletion
6.6	T, E	FSC Standards are mandatory for organisations that have signed a certification agreement as well as a TLA. FSC Standards are not mandatory for related bodies or parent companies etc. Legally this clause cannot be implemented. It could be integrated into the TLA but should be deleted from this standard.	Deletion
6.6	T	This clause cannot be implemented from the legal perspective, because FSC standards are not mandatory for related bodies or parent companies, and only to those that signed a certification agreement with FSC.	Deletion
6.6	T, E	FSC Standards are mandatory for organisations that have signed a certification agreement as well as a TLA. FSC Standards are not mandatory for related bodies or parent companies etc. Legally this clause cannot be implemented. It could be integrated into the TLA but should be deleted from this standard.	Deletion
6.6, 6.7	G	This must be very difficult to enforce.	Deletion
7. Restrictions on promotional use	G	Giving up on clause 7.3 of the current standard, FSC is allowing the use of trademarks in letters and other documents. Only the use on invoices is restricted by clause 7.2 of this draft.	
7. Restrictions on promotional use		Giving up on clause 7.3 of the current standard, FSC is allowing the use of trademarks in letters and other documents. Only the use on invoices is restricted by clause 7.2 of this draft.	
7.1	G	Removal of the old 7.1 is a great idea!	
7.1	G	It is impossible for companies certified FSC & PEFC to use the promotional label in a way that not implies equivalence. In this case the companies probably will decide to keep only the PEFC label if they cannot put the label of the same size and closed each other on promotional adv, website, etc.etc.	7.1 The FSC trademarks shall not be used together with the marks of other forest certification schemes in a way that is disadvantageous to the FSC trademarks in terms of size or placement.
7.1		The FSC trademarks shall not be used together with the marks of other forest certification schemes in a way which implies equivalence or in a way which is disadvantageous to the FSC trademarks in terms of size or placement. Please Stop arguing as in a nursery school.	"...way which is disadvantageous" This notion is too vague and subject to too many interpretations.
7.1	G	See comments for 4.6	Deletion

7.1 (old)	T, G	Some stakeholders (mainly CHs) expressed their concerns about the risk that the FSC certification could be used only as green washing/marketing strategy by some others, that do not actually implement the FSC certification. In order to overcome this possible (and real) issue, some suggestions have been raised.	<ul style="list-style-type: none"> <li>- The Clause should be maintained, widening the time-span up to 24 months. In such a way, the time-span would be aligned with the possibility to waive the annual audit when no certified material has been produced/sold.</li> <li>- Even if no production, labelling or selling activities of FSC certified material occurred, at least the purchase of certified material should occur, in order to make the general promotion possible. In such a way, at least some reference to an actual certified productive process would be granted.</li> <li>- If the requirements will be hopefully maintained, maybe extending the time-span, it could be required that, if no production/selling activities took place, an active promotion (e.g. website, catalogues, etc.) of those products and/or product lines that are potentially certified should be compulsorily required, in order to perform the general promotion.</li> <li>- Please, note that a certified forest "produce" certified material, even though no productive processes sensu stricto occur. Thus, the scope of this Clause should be restricted to COC certificates, excluding FM and FM/COC certificates.</li> <li>- CW material is not actually "certified", but CHs need to be certified in order to purchase/sell it with the relevant claim. Though no trademark use is allowed with reference to CW (except the relevant declaration in selling documents), the scope of the Clause concerning the general promotion of the company may be broadened, embracing all the possible FSC-related activities.</li> </ul>
7.1 (old)	T, G	Some stakeholders (mainly CHs) expressed their concerns about the risk that the FSC certification could be used only as green washing/marketing strategy by some others, that do not actually implement the FSC certification. In order to overcome this possible (and real) issue, some suggestions have been raised.	<ul style="list-style-type: none"> <li>- The Clause should be maintained, widening the time-span up to 24 months. In such a way, the time-span would be aligned with the possibility to waive the annual audit when no certified material has been produced/sold.</li> <li>- Even if no production, labelling or selling activities of FSC certified material occurred, at least the purchase of certified material should occur, in order to make the general promotion possible. In such a way, at least some reference to an actual certified productive process would be granted.</li> <li>- If the requirements will be hopefully maintained, maybe extending the time-span, it could be required that, if no production/selling activities took place, an active promotion (e.g. website, catalogues, etc.) of those products and/or product lines that are potentially certified should be compulsorily required, in order to</li> </ul>

			<p>perform the general promotion.</p> <ul style="list-style-type: none"> <li>- Please, note that a certified forest "produce" certified material, even though no productive processes sensu stricto occur. Thus, the scope of this Clause should be restricted to COC certificates, excluding FM and FM/COC certificates.</li> <li>- CW material is not actually "certified", but CHs need to be certified in order to purchase/sell it with the relevant claim. Though no trademark use is allowed with reference to CW (except the relevant declaration in selling documents), the scope of the Clause concerning the general promotion of the company may be broadened, embracing all the possible FSC-related activities.</li> </ul>
7.1 (old)	T, G	<p>Some stakeholders (mainly CHs) expressed their concerns about the risk that the FSC certification could be used only as green washing/marketing strategy by some others, that do not actually implement the FSC certification. In order to overcome this possible (and real) issue, some suggestions have been raised.</p>	<ul style="list-style-type: none"> <li>- The Clause should be maintained, widening the time-span up to 24 months. In such a way, the time-span would be aligned with the possibility to waive the annual audit when no certified material has been produced/sold.</li> <li>- Even if no production, labelling or selling activities of FSC certified material occurred, at least the purchase of certified material should occur, in order to make the general promotion possible. In such a way, at least some reference to an actual certified productive process would be granted.</li> <li>- If the requirements will be hopefully maintained, maybe extending the time-span, it could be required that, if no production/selling activities took place, an active promotion (e.g. website, catalogues, etc.) of those products and/or product lines that are potentially certified should be compulsorily required, in order to perform the general promotion.</li> <li>- Please, note that a certified forest "produce" certified material, even though no productive processes sensu stricto occur. Thus, the scope of this Clause should be restricted to COC certificates, excluding FM and FM/COC certificates.</li> <li>- CW material is not actually "certified", but CHs need to be certified in order to purchase/sell it with the relevant claim. Though no trademark use is allowed with reference to CW (except the relevant declaration in selling documents), the scope of the Clause concerning the general promotion of the company may be broadened, embracing all the possible FSC-related activities.</li> </ul>

7.2	G	I can easily see the problem about confusing with FSC promotional panels on sales documents or purchase documents for the receiving part. However, a lot of CHs actually promote themselves by using this on templates etc. because they are proud of being FSC certified – don't take this away from them.	Deletion
7.2	T	RA welcomes the new trademark standard, which is more relaxed in the trademark restrictions. However, RA strongly urges the removal of this requirement as it stands, until the results of the Motion 36 study are ready. Changes to invoice templates is very costly to CHs. A significant amount of our CHs use the promotional panel on their invoices, or written FSC promotional claims, and a significant financial impact will result if this requirement passes. CHs recently had to change their invoicing systems to accommodate "FSC Mixed" to "FSC Mix," and were upset with the extra cost for a minimal change. They will be frustrated with another minor change. Furthermore, invoices and packing slips are B2B, not consumer facing, thus does not address Motion 36. Invoices and packing slips are a main way that companies communicate to their customers, and are one of the limited options for marketing/advertising. This is an avenue to increase the demand of FSC-certified products. If companies have to promote their certification elsewhere, it is another financial strain in addition to paying for certification.	Deletion
7.2	G	For many certificate holders, adding the FSC logo to invoices and other documentation has been an excellent way to advertise to their existing customers that they have FSC certified products available. In the US, many certificate holders are terminating their certificates due to lack of demand for FSC products. We encourage certificate holders to promote their FSC certification and have numerous certificate holders that are using the FSC trademarks on invoices and other documents for this reason. Disallowing certificate holders to promote their certification in this way will likely cause issues similar to what we saw with the restriction on promotional trademark use on business cards, which has now been reversed. Additionally, it will take time to phase out all of the already printed stock, if this is no longer allowed.	Deletion
7.2	G	Many companies changed the position of the FSC promotional labels on sales documents after the issue of the standard FSC-STD-50-001 v1-2. Most of the company shall call and pay a technician in order to modify these documents and they comply with CBs because they had to change the entire template to put the label behind the address and company's logo. They will not be happy to change again the template and they will probably leave the PEFC label.	
7.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Many CHs use printed letter paper for both letters and invoices. It is unproportioned to expect that such CHs will use 2 different types of letter paper just because of TM standards. This clause will therefore limit the potential TM use.	Deletion

7.2	G	Other certification schemes allow promotion on sale documents. FSC needs any further promotion including the risk of wrong interpretation. Most SME clients use only two ways for promoting any certification – sale documents and web pages. Why to remove the cheapest way of promotion? Many clients are certified but not supplying certified products because they do not agreed prices. But they can promote their ability to supply certified products.	Removal Or “Allowed for invoices and not allowed for delivery notes” Or “Allowed for invoices and not allowed for delivery notes if delivery notes do not contain certified products.”
7.2	T	Does this mean Promotional Panels only or does it include the tick tree and licence code (if minimum elements are used)? What about the disclaimer that was needed ‘Only the products marked as such are FSC certified’. Is that needed on sales documents?	Clarify what is meant by ‘for promotion’
7.2	G	Prohibition of label use on invoice templates creates huge costs and trouble for smaller companies who are using only one stationery template for all types of communication. This may appear as obstacle for SLIMF companies while favouring rather large enterprises.	Keep old regulation.
7.2	G	Many company like to use promotional panel on invoice. Let do it with more clear rules	
7.2	G	Why not leaving the opportunity of promoting FSC by sales and delivery documents? These represent a good mean of promotion. There is no risk that trademark create confusion about what is certified and listed on the document	Deletion
7.2	G	The use of the promotional label on invoices, delivery notes, or similar documents can help organizations to promote the certification status. The FSC promotional trademarks should be used on this kind of documents.	
7.2	T	Promotional panel should be used on invoices as well	Deletion
7.2	G	Under the current states: If the FSC trademarks are used on invoice templates, delivery notes and similar documents that may be used for FSC and non-FSC products, the following statement shall be included: “Only the products that are identified as such on this document are FSC certified”. Thus, even under the current standard, what is FSC certified is to be clearly indicated to avoid confusion. There are many CHs in Japan use FSC trademark on their sales document templates, and they will be forced to discard a lot of unused material just because of this new clause 7.2. That would be huge financial loss to them, and that would lead to dissatisfaction toward FSC system.	Clause 7.5 in the current 50-001 should be maintained.
7.2	T,G	For many companies the invoices are an important way through which they promote themselves. Each certification holder has to verify which products listed in invoices are certified and the staff that check documents has to be trained about that. Finally are you sure that it is a good choice leave invoices to trademarks of other forest certification schemes (PEFC, for example)?	Deletion

7.2	T,G	<u>All</u> stakeholders, either CBs, consultants or CHs (except one), strongly rejected and objected to this proposed change, arguing that often the invoices are the first and pre-eminent way through which the company promotes itself. Theoretically, CHs should be aware that only products listed as such are certified, so general promotion would not create confusion about what is certifies, and what is not. If such confusion arises, it relates with a non-compliance by recipient CHs with those Clauses in FSC STD-40-004 concerning the need for all relevant company staff to be trained on the FSC system – trademark use by invoicing CHs should not be affected. Furthermore, a challenging question: why should FSC decide to leave room only for trademarks of other forest certification schemes (e.g. PEFC), whilst turning down only its own trademark and visibility?	All stakeholders, either CBs, consultants or CHs (except one), strongly rejected and objected to this proposed change. The newly proposed requirement should be rejected.
7.2	G	. The FSC trademarks shall not be used on invoices, delivery notes, or similar for promotion. Chain of custody claims are not regarded as promotion. I need some explanations ...	Is the Text claim with licence code allowed, ? e.g. 'We have FSC certification (FSC® C#####)'. on all promotional materials of a company ?
7.2	G	It should be possible to place label or trademarks on invoices. Reason: Often same template is used for letters and invoices so that promotion on normal correspondence would not be possible any more unless extra template (causing additional costs and thus unrealistic) would be used.	Deletion
7.2	T	The other certification standards are not at this time limiting promotional use. This standard needs to be written in a clear manner that allows "FSC" to be in product descriptions and line items for the product when the product invoiced follows requirements of the 40-004 standard. The type of trademark use that is not allowed needs to be more clearly called out.	Highlight examples of what FSC wants to avoid and why.
7.2	T	Using FSC trademarks on invoices or delivery notes is not just a question of promotion but it is also a way of informing the customer or the end-user that the product he bought / received is FSC-certified. Moreover, the buyer of the product is not always its end-user (ex: when a printer buys FSC-certified paper for an end-user, the end-user never sees the reel before printing - he only receives its order with the printed paper => without the info on the invoices and on the delivery notes, he cannot be sure that the used paper is FSC-certified).	If the use of the logo is forbidden because too promotional, the use of a sentence on the invoices / delivery notes such as "this product is FSC certified" could be a good compromise and is necessary for the end-user of the product.
7.2	G	Some printers like to use the promotional trademark on their delivery notices and invoices even if the job delivered and invoiced is not an FSC job. The reason for this is often this is the only promotional material their customers receive and they wish to remind them they are an FSC certified printer.	Change 7.2 to define an explicit placement of the promotional trademark on delivery notices and invoices. i.e. can only be placed at the bottom of the delivery notice or invoice using the explicit promotional text OR Eliminate 7.2 entirely and include reference to delivery notices and invoices with the specific requirement outlined for business cards (7.3 The FSC logo or marks shall not be used on business cards, delivery notices, invoices for promotion. Text claim with licence code is allowed, e.g. "we have FSC certification (FSC#C#####))
7.2	T,G	<u>All</u> stakeholders, either CBs, consultants or CHs (except one), strongly rejected and objected to this proposed change, arguing that often the invoices are the first and pre-eminent way through which the company promotes itself. Theoretically, CHs should be aware that only products listed as such are certified, so general promotion would not create confusion about what is certifies, and what is not. If such confusion arises, it relates with a non-compliance by recipient CHs with those Clauses in FSC STD-40-004 concerning the need for all relevant company staff to be trained on the FSC system – trademark use by invoicing CHs should not be affected. Furthermore, a challenging question: why should FSC decide to leave room only for trademarks of other forest	All stakeholders, either CBs, consultants or CHs (except one), strongly rejected and objected to this proposed change. The newly proposed requirement should be rejected.

		certification schemes (e.g. PEFC), whilst turning down only its own trademark and visibility?	
7.2	T	Promotion should be allowed in invoices .... This is a great opportunity to reach people.	Delete this paragraph
7.2	T	<p>This change will do much more harm than good. FSC trademark use is low. Increased use helps build the FSC brand and awareness. We need to encourage FSC trademark use by making it easier to use.</p> <p>We have chosen to remove two restrictions on logo use via allowing logo use on letterhead, stationary (old 4.1), and business cards (7.3). This is a positive change.</p> <p>Adding logo use restrictions on invoices (7.1) goes in the opposite direction. It does not make sense to relax the standard in two places.</p> <p>Adding restrictions on logo use on invoices in advance of the motion 36 study negates the value we're hoping to gain from the study.</p> <p>We passed motion 36 but we also passed motions to support smallholders and businesses. Restricting logo use on invoices directly harms these holders and businesses. For many small businesses the invoice is the only place they promote their FSC certification. They have no marketing budget and 20% of the small businesses I work with have no website. The only marketing they do is word of mouth and FSC logo use on their invoice template. We already require inclusion of the statement "only items identified as such is FSC certified" to ensure clarity when businesses make invoice promotions.</p> <p>If a business is in good standing and is proud of their FSC certification we need them to be using the FSC logo.</p> <p>Restriction of limited promotional opportunities is the wrong direction to be going in. We only hurt the businesses that have chosen to take part in certification.</p>	Deletion
7.2	T	<p>This change will do much more harm than good. FSC trademark use is low. Increased use helps build the FSC brand and awareness. We need to encourage FSC trademark use by making it easier to use.</p> <p>We have chosen to remove two restrictions on logo use via allowing logo use on letterhead, stationary (old 4.1), and business cards (7.3). This is a positive change.</p> <p>Adding logo use restrictions on invoices (7.1) goes in the opposite direction. It does not make sense to relax the standard in two places.</p> <p>Adding restrictions on logo use on invoices in advance of the motion 36 study negates the value we're hoping to gain from the study.</p> <p>We passed motion 36 but we also passed motions to support smallholders and businesses. Restricting logo use on invoices directly harms these holders and businesses. For many small businesses the invoice is the only place they promote their FSC certification. They have no marketing budget and 20% of the small businesses I work with have no website. The only marketing they do is word of mouth and FSC logo use on their invoice template. We already require inclusion of the statement "only items identified as such is FSC certified" to ensure clarity when businesses make invoice promotions.</p> <p>If a business is in good standing and is proud of their FSC certification we need them to be using the FSC logo.</p> <p>Restriction of limited promotional opportunities is the wrong direction to be going in. We only hurt the businesses that have chosen to take part in certification.</p>	Deletion

		Examples are "Wood from well-managed forests" for an FSC certified wooden item in non-FSC certified packaging (100% label) or "Packaging from responsible sources" in the case of a non-FSC certified product in FSC certified packaging (Mix label) or "Paper made from recycled material" for a publication (Recycled label).	
7.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Many CHs use printed letter paper for both letters and invoices. It is unproportioned to expect that such CHs will use 2 different types of letter paper just because of TM standards. This clause will therefore limit the potential TM use.	Deletion
7.2	T	Tembec uses FSC trademarks on their invoices and delivery notes for all their FSC certified lumber sales. It is a promotional tool for the sale of FSC certified products.	Keep the use of FSC trademark on sale and delivery documentation but only for actual sales of FSC certified products.
7.2	G	Support this change	
7.2	G	This section is important for the implementation of motion 36 approved at the 2014 General Assembly and we find it important to maintain.	
7.2	G	We support this section.	
7.2	G	As noted, this section responds to motion 36 approved at the 2014 General Assembly; this clause should be retained in the document.	N/A
7.2	G	At the information meeting there was understanding for the proposed restriction and the reason behind.	
7.2	E	FSC Denmark believes it is unclear if the inclusion of a disclaimer like "Only the products that are identified as such on this document are FSC certified" and a company's CoC number "ABC-CoC-123456" in invoice and delivery note templates for all products (FSC certified or not) because CoC-code cannot be added to product description line because of space limitations or such, is acceptable under this new clause.	Add that disclaimer like the one written in this comment allowed / or not regarded as promotional claim.
7.2	G	"Chain of custody claims" Should be changed to "FSC claims". "FSC Claim" is a defined term.	FSC claims are not regarded as promotion.
7.2	T	I strongly disagree with this clause. The motion 36 does not ask for prohibiting promotion on invoices, delivery note and similar documents. It asks to address the confusion in the market. Frankly speaking, I do understand that there are people who tries to make their uncertified product look as if they are certified. But banning the promotional use of TM on invoice is not the best solution. FSC has introduced these bans in the past regarding business card and companies without FSC handling in the past 12 month. Now these restrictions have been removed. Any restrictions like these will only make CHs think FSC is user unfriendly. Besides, there are many companies which are already using promotional panels on invoices and delivery notes. The impact of this clause is huge. This confusion should not happen if auditing according to the clause 7.5 of the current standard is properly functioning. The reason for this clause to be not effective is not only companies trying to cheat on the system but also the quality of audit. So this issue can be solve by ASI watching more carefully about this clause. In some culture, this is very strong promotional tool. (like business card). So there must be a way to promote FSC certification via these documents.	Come up with alternative methods to address the issue so that it becomes harder to cheat on the system. Followings are some suggestions. -introduce a standard disclaimer wording which has to be used on invoices and delivery note in case FSC TM is used for promotion. - allow the use of FSC TM on invoices and delivery notes if all items listed on the documents are FSC certified. -For invoice and delivery note, no self-approval is allowed but the design has to be approved by CB.

7.2	T	<p>The restriction that the FSC trademarks shall not be used on invoices etc. is disapproved by most of the CH's.</p> <ul style="list-style-type: none"> <li>- Invoice is often printed on corporate stationery</li> <li>- It offers particularly smaller companies the opportunity to promote their FSC-certified status (tenders, invoices are well read documents B2B!)</li> <li>- If this restriction stays in place it affects all corporate doc's</li> <li>- If this restriction stays in place the FSC-logo will be removed of corporate stationery (whereas other logos will remain, such as PEFC)</li> <li>- As this refers to Motion 36 (deceptive practises) FSC should (shall) not punish the good for the bad</li> <li>- Tackle the issue where the risk of deceptive practices is highest; the CH's assume that a similar (risk based) approach is applicable here as is the case for Transaction Verification!</li> </ul>	Drop this clause.
7.2	G	It is important that invoices doesn't look like they are issued by FSC or that uncertified products sold can be understood as they are certified. Such a statement is better than a prohibition of label-use on invoices. We have added an invoice were the certified company makes a promotional claim for all services delivered, which are many. If the FSC-logo is not allowed this will look like the company provide a lot of services but not FSC.	Rewrite so that the FSC-logo can be put on an invoice without confusing the reader to think an uncertified product is certified or that FSC is involved in issuing the invoice.
7.2	G	Although it would be more subjective, could this be addressed through wording such as "The FSC trademarks shall not be used in invoices, delivery notes or similar in such a way as to cause confusion as to what they relate to"?	Consider alternative wording to allow for trademarks to be used as long as there is no confusion as to what they relate to.
7.2		Current provisions that allow the use of the FSC TM on invoices or delivery documents with additional text statement should be still possible. The issue that confusion can be caused whether a product or a company is certified is not seen as relevant.	
7.2	T,G	<u>All</u> stakeholders, either CBs, consultants or CHs (except one), strongly rejected and objected to this proposed change, arguing that often the invoices are the first and pre-eminent way through which the company promotes itself. Theoretically, CHs should be aware that only products listed as such are certified, so general promotion would not create confusion about what is certifies, and what is not. If such confusion arises, it relates with a non-compliance by recipient CHs with those Clauses in FSC STD-40-004 concerning the need for all relevant company staff to be trained on the FSC system – trademark use by invoicing CHs should not be affected. Furthermore, a challenging question: why should FSC decide to leave room only for trademarks of other forest certification schemes (e.g. PEFC), whilst turning down only its own trademark and visibility?	All stakeholders, either CBs, consultants or CHs (except one), strongly rejected and objected to this proposed change. The newly proposed requirement should be rejected.
7.2	E	Remove this clause. This type of promotion is very important to certificate holders, especially small companies that have little capacity or resources for marketing. Invoice promotion is one of the few vehicles that these companies have to promote their certification.	The addition of required language to the standard to be used with the promotional panel is a safeguard that could prevent confusion. This required language could be: 'only product marked as such are FSC certified.'
7.2		Why not allow promotional use on invoices? How better to let potential customers know that they can contact you for FSC certified materials? I don't think this is going to do anything toward eliminating confusion in the marketplace. Nor do I think FSC should be restricting marketing opportunities when we can use all the help we can get at the moment.	Deletion

7.2	E	Promoting oneself as FSC certified on invoices is a great option. Not allowing this eliminates a great opportunity for CHs.	Allow the promotional use on invoices with an additional disclaimer such as 'Please ask about FSC® Certified products'. Or create one specific tagline that can be used by all to prevent any errors or misrepresentation.
7.2	T	Not permitting the use of promotional labels on invoices is a huge disservice, as this is a very efficient way of communicating to a customer that a company is certified and has the potential to provide certified products. It is very simple to establish rules to permit this while ensuring that there is no confusion that the products are certified.	Amend 7.2 to remove reference to invoices and permit the promotional logo to be used on invoices.
7.2	T, E	This section responds to motion 36 and should be retained.	
7.2		Current provisions that allow the use of the FSC TM on invoices or delivery documents with additional text statement should be still possible. The issue that confusion can be caused whether a product or a company is certified is not seen as relevant.	
7.3	T	RA requests a slight variation in wording, as there is limited space on business cards.	"We are FSC certified (FSC® C#####)"
7.3	G	Clients will be happy they can advertise on business cards again.	
7.3	E	It is too vague to say 'for promotion'. Use the Registration symbols in all examples where it should be used.	Clarify text to be transparent. Add Registration symbol to example 'We have FSC® certification'.
7.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
7.3	G	Why??? This doesn't make sense	remove this point
7.3	G	Agreed	
7.3		The FSC logo or marks should be allowed for usage on business cards,	Deletion
7.3	G	Introducing the possibility to promote the certification status of the company is welcomed.	
7.3	G	On the business card logo change; I would suggest looking at setting minimum sizes of current logo, such as proposed in your example of a pencil, to also apply to business card use. Having just a "text" mention of FSC, would detract from the brand FSC has worked so hard to protect. Allowing the small but legible logo, incorporating the text of their particular certification as "We have..." would be fair and appropriate.	
7.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
7.3	T, E	An unnecessary limitation to TM usage.	Deletion
7.3	T	FSC trademark use is low. Increased use helps build the FSC brand and awareness. We need to encourage FSC trademark use by making it easy to use. This change is relevant in relation to Motion 36. We are performing a study to look at confusion in the marketplace. Originally use on business cards was restricted because we worried about marketplace confusion. Removing restrictions on logo use on business cards in advance of the study negates the value we're hoping to gain from the study.	No change. I support removal of restrictions on business card logo use.

7.3	T	FSC trademark use is low. Increased use helps build the FSC brand and awareness. We need to encourage FSC trademark use by making it easy to use. This change is relevant in relation to Motion 36. We are performing a study to look at confusion in the marketplace. Originally use on business cards was restricted because we worried about marketplace confusion. Removing restrictions on logo use on business cards in advance of the study negates the value we're hoping to gain from the study.	No change. I support removal of restrictions on business card logo use.
7.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
7.3	T	n.a.	It may be specified that the promotional disclaimer is allowed even if the business card is not FSC certified. Even better, it may be asked that also the business card should be FSC certified, in order to use such disclaimer.
7.3	T	n.a.	It may be specified that the promotional disclaimer is allowed even if the business card is not FSC certified. Even better, it may be asked that also the business card should be FSC certified, in order to use such disclaimer.
7.3	T	I do not see any reason or risk for banning the use of FSC logo and mark on business card. If initial "FSC" or phrase "Forest Stewardship Council" are ok and logo is not, there must be a clear difference between these trademarks in terms of the reason for which the use of FSC TM on business card was banned in the first place. I do not see any difference in these trademarks. We should not ban one trademark and allow others.	Allow use of all trademarks on business card unless there is clear reason for banning specific ones. If there is any reason for banning specific trademark, then the reason must be communicated.
7.3	T	Unacceptable if a claim of being an FSC-certified company on a business card is produced on a card made of non-certified paper.	Make use of FSC-certified paper for business cards obligatory if a claim about the FSC-certified status is made on the business card.
7.3	G	Maybe add here that the mini-label can be used on business cards	Add reference to mini-label
7.3	T	n.a.	It may be specified that the promotional disclaimer is allowed even if the business card is not FSC certified. Even better, it may be asked that also the business card should be FSC certified, in order to use such disclaimer.
7.3	G	Allowing promotion on business cards is a welcome addition. However, the suggested text is not suitable and could lead customers to believe that all products are certified. The text example given in the clause should be the text that is required to be used by certificate holders.	Change clause to: The FSC logo or marks shall not be used on business cards for promotion. Text claim with license code is allowed. The following text should be used 'We sell FSC-certified products'
7.3		Allow promotional logos on business cards, or restrict logos to only on-product labels. Either option at least makes some sense. This straddling of the business card fence is pointless. Having said that, I think it's ridiculous that you have to have the promotional logo at all. You should always allow promotional statements without the logo, on anything. So, much like 3.6, stop just adding random exceptions.	Deletion
7.3	E	FSC is leaving this too open – come up with specific statements that are acceptable for people to use, or one specific line. Otherwise, CHs are going to want to make up their own statements that FSC doesn't approve of	Create and include specific tagline(s)
7.3	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Deletion

7.4	T, E	This is not in the sense of simplification. The times that FSC was associated with e.g. "The Frog" are in the past. This clause does not reflect the present and should be deleted.	Deletion
7.4	T, E	This is not in the sense of simplification. The times that FSC was associated with e.g. "The Frog" are in the past. This clause does not reflect the present and should be deleted.	Deletion
7.4	G	We welcome the simplifications by the removed sections and particular the removal of the former section 7.1 and 3.4. The former section 7.1 has caused several conflicts between competent bodies and newly certified companies.	
7.4	T, E	This is not in the sense of simplification. The times that FSC was associated with e.g. "The Frog" are in the past. This clause does not reflect the present and should be deleted.	Deletion
7.4	T	Can you define "certification body logo"?	
7.4	T	I have never come across any CHs who want to promote their FSC certified products with CB's logo alone. In fact I have never come across any CHs who uses CB's logo for FSC certified products at all. SA and SW logos may be good candidates but even companies certified by them do not use their CB's logo. Besides, if a company wants to promote their certified products without FSC trademarks, they cannot promote in relation to FSC anyway. We cannot stop companies making promotional claims related to other things such as design or quality. I do not see any point of this clause.	Deletion
7.4	T	This is a ridiculous requirement. If an organisation chooses to use their CB logo on their certified products that should be their choice. In some cases, CB logos are more widely recognized than FSC logos (i.e., Rainforest Alliance). Use of On-product logos for FSC for the log and lumber industry is quite onerous and cumbersome, as for small organisations it requires multiple types of lumber wrap for the various claims. Use of a CB logo like Rainforest Alliance is simple and easy and can be facilitated with one type of wrap.	Remove requirement 7.4. Whether a company chooses to use the FSC on product logo or not should be at their discretion. Ditto for the CB logo.
7.5	G	The receiver of sales documents could easily think that all on documents are FSC certified if the FSC promotional label is used. This is of course only needed if the FSC promotional panel are allowed on sales documents.	Do not delete.
7.5 (old)	T	In order to avoid possible misunderstandings on what is certified and what is not, current Clause 7.5 should be maintained as a recommendation, every time an invoice lists both certified and not-certified products (and not only if general promotion is present).	<10 mm dimensions should be allowed for the tick-and-tree logo, in line with the proposed comment.
7.5 (old)	T	In order to avoid possible misunderstandings on what is certified and what is not, current Clause 7.5 should be maintained as a recommendation, every time an invoice lists both certified and not-certified products (and not only if general promotion is present).	<10 mm dimensions should be allowed for the tick-and-tree logo, in line with the proposed comment.
8. Label and logo		Insert an introduction, as the structure of the proposed standard on the use of the FSC trademarks , clarifying this points: -the preferred colors are available on Label generator; -do not change their original proportions. However, it can be enlarged or reduced , keeping the minimum size defined in the standard. -If Necessary, other colors may be used provided that it maintains the contrast material. -include Images with shapes and colors -include The 8.9 here because it is unverifiable requirement	Insert the introduction and delete requirements
8. Label and logo	G	We encourage FSC to publish separate guidance documents showing examples on both correct and wrong use of the FSC label. The guidance documents should be separated from the standard, so that continual updating is possible. Furthermore, the guidance documents should be targeted specific segments so there is one for printing, one for furniture production etc.	

8. Label and logo	G	The proposed changes with regards to free use of mini label and full label and new size requirements are welcomed by certificate holders.	
8. Label and logo	E	FSC Denmark and participants at the information meeting do not think it is clear if the size rules and other requirements from this section also applies for use of promotional panel (8.5, 8.6 and alike)	Consider to rewrite the headline "FSC on-product label and checkmark-and-tree logo" or make it explicit in some other way.
8. Label and logo	G	Take away the web-address in the logo. This makes FSC look old style. Today all computer users are competent to search the net.	Take away the web-address from the label.
8. Label and logo	G	The specific required and optional label elements for both the full and mini labels should be added. If the required elements are not specifically listed, there is a potential for confusion and inconsistent interpretation.	Add a clause or clauses to the draft that are similar to 3.2 and 3.4 in the current standard.
8.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use FSC on-product label and FSC logo in the following colour variations:
8.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use FSC on-product label and FSC logo in the following colour variations:
8.1	T	color restrictions are one important bureaucracy point to be reduced. Evaluate and provide evidence why this rule is so important for the credibility of FSC .	delete "shall" . Should be sufficient to allow contrast and readability
8.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use FSC on-product label and FSC logo in the following colour variations:
8.1	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended that FSC on-product label and FSC logo shall have the following colour variations:
8.1, 8.2		Change the term "shall" and insert preferred.	Clarify there´s preferred colors on Label Generator
8.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use For the green colour for reproduction the Pantone 626C (or R0 G92 B66 / C81 M33Y78 K28) is recommended.
8.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use For the green colour for reproduction the Pantone 626C (or R0 G92 B66 / C81M33Y78 K28) is recommended.
8.2	T	this is not realistic if you aim for plenty logo uses	Deletion
8.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use For the green colour for reproduction the Pantone 626C (or R0 G92 B66 / C81 M33Y78 K28) is recommended.
8.2	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use For the green colour for reproduction the Pantone 626C (or R0 G92 B66 / C81 M33Y78 K28) is recommended.
8.3	T	Remove word 'darkest'	Replace 'most suitable'
8.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended that if standard colours are not available, the darkest available colour on a solid no patterned background be used provided the contrast allows legibility. The label may be produced in positive or negative versions.

8.3	G	Company should be more free to use different colours to make the FSC logo more adaptable to the product. In this way the logo can be used often	
8.3		unnecessary and complex	Replace by : The logo should have contrast in backgrounds, including photographic background.
8.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use For the green colour for reproduction the Pantone 626C (or R0 G92 B66 / C81M33Y78 K28) is recommended.
8.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended that if standard colours are not available, the darkest available colour on a solid no patterned background be used provided the contrast allows legibility. The label may be produced in positive or negative versions.
8.3	T	This clause should be expanded to include any dark colours that provide enough contrast to be legible. The goal is that the FSC label is used and is easy to read, and any colour that provides adequate contrast achieves this goal.	Change clause to: "If the standard colours are not available, a dark colour that provides enough contrast to be legible will be used. The label may be produced in positive or negative versions."
8.3		This clause is one of the big four (Size, color, spacing, placement). In the print industry, it creates more arguments between CHs and CBs (and CHs and their customers) that anything other than sizing. "Darkest available color" can be completely subjective, and customers of CHs hate the restriction. The only thing worse than this clause was the prior lack of any clause (when green and black were the only options). Change this to only have a legibility requirement.	If standard colours are not available, an available colour may be used, provided the contrast allows legibility. The label may be produced in positive or negative versions.
8.3	E	Darkest colour is also prohibitive and there have been instances where the CH and CB have different in opinion.	Revise this to allow any legible colour that is included in the print process.
8.3	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended that if standard colours are not available, the darkest available colour on a solid no patterned background be used provided the contrast allows legibility. The label may be produced in positive or negative versions.
8.4	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended that where no unprinted white areas are available, the label elements may be reproduced in black or white on a background colour that provides sufficient contrast.
8.4		unnecessary and complex	Replace by : The background of the label may not be transparent , it must be in a solid nonpatterned
8.4	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended that where no unprinted white areas are available, the label elements may be reproduced in black or white on a background colour that provides sufficient contrast.
8.4	T	Important to allow other colors as well.	Change
8.4	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended that where no unprinted white areas are available, the label elements may be reproduced in black or white on a background colour that provides sufficient contrast.
8.4	G	Clarification has made this interpretation easier.	

8.4		Why only black and white? Does this overrule clause 8.3? Why not just leave it tied to contrast?	Where no unprinted white areas are available, the label elements may be reproduced on a background colour that provides sufficient contrast.
8.4	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended that where no unprinted white areas are available, the label elements may be reproduced in black or white on a background colour that provides sufficient contrast.
8.4, 8.8, 8.11	G	The term "label elements" must be defined. For those who are familiar with the current standard, it is clear that label elements are elements described under clause 3.2 of the current standard. However, this draft revised standard does not mention anything about elements of the labels. For those who are new to FSC will not know what the elements are (i.e. logo, FSC website, title, text, license code)	The term "label elements" must be more clearly defined in the standard. (Clause 3.2 of the current standard). When I say "define", I do not mean include the definition in Annex 4, but include the definition in the body of the standard.
8.5-8.12	T	The structure of this Section 8 is confusing and needs to be made clearer. 8.5-8.11 Subheading "Size and format of the labels" - does this refer to on-product labels AND promotional label? Please clarify. 8.12 Subheading "Size of the logo" it is not immediately obvious that this relates to promotional use of tickmark-and-tree logo. The headlines don't match the headline "8 FSC on-product label and checkmark-and-tree logo". Perhaps you could split section 8 into section for On-product labels and section on Promotional label. There will be repetition but you will gain better clarity. Or make the headings clearer.	
8.6	T	Remove this clause and just go with clause 8.7 which states 'legibility is maintained'. That is the key issue not measuring labels to 0.5 of a mm.	Combine clauses 8.6 and 8.7 to say 'FSC labels shall be printed at a size at which all elements are legible. The minimum sizes are 9mm for portrait and 6mm for landscape format providing legibility is maintained. (include picture)
8.6	G	Please add size requirements for full sized labels.	
8.6	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Minimum sizes should not be prescribed. The most important aspect is that the TML Code is legible.	Modification: FSC labels shall be printed at a size at which the trademark licence code is legible. Delete: Minimum size for the label shall be: (a) in portrait format 11 mm in width (b) in landscape format 8 mm in height.
8.6	G	We support the new size requirements	
8.6		The labels should maintain the text as obligatory (see DP comment) The size may be reduced to 15mm in vertical and 10mm in horizontal, and maintain the same rules to mini label	Consider it
8.6	T	The minimum size is too much prescriptive and does not simplify trademark use. Keeping the trademark approval by CBs is possible that minimum size be conditioned to the legibility of TM license code. This would simplify a lot the use of trademark and the standard itself, removing the concern of standardize all cases, and letting this in behalf of CB's trademark experts.	8.6. FSC labels shall be printed at a size at which all elements are the trademark license code is legible. <del>Minimum size for the label shall be:</del> <del>(a) in portrait format 11 mm in width</del> <del>(b) in landscape format 8 mm in height.</del>
8.6	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Minimum sizes should not be prescribed. The most important aspect is that the TML Code is legible.	Modification: FSC labels shall be printed at a size at which the trademark licence code is legible. Delete: Minimum size for the label shall be: (a) in portrait format 11 mm in width

			(b) in landscape format 8 mm in height.
8.6	G	The proposed minimum sizes are a great advantage for license holders in the printing industry and their customers.	
8.6	G	Allowing a smaller rendition of the label will cause more products to eventually be labelled in the marketplace and designers to work FSC labels into places where trademarks have previously been avoided due to current standard interpretations.	Keep minimums at proposed sizing
8.6	T	The labels print off at larger than the minimum size within the document on a standard sheet. I think that having them at minimum size within the document should occur so that it is clear what is being allowed.	Align artwork within document at proposed minimum sizes or provide a disclaimer so that it is better understood.
8.6	T	Not helpful to have the minimum size requirements. Readability should be the key point- this depends on the product and printing technology used. delete sizing requirements	Change wording
8.6	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Minimum sizes should not be prescribed. The most important aspect is that the TML Code is legible.	Modification: FSC labels shall be printed at a size at which the trademark licence code is legible. Delete: Minimum size for the label shall be: (a) in portrait format 11 mm in width (b) in landscape format 8 mm in height.
8.6	G	Agree with changes: Minimum sizes for mini and standard as a general.	
8.6	T	The minimum size is too much prescriptive and does not simplify trademark use. Keeping the trademark approval by CBs is possible that minimum size be conditioned to the legibility of TM license code. This would simplify a lot the use of trademark and the standard itself, removing the concern of standardize all cases, and letting this in behalf of CB's trademark experts.	8.6. FSC labels shall be printed at a size at which <u>all elements are the trademark license code is legible.</u> <del>Minimum size for the label shall be:</del> <del>(a) in portrait format 11 mm in width</del> <del>(b) in landscape format 8 mm in height.</del>
8.6		Sizing is the number one trademark related issue stopping usage in the US print industry.	FSC labels shall be printed at a size at which the trademark license code is legible.
8.6	E	Examples here under sizing are only MINI elements which is confusing and appears that these are the only labels	Also use the full labels here in the sizing, and clarify the language 'Minimum size for the full and mini labels shall be:'
8.6	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification. Minimum sizes should not be prescribed. The most important aspect is that the TML Code is legible.	Modification: FSC labels shall be printed at a size at which the trademark licence code is legible. Delete: Minimum size for the label shall be: (a) in portrait format 11 mm in width (b) in landscape format 8 mm in height.
8.6, 8.7	G	welcomes the changes and additions suggested.	
8.6, 8.7	G	Metsä Group welcomes the changes and additions suggested.	
8.6, 8.7	G	SE WSF welcomes the changes and additions suggested.	
8.6, 8.7	G	FFIF welcomes the changes and additions suggested.	
8.7	T	RA welcomes this size exception for the MINI label, and believes it prevent significant amount of special exception requests for these small packages. RA suggests a small edit to text for clarification.	"For small products where the paper size is below A5 or packaging size below 250 ml, the MINI label may be used at minimum sizes of 9 mm for portrait and 6 mm for landscape format, providing that legibility is maintained."

8.7	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Minimum sizes should not be prescribed. The most important aspect is that the TML Code is legible. (See 8.6)	Deletion
8.7	T	Keeping the trademark approval by CBs is possible that minimum size be conditioned to the legibility of TM license code.	Deletion
8.7	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Minimum sizes should not be prescribed. The most important aspect is that the TML Code is legible. (See 8.6)	Deletion
8.7	T	Current minilabel sizes should stay smallest possible sizes; readability is hard below that size	Deletion
8.7	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. Minimum sizes should not be prescribed. The most important aspect is that the TML Code is legible. (See 8.6)	Deletion
8.7	G	This is a very important improvement, the new size options and optional text for the labels will make labelling a lot easier, but we don't agree with the rationale of having 250 as the maximum for this solution. 285 mL or 330 mL carton can also be very challenging in terms of free space for labelling.	We would like to see the micro-sizes being available for up to 500 mL or less.
8.7	G	Agree with changes, as per comment above : Occasionally customer content on primary packaging can make it difficult to 'fit' the FSC label in. Packaging supplied in Aus especially (EU similar) requires a lot of information to support the validity of the content and packaging.	
8.7	T	Keeping the trademark approval by CBs is possible that minimum size be conditioned to the legibility of TM license code.	Deletion
8.7	G	Graphic Rules 8.7 – Should be deleted – particularly if you have 8.8 in place	Deletion
8.7		Could we please also consider accepting officially the possibility of having the mini label either on the back of the top flap or on top of one of the two flaps that are visible when opening the packaging ?	
8.7	G	For small products where paper size is below A5 or packaging size below 250 ml, the minimum sizes are 9 mm for portrait and 6 mm for landscape format, providing that legibility is maintained. Current standard clearly indicates that A5 paper and 250ml packaging are included in the context of the clause.	For small products where paper size is A5 or smaller or packaging size of 250 ml or less, the minimum sizes are 9 mm for portrait and 6 mm for landscape format, providing that legibility is maintained.
8.7		This does not seem to encapsulate a reduced elements (mini) label. Is the intent to remove reduced elements all together? If not, this should be clarified.	
8.7	E	This requirement is specific to mini labels, yet the clause does not specifically reference them – left open for interpretation	Add clarification that this clause is only for mini label sizing.
8.7	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification. Minimum sizes should not be prescribed. The most important aspect is that the TML Code is legible. (See 8.6)	Deletion
8.8	T	RA welcomes this new option, providing more labelling flexibility. RA requests that the FSC logo is optional, in cases where the label cannot be created (i.e. laser printers, rough surface, etc.).	
8.8		Where technical problems arise in creating labels with multiple lines for small products (e.g. pens, pencils, make-up brushes), a one-line arrangement of mini-label elements may be used following the size guidance of the landscape label. Why do you need always to refer to "technical problems" ?	Your role is to establish the rules for size, color, etc... to create different valid logos Certified companies would be treated like adults, you must let them the choice between the different logos you have validated.

8.8	T	Can we add the possibility to use this one-line arrangement of mini label for some printed matters (wish cards and brochures) and for labels.	Where technical problems arise in creating labels with multiple lines for small products (e.g. pens, pencils, make-up brushes, labels and printed matter),
8.8	G	Allowing for a one line statement of the trademark is appropriate	
8.8	G	like the proposal but strange to see that this is what we proposed but which was rejected as not possible to receive approval.....	
8.8	T	Line arrangement This is something that would be very much appreciated by printers on brochures too, due to the request from their clients and lack of space. Moreover, claims and printers information are also often seen vertically. So with that rule, we either get a lot of misuses or lose visibility as the labels are not applied.	When technical problems arise, the line arrangement may be used as the last option both on small products or on printed materials either and preferably horizontally or vertically
8.8		Nice addition.	
8.9	G	Has the label generator been amended to remove hyphens in languages where hyphens are not acceptable?	Ensure language formats are acceptable in that language (eg don't use hyphens to split words)
8.9	T	why only four ? Propose to allow as many as needed.	Change to open
8.9	T	This is information only	Put in information box or take away
8.9		This isn't currently true. AFAIK, the label generator can currently only handle three languages.	
8.9	G	The FSC label generator is not allowing CHs to create a landscape label with 4 languages. Also, this does not apply to Mini labels, which was frequently questioned.	Unless this is to be fixed, this clause should be corrected.
8.10	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
8.10	T	Keeping the trademark approval by CBs is possible that minimum size be conditioned to the legibility of TM license code.	Deletion
8.10	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
8.10	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
8.10	T	Keeping the trademark approval by CBs is possible that minimum size be conditioned to the legibility of TM license code.	Deletion
8.10	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Deletion
8.10 e), 8.11		unnecessary and complex	Deletion
8.11	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
8.11	T	The label elements shall never be altered- with or without a border.	Revise "When the border is not used" to just say "The use of a border around the label is preferred. The label elements shall not be altered."
8.11	T	preferable is not a correct word for a standard. Board can or cannot be use	please make this point more clear
8.11	T	A new point should be included to define how can be used two labels on the same products. 2 examples: 1) A catalogue of wood certified company. The printer should used the on product label on the catalogue and the wood company should use the promotional panel labels can be present on a single product. 2) The paper packaging for a wooden products. Both can be certified.	A point should say that 2 labels can be present on a single product

8.11	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
8.11	G	We welcome the simplifications by the removed sections.	
8.11	T	not logic. it is required to use the labels from the online generator which have a border - and now it is said this can be changed ....	Align with 3.5
8.11	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
8.11	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Deletion
8.12	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. If 6mm is allowed, why make it difficult and also have 10mm for other situations. Have one size for all.	Modification: The minimum size of the tick-and-tree logo that is not part of an on product label should be calculated by the height of the logo and shall be 6 mm. Delete: (a) 10 mm, or (b) 6 mm, when used as an extra logo for paper size below A4, packaging below 1 litre, or to identify FSC-certified products as in 5.4.
8.12	E	Vague. Tick-and-tree logo??	Include the words 'height of the tick tree logo and initials FSC shall be....' (as well as the picture).
8.12	T	The identification of the size for the use of promotional use is now better (rather than the current standard). However this is not practical to use and approve, once you download the all label from the label generator, not a part of it. You should choose a size for considering all the label (as you have for the on-product labels). Only creates more possibilities of misuse	Define a size for the entire promotional logo, as you have for the on-product label
8.12		If 6mm is readable, leaving only 6 mm as minimum and include the label with the license code .	
8.12	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. If 6mm is allowed, why make it difficult and also have 10mm for other situations. Have one size for all.	Modification: The minimum size of the tick-and-tree logo that is not part of an on product label should be calculated by the height of the logo and shall be 6 mm. Delete: (a) 10 mm, or (b) 6 mm, when used as an extra logo for paper size below A4, packaging below 1 litre, or to identify FSC-certified products as in 5.4.
8.12	E	The reference to 5.4 for certified products is incorrect. There is not a 5.4 within this standard.	Reference correct clause or clauses
8.12	T	A specific request has been collected, i.e. to re-size also the tick-and-tree logo, allowing <10 mm dimensions. The same Clause 8.12 implicitly suggests that the readability can be maintained, as a minimum size of 6 mm is allowed in some particular cases. Basically, the request consists in widening such a possibility (also proposed Clause 8.6 ) gives a minimum height of 8 mm for landscape format labels).	<10 mm dimensions should be allowed for the tick-and-tree logo, in line with the proposed comment.
8.12	T	drop the minimum size requirement as readability should be enough. Not understandable why the tick tree in the label has 6 mm (mini label) but it is not allowed in this size as stand alone ....	Change wording
8.12	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. If 6mm is allowed, why make it difficult and also have 10mm for other situations. Have one size for all.	Modification: The minimum size of the tick-and-tree logo that is not part of an on product label should be calculated by the height of the logo and shall be 6 mm. Delete: (a) 10 mm, or (b) 6 mm, when used as an extra logo for paper size below A4, packaging below 1 litre, or to identify FSC-certified products as in 5.4.

8.12	T	A specific request has been collected, i.e. to re-size also the tick-and-tree logo, allowing <10 mm dimensions. The same Clause 8.12 implicitly suggests that the readability can be maintained, as a minimum size of 6 mm is allowed in some particular cases. Basically, the request consists in widening such a possibility (also proposed Clause 8.6 ) gives a minimum height of 8 mm for landscape format labels).	<10 mm dimensions should be allowed for the tick-and-tree logo, in line with the proposed comment.
8.12	T	This clause cites section 5.4, which does not exist in this document.	Please change this reference to the appropriate clause #.
8.12	T	There have been on going discussions about the size of promotional FSC logo on website. For those using a large screen computer to see the webiste, the logo appears large but for those using small screen computer, the logo appears small on their screen. The key is legibility. So as long as you can enlarge the trademark elements to see what's written there, then it should be OK. Sometimes companies upload low resolution images. This is problematic as you cannot read what is written even when you enlarge the picture.	Requirements or recommendations on resolution of the promotional trademark elements used on website should be included.
8.12	T	A specific request has been collected, i.e. to re-size also the tick-and-tree logo, allowing <10 mm dimensions. The same Clause 8.12 implicitly suggests that the readability can be maintained, as a minimum size of 6 mm is allowed in some particular cases. Basically, the request consists in widening such a possibility (also proposed Clause 8.6 ) gives a minimum height of 8 mm for landscape format labels).	<10 mm dimensions should be allowed for the tick-and-tree logo, in line with the proposed comment.
8.12	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification. If 6mm is allowed, why make it difficult and also have 10mm for other situations. Have one size for all.	Modification: The minimum size of the tick-and-tree logo that is not part of an on product label should be calculated by the height of the logo and shall be 6 mm. Delete: (a) 10 mm, or (b) 6 mm, when used as an extra logo for paper size below A4, packaging below 1 litre, or to identify FSC-certified products as in 5.4.
8.12 b)	T	There is no 5.4 in the draft.	
8.12 b)	E	There is no 5.4	Use correct clause.
8.12 b)	G	Should be deleted	Label and licence code must always be readable.
8.12 b)	T	Reference to point 5.4 is made but the latter can't be found	Add clause 5.4
8.12 b)	G	6 mm, when used as an extra logo for paper size below A4, packaging below 1 litre, or to identify FSC-certified products as in 5.4. Clarity needed on if exactly A4 size and 1 litter size are included or not. And the size should be align with clause 8.4	6 mm, when used as an extra logo for paper size of A5 or smaller, packaging size of 250 ml or less, or to identify FSC-certified products as in 5.4.
8.12 b)	E	Typo: 6 mm, when used as an extra logo for paper size below A4, packaging below 1 litre, or to identify FSC-certified products as in 5.4.	6 mm, when used as an extra logo for paper size below A4, packaging below 1 litre, or to identify FSC-certified products as in 6.2.
8.13	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion: The minimum space is calculated by using the height of the FSC initials of the logo.

8.13	G,E,T	THIS ONE IS A MAJOR ISSUE FOR US: Please remove the exact requirement for clear space and enable Trained trademark approvers to assess if the label or panel is uncluttered. We are offending and upsetting certificate holders by insisting on this requirement even when the label is perfectly clear and visible. PELASE CONSIDER THIS POINT CAREFULLY and assess the merit of being specific over the intention of the clause.	Guidance could be given suggesting the minimum space is the same as the height of the initials FSC as used within the label or panel. Remember the stated Core Goals of the revision ' to make it easier to make public FSC Claims (and for approvers to be able to approve those claims sensibly). This goal is given on the front of the discussion document about the proposed on product label changes.
8.13	G	Clearance around the logo or label is clearly desirable, but not always possible. It is also not clear if such things as lines on invoices, or changes of background colour are infringements of the clear space. We sometimes find we have to ask for a label or promotional panel to be made smaller to allow for the required clearance which would seem to be counter-productive.	Either add 'where possible' or make it clear that it may be smaller in cases of restricted space.
8.13	T	I don't agree with the definition of "The minimum space is calculated by using the height of the FSC initials of the logo." Not practical, too much work to use and approval.	Shall be enough if the labels "not crowded".
8.13	G	Required free space should be reduced.	
8.13		Unnecessary and complex, the label must to be visible, but do not need to have mandatory exclusion zone.	Deletion
8.13	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Delete: The minimum space is calculated by using the height of the FSC initials of the logo.
8.13	T	drop the free space requirement. In many cases we need to have 2 mm or below which will not harm the credibility of FSC. Sufficient to say it should not interfere with the background.	Change wording
8.13	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Delete: The minimum space is calculated by using the height of the FSC initials of the logo.
8.13	G	There is an advice note about "fading background" – which allows variation to this requirement.	Double check status of advice note – sorry but I do not have its number.
8.13		This is the third most commonly cited reason the label isn't used in the US print industry. The fluctuating spacing requirement, while I understand its intent, drives graphic designers crazy.	There shall be enough clear space surrounding the label and logo to ensure that they remain uncluttered.
8.13	E	The clear space requirement is extremely prohibitive to CHs, especially in the print sector.	Only require clear space when other forestry scheme logos/names are included to clearly separate. Excuse clear space rule for all other uses.
8.13	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Delete: The minimum space is calculated by using the height of the FSC initials of the logo.
8.14	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
8.14	T	Is the Quick Guide to FSC Trademark Usage- Background guidance sheet sill applicable? Would a slight pattern or texture be acceptable?	Please clarify if the logos still cannot have a patterned background as per the Background guide. Would be good to include this guide in the main standard or at least reference it directly.

8.14	G	We support the proposed wording	
8.14	G	This sentence is not clear	Clarify in which cases the background is not clear... solid color is the only background allowed? In this case clarify...
8.14		unnecessary and complex	Delete and replace by the introduction suggested in 8 above
8.14	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
8.14	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
8.14	E	There is nothing in this standard that outlines the use of a faded exclusion zone as was shown in FAQs frequently	Add a note about faded exclusion zones, and perhaps visuals.
8.14	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Deletion
9. FFAF		Harmonization of rules for the labels and for the Forest For All Forever TM, especially in relation to colors and use of the TM protection symbol.	
9. FFAF		Harmonization of rules for the labels and for the Forest For All Forever TM, especially in relation to colors and use of the TM protection symbol.	
9.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use Forests For All Forever trademarks in following colour variations:
9.1	T	Why you don't have the trademark symbol on the examples?	Have the examples according to the rules that you are defining.
9.1		The colors should be preferred, but not compulsory	Change to preferred colors on Label Generator but not compulsory
9.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use Forests For All Forever trademarks in following colour variations:
9.1	T	drop color restrictions and align with requirements for the label use as both will face the issues that the desired colors are not available in the printing process. This requirement adds bureaucracy and will end in a reduced usage.	Evaluate necessity and change wording
9.1	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use Forests For All Forever trademarks in following colour variations:
9.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use these green colours for reproduction: (a) Dark green: Pantone 626C (R0 G92 B66) (b) Light green: Pantone 368C (R114 G191 B66)
9.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use these green colours for reproduction: (a) Dark green: Pantone 626C (R0 G92 B66) (b) Light green: Pantone 368C (R114 G191 B66)
9.2	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification. It should be recommended to use these colours and not prescribed.	Modification: It is recommended to use these green colours for reproduction: (a) Dark green: Pantone 626C (R0 G92 B66) (b) Light green: Pantone 368C (R114 G191 B66)
9.2	G	How about CMYK colour requirements? Clause 8.2 mentions CMYK colour requirements. So they should be made clear here too.	Include CMYK colour requirements.

9.2, 9.3		The colors should be preferred, but not compulsory because some materials do not have the preferred colors, e.g. printed material.	Change to preferred colors on Label Generator but not compulsory
9.2, 9.3	T	delete this as it will road block a larger on product use. Other colors will not harm the FSC credibility	Evaluate necessity and change wording
9.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
9.3	G	The logo Forest for All Forever should be produced using color different from those proposed by the standard, if the printed item does not use the standard colors.	
9.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
9.3	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
9.3	G	We understand that no other colours shall be used for the bi-coloured brandmark, but why is it not possible to use the e.g. darkest available colour of a printed product for the single coloured brandmarks?	Introduce possibility to use darkest available colours also for the brandmark to promote it on-product
9.4	T, E	This is not in the sense of simplification. If the minimum size of the Tick&Tree is 6 mm, this one should also be 6mm.	Modification: The minimum size for the Forests For All Forever marks when printed should be 6 mm in height.
9.4	T, E	This is not in the sense of simplification. If the minimum size of the Tick&Tree is 6 mm, this one should also be 6mm.	Modification: The minimum size for the Forests For All Forever marks when printed should be 6 mm in height.
9.4	T, E	This is not in the sense of simplification. If the minimum size of the Tick&Tree is 6 mm, this one should also be 6mm.	Modification: The minimum size for the Forests For All Forever marks when printed should be 6 mm in height.
9.4	G	Minimum size for Forest For All Forever mark shows by measuring the logo height at 10mm, but does not clarify size for logo with the green background.	Clarify size for logo when using the background.
9.5	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Delete: The minimum space is calculated by using the height of the FSC initials on the logo.
9.5	G,E,T	THIS ONE IS A MAJOR ISSUE FOR US: Please remove the exact requirement for clear space and enable Trained trademark approvers to assess if the label or panel is uncluttered. We are offending and upsetting certificate holders by insisting on this requirement even when the label is perfectly clear and visible. PELASE CONSIDER THIS POINT CAREFULLY and assess the merit of being specific over the intention of the clause.	Guidance could be given suggesting the minimum space is the same as the height of the initials FSC as used within the label or panel. Remember the stated Core Goals of the revision ' to make it easier to make public FSC Claims (and for approvers to be able to approve those claims sensibly). This goal is given on the front of the discussion document about the proposed on product label changes.
9.5	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Delete: The minimum space is calculated by using the height of the FSC initials on the logo.
9.5	T	delete requirement and align with FSC label use requirement	Change wording like for the FSC label placement
9.5	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Delete: The minimum space is calculated by using the height of the FSC initials on the logo.
9.5		See comments in 8.13	
9.5	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Delete: The minimum space is calculated by using the height of the FSC initials on the logo.
9.5, 9.6		Same promotional rules ,delete it	Deletion

9.6	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
9.6	G	You should have examples of the situations that you consider good uses and bad uses	E.g. Include the examples that FSC International gave on their training (document called "FSC-STD-50-001-V1-2-Background Sheet"
9.6	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
9.6	T, E	This is an unnecessary limitation to TM use and not in the sense of simplification.	Deletion
9.6	T, E	This is an unnecessary limitation to TM use and not in the spirit of simplification.	Deletion
9.7	G	It would maybe be better to say that only translations made by FSC international can be used, here is can be understood as English is the only acceptable language.	Please rewrite.
9.9	G	What is the approved translation? Who makes the translation and approve it? CH makes the translation and CB approves it? NO makes the translation and FSC IC approves it?	
Annex 1	G	This annex within the current standard changes at a more frequent rate compared to the standard itself. Currently certificate holders that follow the current annex within the standard are missing correct items due to the registration status of countries changing frequently.	Place a clear highlighted reference within this section of where to look for the correct up to date data and consider not housing any information within this section aside from a link/reference to the information.
Annex 2	E	The title of Annex 2 refers to Multisite in addition to others.The Annex itself does not cover the topic multi-site.	Modified: Annex 2: Additional trademark rules for group and project certificate holders.
Annex 2		1) Include multisite 1.3 confuse. Company can use promotional logo from another forest certification schemes. 2.3 e 2.4 the company shall be able to use the FSC label with the phrase, to stimulate their use and certified sales.	Include multisite change it  change it
Annex 2	E	The title of Annex 2 refers to Multisite in addition to others. The Annex itself does not cover the topic multi-site.	Modified: Annex 2: Additional tradem
Annex 2	E	Annex 2 refers to multisite but does not cover multisite	Modified: Annex 2: Additional trademark rules for group and project certificate holders
Annex 2	E	The title of Annex 2 refers to Multisite in addition to others. The Annex itself does not cover the topic multi-site.	Modified: Annex 2: Additional trademark rules for group and project certificate holders
Annex 2	E	Section 1 Special requirements should be consistent with the revised version of FSC-STD-40-003 v2-1 in terms of group or multi-site Chain of custody certification.	Change (b) to Chain of custody Certification of multiples sites Or Add: (c) FSC multi-site chain of custody certification (for designated central offices).
Annex 2	T	How about multi-site CoC certificate? Merging of multi-site and group certificate into one document (FSC-STD-40-003) does not mean there is no longer multi-site certificate. Please study FSC-STD 40-003 carefully. Multi-site CoC certificate and group CoC certificate are still two completely different certificate options. Multi-site certificate holders will think this annex is not applicable to them. However, requirements in annex 2 are still applicable to multi-site CoC certificate.	Include Multi-site CoC certificate throughout the annex 2.
Annex 2	E	The title of Annex 2 refers to Multisite in addition to others. The Annex itself does not cover the topic multi-site.	Modified: Annex 2: Additional trademark rules for group and project certificate holders
Annex 2, 1. special requirements	E	There is no mention of multisites here only FM and COC Groups.	

Annex 2, 1.1	T	Reference to Group members shall submit all approvals via the group entity or central office and keep records of their 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.	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.)
Annex 2, 1.1		Will group managers that get 'self approver' status be able to approve member usages?	
Annex 2, 1.1 d)	T	We don't believe promotional use should be given under the self approval scheme as the variety of uses is too great.	
Annex 2, 1.2	E	'Similar' is too vague a word	Be specific about what is not allowed on a Group Member document.
Annex 2, 1.2	G	Define what you mean with "The group entity shall not produce any document similar to an FSC certificate for its participants." – "Similar" is a very vague word	E.g specify what you don't want to see/ be said in the document.
Annex 2, 1.2	G	It should be easier for smallholder groups to communicate that they are FSC-certified and that their members to receive certificates or other documents that the group is certified and that the member is part of it. In such a document an FSC-logo used will raise proudness and visibility. It is important in FSCs Global Strategy to increase the number of smallholders and this is a way to boost their pride of being part of FSC. The risk for misuse is small, and if still happening the scale is minimal.	Please rewrite.
Annex 2, 1.3	G	Are you asking Groups to have separate sets of procedures for different forest certification schemes?	Deletion
Annex 2, 1.3	E	The responsibility must be transferrable for instance if the contact leaves the organisation, is ill or on holiday.	
Annex 2, 1.3	G	Most of FSC-certified smallholders in Sweden are both certified according to FSC and PEFC, almost all other Swedish smallholders are only PEFC-certified. With this requirement the possibility to recruit these smallholders for FSC-certification becomes much more difficult as there will be many joint documents for both systems. Should a double certified group have double instructions, documentation and information to staff or group members?	Deletion
Annex 2, 1.3		I don't understand the purpose of this clause. How restrictive is it intended to be? What is the definition of "in connection with FSC certification"? Why does it even matter? Some groups carry certifications other than FSC. Are you trying to stop them from advertising for any programs other than FSC? Good luck on that. This clause is too ambiguous, without specific definitions of what a "connection" entails. Even after "connection" is detailed, it's probably unnecessary and will just serve to inflame some of FSC's strongest economic chamber supporters by trying to restrict them in odd ways.	Remove this clause
Annex 2, 1.5	E	How will this clause be measured and by who?	
Annex 2, 2.5		"The year that the certificate is issued shall always be included" – should be added to 2.7 requirement to include Certificate Number and Date.	Ammend
Annex 2, title	E	There is a reference to "multi-site" and the procedures only apply to CoC group certificates, Forest Management certificates, and Project certification. This title should reflect what the standards are based on.	Remove multi –site wording

Annex 3	G	FSC must ensure control measures for the use of self approval for promotional uses to guarantee correct allegations. The company need to present all the possible phrases to previous approval. Provide examples of the system guarantee	Change it
Annex 3	G	Insert an introduction to clarify the self approval, whom can use it, difference between on product and promotional use, and promotional use includes seals and text.	Introduction clarifying the self approval.
Annex 3		Clarify whether self approval is available only for preferred colours (from label generator) or could be in different colors. We recommend no restriction regarding self approval and types of colors.	Include this
Annex 3	G	It should be FSC (or FSC trademark officer) that runs self-approver system and grant the self-approver status. CBs can check the correct use and appropriate implementation during each surveillance, but CBs are not to be held responsible for granting self-approver status.	self-approver system is controlled by FSC and/or FSC trademark officer of the country. CB should only check the correct implementation of the system.
Annex 3	G	Everything (applying/granting self-approver status or applying for trademark use) should be done on-line for simplified paperwork. Complicated and lengthy process for trademark approval has kept a lot of CHs away from promoting FSC trademark use.	On-line system for applying/granting self-approver status or applying for trademark use shall be introduced by FSC.
Annex 3	G	This Annex does not reflect the core intention of motion 29. Current TM approvals and self-approvals shall be replaced by evaluation on sample basis during FSC audits, by trained CB auditors.	Deletion
Annex 3	G	FSC should provide some guidance for CBs to audit the self-approval process, to ensure assigned people are still meeting all requirements.	Request FSC makes a guidance or procedure doc for CBs for this.
Annex 3	T, G	The discussion on this issue has been highly participated. Though the vast majority approved this proposed change, interesting feedbacks and suggestions have been also provided.	<p>- Mainly Certification Bodies observed that a wide set of complementary/further information should be added, specified and/or clarified. Among the others:</p> <ul style="list-style-type: none"> <li>o Timeline: maximum term by which 3 correct requests shall be submitted to CBs. In fact, it has been stressed that it is intuitive that 3 correct requests submitted in a time-span, just for example, of 2 years do not equal the same number of requests submitted in a couple of months.</li> <li>o Non conformities: consequences for non-conformities detected during the annual audit should be specified. Furthermore, it should be noted and considered that, hopefully, non-conformities would be detected during the D26annual audits, but several products wrongly labelled could have already entered the market, with no chances to solve this issue at that point.</li> </ul> <p>So, it has been suggested that it could be better to introduce self-approval (many CHs in favour of this option), but at least maintaining the obligation by CHs to forward the intended uses to CBs too, for remote checking, with no need of formal approval by CBs before the actual use.</p> <ul style="list-style-type: none"> <li>o Repetitiveness: the number of 3 correct submissions seems fair if high repetitiveness in the artwork, e.g. same background, same product type, same label category (with similar productive processes and related labelling thresholds). On the other</li> </ul>

			<p>hand, in some other circumstances (opposite situations, and see also the comment “timeline” above) they might be few, and/or not enough to verify the overall competence and awareness in the trademark use.</p> <ul style="list-style-type: none"> <li>- Some further information should be given about the training program of FSC Global Development, in order to evaluate this proposal. Furthermore, it has been stressed that FSC Network Partners (e.g. National Offices), CBs (others than that specifically auditing each CH) and other subjects D40 should be allowed to provide training on trademark use as well, i.e. not only FSC Global Development. An evaluation of the training methods and competences of each “Trading Provider” (terminology in line with the current draft of FSC-PRO-01-004) could be considered. Such evaluation could be performed by FSC IC (not by ASI, as suggested in the abovementioned procedure, as this would imply high fees for Training Providers!). This comment/suggestion/request originate from the D45 experience and awareness (gained by NO FSC Italy as well) that face-to-face training courses have proved to be more effective, and even preferred by several stakeholders, than those made through on-line and/or “remote” tools. One method should not exclude another one, letting stakeholders (both CHs and Training Providers) to choose their own preferred option.</li> <li>- It's not clear why self-approval could be automatically renewed if a new person is appointed as responsible for the trademark use (subjected to D51 the training program). In fact, given that the responsibility is personal and cannot be transferred, the new appointed person might not have any experience (except the theoretical background) on the trademark use. Thus, the opportunity of submitting again a set of correct submissions should be considered, before the confirmation of the valid self-approval status is given.</li> <li>- CBs observed that it's not clear how many “degrees of freedom” CHs should be granted. In fact, possible uses are almost innumerable, particularly for the promotional use. To this point, misuses are particularly likely to occur, also covering issues listed in Clause 2.1, letters a)-e). CBs agreed that it would be better to exclude the promotional use from the self-approval scope. No CHs nor consultants objected to such a comment.</li> </ul>
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			<ul style="list-style-type: none"> <li>- One single CH observed that self-approval may be extended even to organisations that do not comply with self-approval requisites, if other specific circumstances occur, i.e. for “basic” and specific labelling features/conditions, e.g. for a “standard” label to be applied on printed material with white background. Every change in such one (or more) specific and “basic” case(s) would still need the pre-emptive approval by CB, a valid self-approval status. Indeed, it should be noted that Clause 5.3 provides a similar possibility with reference to the promotional panel.</li> <li>- It should be given some further clarifications on the link (scope, applicability, etc.) the self-approval requirements and possible labelling agreements among different certified CHs.</li> <li>- Wording such as “outstanding” (Clause 1.2, Annex 3) should be aligned with “major” or “minor”. Otherwise, better clarification should be given.</li> <li>- CBs strongly and unanimously suggested/requested to simplify the “accreditation program” to obtain (CHs) and issue (CBs) a valid self-approval status. Certification Bodies suggested that one single training program should be provided/followed, in order to issue/gain one single self-approval status, valid for all the possible scopes (FSC categories + promotional use). This, in order to avoid different CHs having different self-approval scopes, that is a condition that would be really hard to manage by CBs, and possibly confusing even for CHs. In other words, a valid self-approval status should be issued “as a whole”, for all the possible scopes. This comment should be considered jointly with the previous ones.<sup>19</sup></li> </ul>
Annex 3	G	This Annex does not reflect the core intention of motion 29. Current TM approvals and self-approvals shall be replaced by evaluation on sample basis during FSC audits, by trained CB auditors.	Deletion
Annex 3		The versions of the label seem to be not easier. E. g. the end user will not understand/know the difference between “Supporting responsible forestry” and “from certified and controlled material”. First of all they will see the FSC-label and maybe a small number of end user will have a look at the text in addition.	
Annex 3		As we also noted to the CoC-consultation, would it not be better to combine the credit-system and the percentage-system? So it would be possible to produce more products with the FSC-label and the material balances could be easier. Anyway the end user of the products don’t see and know the difference.	
Annex 3		If the labels should be changing, would cause big costs and efforts to the producers. So it would be necessary that changes should be made when needing new plates. But that means, that some products need several years.	
Annex 3		We need more information about the self-approval system. Is this great effort really necessary	

Annex 3	G	Will lead to administrative efforts and possible misuse	Deletion
Annex 3	G	Allowing self approval for organizations is the right thing to do and will allow companies to take ownership over their own trademark use.	Leave self approval within the trademark standard and allow for certificate holders to highlight their system for doing the right thing.
Annex 3	G	Remove	Deletion
Annex 3	T,G	The discussion on this issue has been highly participated. Though the vast majority approved this proposed change, interesting feedbacks and suggestions have been also provided.	<p>- Mainly Certification Bodies observed that a wide set of complementary/further information should be added, specified and/or clarified. Among the others::</p> <ul style="list-style-type: none"> <li>o Timeline: maximum term by which 3 correct requests shall be submitted to CBs. In fact, it has been stressed that it is intuitive that 3 correct requests submitted in a time-span, just for example, of 2 years do not equal the same number of requests submitted in a couple of months.</li> <li>o Non conformities: consequences for non-conformities detected during the annual audit should be specified. Furthermore, it should be noted and considered that, hopefully, non-conformities would be detected during the annual audits, but several products wrongly labelled could have already entered the market, with no chances to solve this issue at that point. So, it has been suggested that it could be better to introduce self-approval (many CHs in favour of this option), but at least maintaining the obligation by CHs to forward the intended uses to CBs too, for remote checking, with no need of formal approval by CBs before the actual use.</li> <li>o Repetitiveness: the number of 3 correct submissions seems fair if high repetitiveness in the artwork, e.g. same background, same product type, same label category (with similar productive processes and related labelling thresholds). On the other hand, in some other circumstances (opposite situations, and see also the comment "timeline" above) they might be few, and/or not enough to verify the overall competence and awareness in the trademark use.</li> </ul> <p>- Some further information should be given about the training program of FSC Global Development, in order to evaluate this proposal.</p> <p>Furthermore, it has been stressed that FSC Network Partners (e.g. National Offices), CBs (others than that specifically auditing each CH) and other subjects should be allowed to provide training on trademark use as well, i.e. not only FSC Global Development. An evaluation of the training methods and competences of each "Trading Provider" (terminology in line with the current draft of FSC-PRO-01-004) could be considered. Such evaluation could be performed by</p>

			<p>FSC IC (not by ASI, as suggested in the abovementioned procedure, as this would imply high fees for Training Providers!). This comment/suggestion/request originate from the experience and awareness (gained by NO FSC Italy as well) that face-to-face training courses have proved to be more effective, and even preferred by several stakeholders, than those made through on-line and/or "remote" tools. One method should not exclude another one, letting stakeholders (both CHs and Training Providers) to choose their own preferred option.</p> <ul style="list-style-type: none"> <li>- It's not clear why self-approval could be automatically renewed if a new person is appointed as responsible for the trademark use (subjected to the training program). In fact, given that the responsibility is personal and cannot be transferred, the new appointed person might not have any experience (except the theoretical background) on the trademark use. Thus, the opportunity of submitting again a set of correct submissions should be considered, before the confirmation of the valid self-approval status is given.</li> <li>- CBs observed that it's not clear how many "degrees of freedom" CHs should be granted. In fact, possible uses are almost innumerable, particularly for the promotional use. To this point, misuses are particularly likely to occur, also covering issues listed in Clause 2.1, letters a)-e). CBs agreed that it would be better to exclude the promotional use from the self-approval scope. No CHs nor consultants objected to such a comment.</li> <li>- One single CH observed that self-approval may be extended even to organisations that do not comply with self-approval requisites, if other specific circumstances occur, i.e. for "basic" and specific labelling features/conditions, e.g. for a "standard" label to be applied on printed material with white background. Every change in such one (or more) specific and "basic" case(s) would still need the pre-emptive approval by CB, a valid self-approval status. Indeed, it should be noted that Clause 5.3 provides a similar possibility with reference to the promotional panel.</li> <li>- It should be given some further clarifications on the link (scope, applicability, etc.) the self-approval requirements and possible labelling agreements among different certified CHs.</li> <li>- Wording such as "outstanding" (Clause 1.2, Annex 3) should be aligned with "major" or "minor". Otherwise, better clarification should be given.</li> </ul>
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			<p>- CBs strongly and unanimously suggested/requested to simplify the “accreditation program” to obtain (CHs) and issue (CBs) a valid self-approval status. Certification Bodies suggested that one single training program should be provided/followed, in order to issue/gain one single self-approval status, valid for all the possible scopes (FSC categories + promotional use). This, in order to avoid different CHs having different self-approval scopes, that is a condition that would be really hard to manage by CBs, and possibly confusing even for CHs. In other words, a valid self-approval status should be issued “as a whole”, for all the possible scopes. This comment should be considered jointly with the previous ones.</p>
Annex 3	T	Integrate results from the FSC feasibility study on the trademark approval process as the input is seen as essential for this revision	
Annex 3	T	Self approval is used by us since long. The best thing is to follow the FSC standard logic of the FM and COC by integrating the correct utilization of FSC trademark during the annual audit only	
Annex 3	G	This Annex does not reflect the core intention of motion 29. Current TM approvals and self-approvals shall be replaced by evaluation on sample basis during FSC audits, by trained CB auditors.	Deletion
Annex 3	G	This is a great improvement!	Please add a text in the beginning, which explains what self-approval means.
Annex 3		The self-approval system should be omitted, if in principle the option is chosen that no approvals are necessary. Also the self-approval system is needless if the requirements would be more simple. We request to know more about the results on the self-approval pilot.	
Annex 3		A potential self-approval system should be designed differently: The CH develops a guide and templates for TM use that is approved by the certifier and the actual use of the TM is based on this guide and template under a self-approval mode – this without complicated requirements.	
Annex 3	T, G	The discussion on this issue has been highly participated. Though the vast majority approved this proposed change, interesting feedbacks and suggestions have been also provided.	<p>- Mainly Certification Bodies observed that a wide set of complementary/further information should be added, specified and/or clarified. Among the others::</p> <ul style="list-style-type: none"> <li>o Timeline: maximum term by which 3 correct requests shall be submitted to CBs. In fact, it has been stressed that it is intuitive that 3 correct requests submitted in a time-span, just for example, of 2 years do not equal the same number of requests submitted in a couple of months.</li> <li>o Non conformities: consequences for non-conformities detected during the annual audit should be specified. Furthermore, it should be noted and considered that, hopefully, non-conformities would be detected during the annual audits, but several products wrongly labelled could have already entered the market, with no chances to solve this issue at that point. So, it has been</li> </ul>

			<p>suggested that it could be better to introduce self-approval (many CHs in favour of this option), but at least maintaining the obligation by CHs to forward the intended uses to CBs too, for remote checking, with no need of formal approval by CBs before the actual use.</p> <ul style="list-style-type: none"> <li>o Repetitiveness: the number of 3 correct submissions seems fair if high repetitiveness in the artwork, e.g. same background, same product type, same label category (with similar productive processes and related labelling thresholds). On the other hand, in some other circumstances (opposite situations, and see also the comment "timeline" above) they might be few, and/or not enough to verify the overall competence and awareness in the trademark use.</li> <li>- Some further information should be given about the training program of FSC Global Development, in order to evaluate this proposal.</li> </ul> <p>Furthermore, it has been stressed that FSC Network Partners (e.g. National Offices), CBs (others than that specifically auditing each CH) and other subjects should be allowed to provide training on trademark use as well, i.e. not only FSC Global Development. An evaluation of the training methods and competences of each "Trading Provider" (terminology in line with the current draft of FSC-PRO-01-004) could be considered. Such evaluation could be performed by FSC IC (not by ASI, as suggested in the abovementioned procedure, as this would imply high fees for Training Providers!). This comment/suggestion/request originate from the experience and awareness (gained by NO FSC Italy as well) that face-to-face training courses have proved to be more effective, and even preferred by several stakeholders, than those made through on-line and/or "remote" tools. One method should not exclude another one, letting stakeholders (both CHs and Training Providers) to choose their own preferred option.</p> <ul style="list-style-type: none"> <li>- It's not clear why self-approval could be automatically renewed if a new person is appointed as responsible for the trademark use (subjected to the training program). In fact, given that the responsibility is personal and cannot be transferred, the new appointed person might not have any experience (except the theoretical background) on the trademark use. Thus, the opportunity of submitting again a set of correct submissions should be considered, before the confirmation of the valid self-approval status is given.</li> <li>- CBs observed that it's not clear</li> </ul>
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			<p>how many “degrees of freedom” CHs should be granted. In fact, possible uses are almost innumerable, particularly for the promotional use. To this point, misuses are particularly likely to occur, also covering issues listed in Clause 2.1, letters a)-e). CBs agreed that it would be better to exclude the promotional use from the self-approval scope. No CHs nor consultants objected to such a comment.</p> <ul style="list-style-type: none"> <li>- One single CH observed that self-approval may be extended even to organisations that do not comply with self-approval requisites, if other specific circumstances occur, i.e. for “basic” and specific labelling features/conditions, e.g. for a “standard” label to be applied on printed material with white background. Every change in such one (or more) specific and “basic” case(s) would still need the pre-emptive approval by CB, a valid self-approval status. Indeed, it should be noted that Clause 5.3 provides a similar possibility with reference to the promotional panel.</li> <li>- It should be given some further clarifications on the link (scope, applicability, etc.) the self-approval requirements and possible labelling agreements among different certified CHs.</li> <li>- Wording such as “outstanding” (Clause 1.2, Annex 3) should be aligned with “major” or “minor”. Otherwise, better clarification should be given.</li> <li>- CBs strongly and unanimously suggested/requested to simplify the “accreditation program” to obtain (CHs) and issue (CBs) a valid self-approval status. Certification Bodies suggested that one single training program should be provided/followed, in order to issue/gain one single self-approval status, valid for all the possible scopes (FSC categories + promotional use). This, in order to avoid different CHs having different self-approval scopes, that is a condition that would be really hard to manage by CBs, and possibly confusing even for CHs. In other words, a valid self-approval status should be issued “as a whole”, for all the possible scopes. This comment should be considered jointly with the previous ones</li> </ul>
Annex 3	T	<p>While this option is a nice thought, it really depends on the CB and what level of detail they apply to approvals. I am a very experienced consultant, and trademark approvals are scrutinized to different level of detail by different CBs. When working with Rainforest Alliance, it is very difficult to receive approval without changes being requested. On the flip side, those CBs that don’t pay as much attention to detail and grant self-approval status, those organisations are going to be exposed to potential non-conformances.</p>	<p>The trademark approval process is quite efficient and there is no need for a change. If you want to streamline, consider removing trademark approval process for “FSC” and “Forest Stewardship Council” and just require it for use of the logos.</p>

Annex 3	G	This Annex does not reflect the core intention of motion 29. Current TM approvals and self-approvals shall be replaced by evaluation on sample basis during FSC audits, by trained CB auditors.	Deletion
Annex 3		The self-approval system should be omitted, if in principle the option is chosen that no approvals are necessary. Also the self-approval system is needless if the requirements would be more simple. We request to know more about the results on the self-approval pilot.	
Annex 3		A potential self-approval system should be designed differently: The CH develops a guide and templates for TM use that is approved by the certifier and the actual use of the TM is based on this guide and template under a self-approval mode – this without complicated requirements.	
Annex 3, 1.1	T	Suggest to add MINI label as a separate category. This ensures the correct size requirements are being approved.	
Annex 3, 1.1	G	Three consecutive correct approval requests is not much.	Five or 10 consecutive correct approval requests
Annex 3, 1.1	G	It is not clear if 3 consecutive approval is necessary for each of the a) to d) or not. Can it be one FSC 100% approval followed by two promotional use approvals? It should also be made clear if approval after a correction request by CB can be treated as correct approval or not.	Clearer wording needed.
Annex 3, 1.1 d)	G	RA strongly urges d) to be revised to “Promotional Panel” rather than “promotional use.” Promotional trademark use requires the most revision requests by trademark agents. Simple use of the promotional panel is acceptable to be included in the self-approval. However, promotional text is complicated and should remain with the TSP to review and approve. RA recommends FSC provide general promotional statements that can be included as part of the self-approval.	
Annex 3, 1.1 d)		Self approval to promotional use only to phrases previously approved and label.	Change it
Annex 3, 1.2	T	RA understands the requirement to ensure there are no outstanding corrective actions from the trademark standard, however, focus should be on recurring or MAJOR NCRs to review root cause of trademark use. Additionally, exceptions should be granted for requirements that are not covered in the scope of self-approval.	“The organization has no outstanding MAJOR corrective action requests, and no recurring nonconformities within the certification cycle, related to the scope of the self-approval.”
Annex 3, 1.2, 3.2	G	It should be made clear that when a minor CAR is raised during a surveillance regarding trademark use, then the CH will be suspended of their self-approver status until the CAR is addressed.	
Annex 3, 1.3.1	E	Typo of office	For groups and multisites, the responsible person will be an assigned person of the central officer and it is at their discretion whether additional persons from member organizations may apply for the self-approval status.
Annex 3, 1.3.1	G	For multi site organisations: OK, as there is in general a higher degree of control by central office. For group certification: assigning self-approval status to individual members constitutes a higher risk for different opinions in between group members, as well as much higher control effort by CB.	Restrict this option only to multi site CH
Annex 3, 1.3.1		I think this clause is answering my question regarding Annex 2, 1.1, but I'm not entirely sure. This clause should be moved to Annex 2 for continuity. Or perhaps a clause should be added into Annex 2 that clarifies that someone from the central office must bear primary responsibility as outlined in Annex 3. Somehow this, and Annex 2, should be more clearly connected.	Move to Annex 2
Annex 3, 1.4	G	Such training program should be free of charge, online and in multi languages available.	

Annex 3, 1.4		Such training program should be free of charge, online and in multi languages available. The training program should give an evidence of who made the training.	Ensure the system has this conditions
Annex 3, 1.4	G	Such training program should be free of charge, online and in multi languages available.	
Annex 3, 1.4	T	What is the FSC Global Development's training programme on FSC trademark use ?	clarify
Annex 3, 1.4	G	Such training program should be free of charge, online and in multi languages available.	
Annex 3, 1.4	G	Training should be made available 'online' to ensure ease of approval.	
Annex 3, 1.4	G	Such training program should be free of charge, online and in multi languages available.	
Annex 3, 1.6	G	The self-approval status is a good addition to FSC trademark use standard.	Keep the requirements of self-approval status.
Annex 3, 2.1, 2.2	G	The content is good but the language and some of the detailed should be streamlined with rest of the document. Examples are "aforementioned" and "corresponding eligibility"	Please simplify.
Annex 3, 2.2		Poor use of English – unclear what is meant – what is the eligibility record?	Revise
Annex 3, 2.2		The use of the word "all" leads me to understand you are prohibiting auditor sampling of self approver work? So if a self approver does 1000 jobs in a year, the CB auditor will need to review all 1000 jobs? That's an awful lot of extra work. I'm pretty sure this clause is the antithesis of Motion 29.	
Annex 3, 2.3		A proportion of trademarks e.g. Square root should be sent for approval to CB – otherwise open ended commitment	Revise
Annex 3, 3.1	T	Suspension should only be lifted after a new person has been assigned, trained, and approved by the CB. This ensures that the self-approval is only active when a CB has approved a person.	"... has been assigned, trained, and approved by the certifying body."
Annex 3, 3.1		When the self approval is suspended, the company must send 3 consecutive correct uses for approval to validate the new self approval.	Include this
Annex 3, 3.1	G	How are CBs supposed to suspend (or terminate) the status if the status is renewed without any requests submitted by the CHs? That is impractical. Rather, it is more practical to require CHs to do so internally and have CBs check such implementation at annual audits.	The organization shall appoint and train a new person upon a change of the named person in charge of FSC trademark use in the organization. If such appointment and training within three months is not confirmed by the CB, the status for self-approval shall be terminated.
Annex 3, 3.2	T, E	This course of action does not in any sense invite nor encourage CHs to use the TM. Decisions on whether self-approval status is issued or withdrawn should be with the approval body.	Deletion
Annex 4	E	??? does logo mean trademark ? please define what is label, logo trademark etc.	redraft
Annex 4	G		Add definitions of FSC label, FSC logo and FSC trademarks
Annex 3, 3.2	T	The requirement should be revised to only address MAJOR corrective actions that are related to the self-approval.	"Any major correction action requests related to scope of the self-approval, raised in an audit or during the audit period..."

Annex 3, 3.2	G	<p>Among 2 options proposed for new label, (B) One label model is preferred for simplification.</p> <p>It is good that CHs have options for easier-to understand label model.</p> <p>However, it is extremely important that current label designs that have already been in use by CHs must be allowed without changes.</p> <p>Long-time CHs still remember and complain about the previous trademark standard revision in 2011, when 50-001 was introduced and they had to change all the logo design that they had been using. We as CB received so many complaints that such logo design change cost so much.</p> <p>If FSC introduced new trademark design to replace the current ones now, CHs would have to change all of their material again, only within several years after the previous revision. They would be very unhappy, and we are afraid some of them would withdraw from FSC system unless they were allowed to continue using the current designs along with the new designs.</p>	(B) One label model should be applied, along with the current designs as optional use.
Annex 3, 3.2	T, E	This course of action does not in any sense invite nor encourage CHs to use the TM. Decisions on whether self-approval status is issued or withdrawn should be with the approval body.	Deletion
Annex 3, 3.2	T, E	This course of action does not in any sense invite nor encourage CHs to use the TM. Decisions on whether self-approval status is issued or withdrawn should be with the approval body.	Deletion
Annex 3, 3.2		Needlessly complicated to regulate – if they get a major – self approval is suspended until the next audit and 3 consecutive requests submitted	Revise
Annex 3, 3.2	T, E	This course of action does not in any sense invite nor encourage CHs to use the TM. Decisions on whether self-approval status is issued or withdrawn should be with the approval body.	Deletion

**Table B. Comments received for the discussion paper FSC-DIS-50-003 – FSC on-product labels**

Reference Part No. / Clause. No. / Note/Annex/Definitio n (e.g. "Introduction"; clause 3.1; p. 8, line 3)	Type of comment  G = general; T = technical; E = editorial	Comment  Justification / rationale for change
1. Background	G	The current labels are not understandable to the consumer and do need simplifying – agreed! To justify the change (resource implications for business), there must be a significant improvement.
1. Background	G	In the draft it is said that "FSC members have raised a concern that the current Mix label does not truthfully represent the materials and processes behind the label". We have different opinion. The MIX label is quite well known and understood by our customers.
1. Background	G	In the draft it is said that "FSC members have raised a concern that the current Mix label does not truthfully represent the materials and processes behind the label". Metsä Group and its member companies as FSC members have different opinion. The MIX label is quite well known and understood by our customers.
1. Background	G	In the draft it is said that "FSC members have raised a concern that the current Mix label does not truthfully represent the materials and processes behind the label". SE WSF and its member companies as FSC members have different opinion. The MIX label is quite well known and understood by our customers.
1. Background	G	In the draft it is said that "FSC members have raised a concern that the current Mix label does not truthfully represent the materials and processes behind the label". SE WSF and its member companies as FSC members have different opinion. The MIX label is quite well known and understood by our customers.
1. Background	G	In the draft it is said that "FSC members have raised a concern that the current Mix label does not truthfully represent the materials and processes behind the label". FFIF and its member companies as FSC members have different opinion. The MIX label is quite well known and understood by our customers.
1. Background	G	<p>This entire discussion seems to be a microcosm of the identity crisis that FSC has been having for well over a decade. That crisis is simple – does FSC want to be either:</p> <ol style="list-style-type: none"> <li>1. a label for the masses (ex. UL listed) that almost everyone can get, which acts as the baseline that any decent forest product should attain?</li> <li>2. an exclusive label (ex. CR Best Buy) showing the best of the best, something which is hard to obtain and only few companies carry?</li> </ol> <p>In other words, is FSC a Chevrolet or a Cadillac? A Mini Cooper or a BMW?</p> <p>I personally don't think the environmental chamber is bothered by the specifics of the FSC label. I think they're bothered by the Controlled Wood standard. The CW standard is porridge and the environmental chamber ordered steak. Twenty years ago, FSC said the steak would be here shortly, but there's still porridge on the table today. Cold porridge even, because it's been 20 years! I'd be pissed too. But, because FSC has never managed to clearly define their (I realize "our" – I am a part of FSC after all) desired role in the world, there continues to be no resolution to the CW question. Just a lot of fence sitting, trying to make everyone happy, with the end result being no one is happy. With no resolution to the CW question, everyone is left trying to jury-rig everything around it, including, apparently, this trademark standard. If CW is here to stay, then it needs to be fully integrated. No label 'disclaimer' needed. If it's not, then put a sunset clause on 40-005 and be done. Stop monkeying around with everything else.</p> <p>CHs who actually use the label want four things – simpler rules surrounding color, size, clear space, and placement. Anything that doesn't positively impact those four issues is either extraneous or detrimental.</p> <p>The fifth issue is the approval process. And quite frankly, that's a problem with CBs. Rainforest Alliance and SCS Global have great approval systems. They are fast, straightforward, and simple. The other CB systems (I'm personally familiar with about half a dozen) range from "not great" to "embarrassing". But that's not a problem of the trademark standard. That's a failure of CBs to invest in their infrastructure. If I was RA or SCS, I'd be pissed that other CBs are getting let off the hook after they took the time to already invest!</p> <p>In short, a great number of the suggested changes seem to be a straw man for other problems. The actual issues that exist are only being moderately addressed. This draft, by trying to do a little bit for everyone, ends up failing completely at answering either of the two motions driving it. Much more work is needed.</p>
2. Current Situation	G	FSC should keep the current FSC Mix label and not pursue further changes. The proposed options do not provide additional clarity that would be easily understood by the general consumer (e.g., controlled sources vs responsible sources). The implementation of a new FSC Mix label results in additional burden to certificate holders and brands that use the existing FSC Mix label. FSC should realize that even the smallest change to an existing logo or labelling requirement can result in significant burden for certificate holders to implement across many facilities and operating divisions.
2. Current Situation	G	This is a well-accepted and understood representation of claims both by certified companies who apply them and within the marketplace. I do not see any benefit to changing this well-accepted and

		respected structure. While I do like the text being voluntary, I also believe that many printers will continue to use Mix and Recycled because it will continue to be important to many of their clients to showcase to their end users. With Mix and Recycled included in the printed Trademark, printers' clients can compare the printed piece to the claim on a packing slip or invoice if they wish. No changes required to present standard. The only exception could be to add the option from Section A, One label model stating "the text is voluntary and the label may be used without it.
2. Current Situation	E	In line with the proposed change in the trademark above mention that the moebius loop can contain separate information on post-consumer content in the sentence "The Moebius loop may be used as an optional element for Recycled and Mix labels."
3. Proposed options	G	I don't agree with the use of one label due to the fact that it is too general for people who are well-informed. Also I don't see the benefit in changing the current mix label in the three label scenario, as this will cause a significant amount of work (and therefore cost) for very little gain, if any, as the proposed wording is so similar.
3. Proposed options	G, T	no support either option A or B. As said above the existing label models are well known and the changes would only result in confusion. In addition, the changes would cause extra costs to companies, even though FSC has emphasized user-friendliness and cost-efficiency etc. (FSC Global Strategy). In case of the option B (one label model) the visibility of the recycled grades would be lost. To show that is essential at least among many customers of pulp and paper companies. existing logos/labels (FSC 100 %, FSC Mix and FSC Recycled) should be kept also in the future.
3. Proposed options	G/T	Metsä Group does not support either option A or B. As said above the existing label models are well known and the changes would only result in confusion. In addition, the changes would cause extra costs to companies, even though FSC has emphasized user-friendliness and cost-efficiency etc. (FSC Global Strategy). In case of the option B (one label model) the visibility of the recycled grades would be lost. To show that is essential at least among many customers of pulp and paper companies. Metsä Group emphasizes the importance of continuity. This means that existing logos/labels (FSC 100 %, FSC Mix and FSC Recycled) should be kept also in the future.
3. Proposed options	G, T	SE WSF does not support either option A or B. As said above the existing label models are well known and the changes would only result in confusion. In addition, the changes would cause extra costs to companies, even though FSC has emphasized user-friendliness and cost-efficiency etc. (FSC Global Strategy). In case of the option B (one label model) the visibility of the recycled grades would be lost. To show that is essential at least among many customers of pulp and paper companies. SE WSF emphasizes the importance of continuity. This means that existing logos/labels (FSC 100 %, FSC Mix and FSC Recycled) should be kept also in the future.
3. Proposed options	G, T	SE WSF does not support either option A or B. As said above the existing label models are well known and the changes would only result in confusion. In addition, the changes would cause extra costs to companies, even though FSC has emphasized user-friendliness and cost-efficiency etc. (FSC Global Strategy). In case of the option B (one label model) the visibility of the recycled grades would be lost. To show that is essential at least among many customers of pulp and paper companies. SE WSF emphasizes the importance of continuity. This means that existing logos/labels (FSC 100 %, FSC Mix and FSC Recycled) should be kept also in the future.
3. Proposed options	G	We would like to see a simplification of the on-product label and therefor reduce the number of elements in the label to only include the checkmark-tree, the name FSC and the certificate code. A description of the product type could be added in conjunction to the label when there is a need to clarify which parts of the products are certified. For a book its obvious but for packing used that's not always the case. Other eco- and social labels do not have this level of detail, a clear simple message to the consumer has a greater impact than a high level of detailed information that either confuses or gives them enough information.
3. Proposed options	G	Is there a risk that demand for FSC certified material will be reduced should there be no differential between Mix and 100%? What incentive would there be for a company to retain the 100% claim if they are labelling with one label?
3. Proposed options	G	Would it be an option to retain the text for the 100% and Recycled full label but simply delete the current text from the Mix label?
3. Proposed options	G	If the single label option was implemented, would it be worth considering allowing the 100% and Recycled versions to certificate holders that wished to differentiate between the claims? Or, similarly, have the one version of the mini-label but retain the option to use the full labels for 100% and Recycled?
3. Proposed options	G	Presumably there would still be a separate label (and text) for the Small and Community Label?"
Model A	G	Among 2 options proposed for new label, (B) One label model is preferred for simplification. It is good that CHs have options for easier-to understand label model. However, it is extremely important that current label designs that have already been in use by CHs must be allowed without changes. Long-time CHs still remember and complain about the previous trademark standard revision in 2011, when 50-001 was introduced and they had to change all the logo design that they had been using. We as CB received so many complaints that such logo design change cost so much. If FSC introduced new trademark design to replace the current ones now, CHs would have to change all of their material again, only within several years after the previous revision. They would be very unhappy, and we are afraid some of them would withdraw from FSC system unless they were allowed to continue using the current designs along with the new designs.
Model A	G	Should the FSC Mix label change, RA requests that either A3 is used, or A1 with the URL. RA strongly urges FSC to avoid using A2, as "controlled material" is not a familiar term to consumers, and raises questions regarding FSC that cannot easily be answered in a label.

Model A	E	Please clarify this statement: "According to the draft standard I public consultation, the text is voluntary and the label may be used without it." Does this refer 3.4 where the mini logo can be used without exception? Or will there be a full style logo without the text?
Model A	G	Of the three proposed Mix label options, A.1 is the best. However, this change shouldn't be made unless it seems it will make a significant impact in the clarity of the message of the FSC and label. If It seems the change won't help as intended, the hardship on certificate holders is not worth it.
Model A	G	Needs clear clarification on what you mean with "For other products, the product type shall be used unless all materials of the product and its packaging/content are covered by FSC certification."
Model A		Options A "Three label model" is not an improvement. "Mix" doesn't mean anything to the consumer and in fact is confusing. Consumers don't understand Controlled Wood and I'm not sure they should need to. FSC should be able to stand behind its Controlled Wood System and ensure that those that are controlled wood certified, transition towards full certification within a given time. Keep the consumer messaging simple and don't overcomplicate it!
Model A	G	Option A: This option does not provide any clarity to the current MIX label. All three examples say the same thing in different manners. From a consumer perspective, "from responsible sources", "supporting responsible forestry" and "from certified or controlled material" are the same thing. In addition, the examples do not include recycled material as input for MIX. Please provide clarification whether "from certified, controlled, and recycled material" is acceptable as text. If adopted, we support the added text being an optional part of the label, and the current text "from responsible sources" should remain an option. This eliminates need to change for companies who do not use the text or would not benefit from changing the text.
Model A	G	The need for clarifying the Mix claim in the FSC label seems to be an internal and political issue within the FSC organization. From the perspective of the license holders and particular for the customers and the end-users this discussion is not relevant at all. The existing on-product FSC label is already very complicated and contains many elements which the end-users don't consider to be relevant. Basically the end-user is looking at the "Tree" and the letters "FSC" and they don't care about the material category and the rest of the text and they don't read it.
Model A	T	A.2 would be too technical/ A.3 not showing information at first sight/ too much effort for consumer
Model A	G	There is no value present in differentiating or changing current wording within the FSC Mix label to the proposed wording. The consumer is still not going to understand this new wording and the cost of change is extremely high to already engaged certificate holders that are doing the right thing.
Model A	G	Though I do find the current representation effective, as documented above, I feel option A.1 is a very viable alternative/change. "supporting responsible forestry" makes strong statement and it would go a long way to addressing any current concerns in the marketplace about a degree of vagueness attached to the text reading "from responsible sources". I do feel if this changed is well communicated to the marketplace and the end users it could in fact strengthen the FSC brand. As noted above, while I do like the text being voluntary, I also believe that many printers will continue to use Mix and Recycled because it will continue to be important to many of their clients to showcase to their end users. With Mix and Recycled included in the printed Trademark, printers' clients can compare the printed piece to the claim on a packing slip or invoice if they wish. A.2. "from certified and controlled material" is vague. A.3 URL for further information. Question whether many in the marketplace will take the trouble to visit the site and if they do, will find it too convoluted to search for the information. Though I do find the current representation effective, as documented above, I feel option A.1 is a very viable alternative/change. "supporting responsible forestry" makes strong statement and it would go a long way to addressing any current concerns in the marketplace about a degree of vagueness attached to the text reading "from responsible sources". I do feel if this changed is well communicated to the marketplace and the end users it could in fact strengthen the FSC brand. As noted above, while I do like the text being voluntary, I also believe that many printers will continue to use Mix and Recycled because it will continue to be important to many of their clients to showcase to their end users. A.2. "from certified and controlled material" is vague. A.3 URL for further information. Question whether many in the marketplace will take the trouble to visit the site and if they do, will find it too convoluted to search for the information. Though I do find the current representation effective, as documented above, I feel option A.1 is a very viable alternative/change. "supporting responsible forestry" makes strong statement and it would go a long way to addressing any current concerns in the marketplace about a degree of vagueness attached to the text reading "from responsible sources". I do feel if this changed is well communicated to the marketplace and the end users it could in fact strengthen the FSC brand. As noted above, while I do like the text being voluntary, I also believe that many printers will continue to use Mix and Recycled because it will continue to be important to many of their clients to showcase to their end users. A.2. "from certified and controlled material" is vague. A.3 URL for further information. Question whether many in the marketplace will take the trouble to visit the site and if they do, will find it too convoluted to search for the information. Removal of reference to Three labels model because A.1 would be the only supporting text to use with the FSC Mix trademark. Agree that the statement reading "text is voluntary and the label may be used without it" should remain.
Model A	G	Preference is for us A but from our point of view the actual MIX logo text is more significant than the new proposed ones , we would leave the text as it is
Model A	G	Preferred option if status quo is not possible. It distinguishes between the different existing FSC claims. However, there should be a transition period for the certificate holders to get rid of existing stocks of labels. This would probably have less of an impact on certificate holders as only the current FSC Mix standard labels would have to be change.

Model A	G	<p>Instead of adding clarity, it complicates the message.</p> <p>1. Why is product type needed in the on product label? Can't the reader see what the product is? A company with multiple products will have to build a system to label multiple products based on the product name in the label. This adds cost and complexity, and increases the potential for errors.</p> <p>2. It is unclear why A.1 "supporting responsible forestry" and A.2 "from certified and controlled material" are both needed. In a MIX situation, there will always be the possibility of certified and controlled material. Doesn't an FSC certificate holder, by definition, support responsible forestry?</p>
Model A	G	<p>The "three labels model" proposal does not meet the objective of the label revision, to "find ways of making truthful on-product claims in a simplified manner". This label is very similar to what is being used right now for products containing Controlled Wood, and doesn't address the fact that most consumers (especially the public) do not clearly understand what the "mix" label/term means. Moreover, the text underneath the "mix" label is the only thing distinguishing between the different types of "controlled wood"/MIX products. However, this text, so far, would be voluntary and therefore would not achieve enough transparency about the source of the product.</p>
Model A	G	<p>In order to achieve the objectives of the label revision process (truthful, simple, transparent labelling) the label must clearly state what percentage (%) of the product comes from certified sources. In situations where there might be a margin of error regarding the exact percentage of the product coming from certified sources, the label shall state what the minimum guaranteed certified content of the product is (eg.: &gt;70% from certified sources). Identifying the % of the product fully FSC certified should be obligatory and not a voluntary measure. This option would also provide a built-in incentive to increase the certified content over time, which was one of the original goals of the Controlled Wood/Mix program when it was created. This approach has also been used successfully in other labelling markets, such as the labelling of organic food, where the % of organic ingredients is specified on labelled products.</p>
Model A	G	<p>We strongly support Option A. Option B does not allow the promotion of 100% certified products over mixed products in the market place. The "one label model" also fails to meet the objective of the label revision.</p>
Model A	G	<p>We support the suggested text A.1, "Supporting responsible forestry" under model A for the MIX label.</p>
Model A	G	<p>In general option A gives a more precise information to the consumer, thus raising awareness and supporting creator transparency of the FSC scheme</p>
Model A	G	<p>None of the proposed wording solves the original concern (at least to me). It has to be a lot easier for consumers otherwise no change should happen.</p> <p>The important point here is any change to mix label text will affect more than half of certificate holders. And current proposed wording will not solve the original concern about the ambiguity of mix label.</p> <p>Something like below is easy enough for consumers to understand.</p> <p>Keep away from unknown, uncertain, risky materials.</p> <p>Once the decision on whether to go with option A or B has been made, and FSC decides to go with option A, there is a need to further consult on the actual wording used in mix label.</p>
Model A	G	<p>This should be a non-starter as an idea. To anyone not actually versed in the FSC system, the words "responsible forestry" and "certified and controlled material" or, really, anything even close to those descriptors is just gibberish. It means nothing. For example, I actually convinced my grandmother to look for the FSC label. She was 87. She didn't need to do that. But she did. She understood the value inherent in the concept. However, when I started talking about the differences between certified and controlled wood, her eyes glazed over. Controlled Wood? She simply didn't care, it was extraneous to her needed understanding.</p> <p>Point being, unless your label changes are so basic that anyone can understand them, with absolutely no outside knowledge, they are pointless changes. Three labels, "Good", "Better", "Best". Anything more specific will be lost on the average consumer. Use "Grade A, Grade B, Grade C", it doesn't matter what you choose. I don't actually have a problem with 100% and Mix. But, if you're going to have separate labels, it has to be this level of simple. Save the explanations for somewhere else. Spend some time trying to convince companies of the benefit of sharing that information on a hang-tag. I don't know the answer to the problem but I do know that writing a thesis inside of a label isn't the answer.</p>
Model A	G	<p>Any retrospective changes to artworks (our cartons which have FSC mix label etc.) will come at a cost for Oriflame – Artwork origination fee, change to Bromide etc. Our preference is that no changes need to be made to already approved artworks. We could implement for future products given enough notice (please note that artwork approval is required well in advance of production).</p>
Model A	T	<p>I support Option A for on Product Labelling as it provides the most clarity in terms of what the label is representing and distinguishes between FSC 100% and FSC Mix.</p>
Model A	G	<p>Sierra Club supports Option A and is strongly opposed to Option B. The text in the tagline should read "Supporting responsible forestry"</p>
Model A	G	<p>In my opinion option A is the better one because it gives more information about the product at first sight.</p>
Model A	G	<p>Make the FSC number smaller and increase the size of the description because this is more important in my opinion.</p>
Model A	G	<p>To me supporting responsibly forestry does not fulfill it.</p>
Model A	G	<p>We support option A. (Three Labels Model) The effort to change the previous logo uses remains low, because only the Text in the Mix-Label would change. Only the graphic files would need to be replaced. Also there would be no need for training.</p> <p>A study is recommended, if not requested, that investigates how the product labels need to be designed and which content they should have in order to respond to the consumers perspective.</p>

		<p>Through this the essential details could be identified (Size, text, color etc.) that is needed to label products.</p> <p>The approach to develop the basic versions of the product labels through the consultation of a discussion paper is rejected. A well-thought approach would be to compare different product labelling schemes and/or to elaborate a study that develops the labelling based on the consumer perspective. Firstly a concept is needed that focusses the claim/statement/promise in relation to product labelling – the technical details how to implement the solution and how to define rules can be developed as second step. Companies have declared their willingness to support such an approach and contribute with their knowledge and expertise. Less academic, more consumer-orientated communication through the label is needed.</p>
Model A, B	G, T	<p>FFIF does not support either option A or B. As said above the existing label models are well known and the changes would only result in confusion. In addition, the changes would cause extra costs to companies, even though FSC has emphasized user-friendliness and cost-efficiency etc. (FSC Global Strategy).</p> <p>In case of the option B (one label model) the visibility of the recycled grades would be lost. To show that is essential at least among many customers of pulp and paper companies.</p> <p>FFIF emphasizes the importance of continuity. This means that existing logos/labels (FSC 100 %, FSC Mix and FSC Recycled) should be kept also in the future.</p>
Model A, B	G	<p>Forests of the World can only support Option A and find option B entirely unacceptable.</p> <p>The reason we find option B to be unacceptable is that it would make it impossible to promote certified products over mixed products in the market place.</p> <p>Another way to effectively eliminate one of the labels would be to phase out the Mixed label and controlled wood system as we know it today – we think this should be the goal rather than continue to favour a system that effectively undermines the credibility of the FSC and creates perverse incentives away from credible certification of good forest management.</p>
Model A, B	T	<p>None of the options addressed the concerns raised by members.</p> <p>In option A:</p> <ul style="list-style-type: none"> <li>• A1: text does not imply in a better understanding about FSC Mix label;</li> <li>• A2: would cause even more confusion because the majority of consumers does not know the meaning of "controlled" to FSC;</li> <li>• A3: would increase the complexity in the purchase decision making process once the consumer would need to search for information on a website and the possibility of this happen in practice is remote.</li> </ul> <p>In option B, the use of a single label would become the information simpler, but at the same time incomplete. The consumer cannot know what effectively he/she is purchasing.</p> <p>The suggestion is to make a research with the consumer to verify what they already understands about FSC Mix today, and what else they would like to know about this kind of product.</p>
Model A, B	G	<p>We support model A. "Three labels model" and reject model B. "One label model." Model A maintains a distinction between 100%, Recycled, and MIX products, which is integral to providing customers with information about the products that they are purchasing and distinguishing between the different "levels" of FSC certification. Switching to model B would provide a false sense that all FSC-labelled products are certified in the same manner/to the same extent when controlled wood is not held to the same standard as forest management certification requires. The lack of distinction offered in model B could undermine consumer confidence, posing a severe reputational risk to FSC.</p>
Model A, B	T	<p>I support Option A and reject option B. The text in the tagline should read "Supporting responsible forestry". However I still think a fuller descriptive distinction between FSC 100% and FSC Mix needs to be made.</p>
Model A, B	G	<p>FSC Denmark believes that it is preferable to introduce labels without text as standard if the alternative is the option to choose non-specific text material such as B1, B2, A1 and A2. These "system" texts are very general and is maybe truthful and more simple but at the same time very vapid OR keep the current labels as they are.</p>
Model A1		<ul style="list-style-type: none"> <li>- Pros <ul style="list-style-type: none"> <li>o Best language of the three scenarios in the A Model</li> <li>o Suggest using the word "Paper" (or whatever may apply...) rather than the term "Mix" which can be ambiguous to the consumer. Using the terms "paper" or "wood" clearly identifies to the customer what is certified and what is supporting responsible forestry (see our final suggestion)</li> </ul> </li> <li>- Cons <ul style="list-style-type: none"> <li>o Almost the same as the current label</li> <li>o If the voluntary language is left out, it tells the customer less than the current label, but if the voluntary language is used then there is no substantial change from the current requirements of the label</li> </ul> </li> </ul>
Model A2		<ul style="list-style-type: none"> <li>- Pros <ul style="list-style-type: none"> <li>o Material classification is still required as part of the label</li> </ul> </li> <li>- Cons <ul style="list-style-type: none"> <li>o The terms used in the voluntary language may be lost on the average consumer</li> <li>o May become illegible because it is too wordy/too many lines of text</li> </ul> </li> </ul>
Model A2		<p>"From certified and Controlled material wood" seems to me the more appropriate option</p>
Model A3		<ul style="list-style-type: none"> <li>- Pros</li> <li>- Cons <ul style="list-style-type: none"> <li>o If the voluntary language is removed it almost becomes the current FSC promotional label</li> <li>o If the voluntary language is kept, Domtar believes there is a low likelihood that a site visit will occur to learn more about what the label means/represents</li> </ul> </li> </ul>
Model A3		<p>I doubt a lot of people will go and consult information on site</p>

Model A3		Option A3 is welcomed.
Model B	G	I want to suggest the use of a unique label; the text shall be voluntary as now specified in the draft standard. I think that in order to simplify the message also the text should be unique for the different FSC category since it is possible to label a product only if that product respect the FSC standard (also the recycled material respect the FSC standard for reclaimed material).
Model B	G	In the long run, one label for all products would definitely simplify things. However, as I stated above, unless the change will definitely increase clarity and achieve the stated goals of the concerned FSC members, the burden on clients is not worth it.
Model B	G	This is the best solution as the consumers do not differ between FSC Mix, FSC 100% or FSC Recycled – they just see the “FSC” initials. It would also remove the problems about CHs not using the corresponding on product label according to claims on sales documents.
Model B	G	I prefer the B.3 “Responsible use of forest resources” as this is the most simple text of the three proposed texts.
Model B	G	For option B you have also the disadvantages: all on-product labels and its information will change. You are giving less importance for the status of the products (not very good to promote certified products 100% FSC)
Model B	G	The one label model is preferred because it contributes to making to simplify the organization activities. Moreover in my opinion the final client do not understand all the information present in the current FSC label.
Model B	G	I think it's simpler and allows less confusion and source of errors to adopt one label for all FSC claims. So option B. shall be preferred. As for the sentence, option B.3 is the simpler and more communicative one, so it would be my choice.
Model B	T	Embedded costs for certificate holders using the existing labels include artwork plates, rather than only existing stocks of labelled product and promotional materials. Updating artwork for previously approved packaging is very expensive, particularly certificate holders with hundreds of labelled products, each with unique packaging artwork and printing plates. A hard change (i.e. revising artwork for the purposes of updating the logo) rather than a soft change (i.e. applying the new logo if and when the packaging is updated for any other reason, such as design and copy) is untenable for certificate holders. The cost for such a hard change would be in excess of \$100,000 for our organisation.
Model B	T	Applying a “one Logo” label to a recycled product is misleading, because FSC is associated with Responsible Forestry rather than recycled fibre.
Model B	G	The most important text to highlight is the type of product (e.g. “Wood”), and then to include a message explaining what the label means. Option B3 does this well and explains to the consumer what impact they can have by buying this product. The messages in B1 (Meets standard of FSC) and B2 (In line with standards of FSC) doesn't explain this and adds no value. Therefore only Option B3 is an improvement and would be the best option. Any differentiation in the label should be on recycled (with the Moebius loop) and Smallholders/community forestry messaging.
Model B	G	I agree with option B as proposed
Model B	G	Option B: We do not support the single label option. This costly change provides no additional value. It does not make it simpler to make on-product claims, as the criterion for making claims remains unchanged. It merely removes choice in what label to use, while providing non-specific claims to the consumer.
Model B	T	The one-label-model should not become reality, as it is important for consumer to identify source of material. To make a safe decision, market research on consumer response on labelling should take place before decision on label models.
Model B	G	If a change to the trademark must be made, the value of having one streamlined easy to use label that the consumer already understands exceeds the disadvantage of not differentiating claims for well informed parties. Because the text is general in nature, an understanding of what FSC Mix means will never occur out of a label such as this. The label is supposed to represent that the product sourcing and consumer support FSC and what FSC stands for which represents a value and message that is degraded by having multiple choices.
Model B	G	In a holistic and consumer perspective and also longterm perspective for our company this suggestion – especially if it is voluntary to use the text – is preferable as the consumers are not able to see or know the difference between the different FSC labels and what is behind them. So if this was approved we would probably choose a label without text as it would be generic and easier to implement/use and to understand for customers and consumers.
Model B	G	The attempt to simplify labelling for FSC products is a good thing. The label would reflect the system as a whole. What is important for the customers to know is if the product is FSC certified or not. Few people really know what is the difference between the particular material mix. Moreover, the simplification of labelling would also reinforce FSC image, as it would be easier for the customers to understand the labels and give more sense to the certification and its identity.
Model B	G	Suggested text identified in this section is not required as per comments above, with either the current situation or A.1 being, in my opinion, the only options. The options outlined in B are too confusing and I believe weakens the strength of the FSC brand. No changes required to present standard, or changes as identified about regarding the A.1 option with the inclusion of “the text is voluntary and the label may be used without it.”
Model B	B	Clear preference for one label model. Much clearer towards suppliers as well as customers. Customers demand FSC, they usually don't care about the specific claim, and often they do not even know that there are different claims. So we prefer option B2. We don't consider the perceived or projected disadvantages as a disadvantage!
Model B	G	No useful for us, we prefer to see immediately on the logo if product is MIX, 100% or recycled
Model B	G	If decision makers at FSC decide that the artwork shall be changed, then the option B.1 is preferred. In the sense of simplification, the advantages of the “One Label” option outweigh the others. Old

		artwork (current valid) shall be allowed to use without any deadlines. Printing plates are very expensive and probably artwork will be not used, if new printings plates must be created....
Model B	G	We might as well forget about on-product labelling and use only promotional labels if this becomes the preferred way. The suggested one label model is closer in design to a promotional label. This option would have a bigger impact on certificate holders as all existing and approved on-product labels would have to be phased out and replaced by a one label model. There also needs to be a transition period to phase out current stock of on-product labels.
Model B	G	Tetra Pak is strongly in favour of simplifying the message of label. Currently the label is quite confusing, and no one, except for FSC CoC experts, really understands what the wording MIX means. Making the message clear, without for that reason being watered down, is our preferred option. Hence we vote for option B.
Model B	G	1. As with Option A above, a company with multiple products will have to build system to label multiple products based on the product name in the label. This adds cost and complexity, and increases the potential for errors. 2. Voluntary text does not add value. B.1 "meets standards of Forest Stewardship Council" and B.2 "In line with standards of Forest Stewardship Council are new undefined language. Where did it come from? What is the difference between "meets" and "in line with"? How do "well-informed parties" differentiate, to say nothing of "Uninformed parties"? Why does B.3 "Responsible use of forest resources" fit in? does it imply MIX (which uses "responsible" in its' current language)?
Model B	G	I support the use of a single label model. Where it is imperative to differentiate between a recycled product and a responsible virgin product, the Moebius loop can be used (as stated in the discussion paper).
Model B	G	The "one label model" also fails to meet the objective of the label revision. Once again, the text underneath the "wood" label is voluntary. Considering that in this model, the text is the only thing making the difference between the different sources/products, it means that differentiating the Controlled Wood products would become a voluntary measure. This is clearly a step backwards from the previous label models and is misleading the consumers.
Model B	G	Companies, participating in the information meeting, find that if a company sell different claims and labels products according to these then the proposal of only one label will sure reduce administrative burdens.
Model B	G	There is an unanimous support for option B. Option B is welcomed as a true simplification of the rules. Transition period: flexibility for out-phasing 'old' labels is requested; and take into account that the 'lead time' for e.g. garden furniture is 1,5 years! The CH's unanimously request FSC for a clear vision on the trademark policy and proper outlook for the years to come and not (again) take the CH's by surprise with yet another logo; changes do cost money and do take effort! Do not require 'old labels' (applied under the jurisdiction of the current standard) to be removed or relabelled.
Model B	G	See comments on part A. The same basic problem exists with this suggestion. You're making "one label" by removing the words "100%" and "Mix", but you're suggesting leaving entire phrases in the label, to be used voluntarily. No one is going to use those 'voluntary' statements. This, along with every suggested change, is going to ensure that only the 'mini' label will be used in almost all situations. More likely, its going to annoy potential users just by its existence, and existing users because you're changing the label yet again, and just end up causing less label usage overall.
Model B	T	I find preferable option B: one label model. It is easier to use and provides enough information that otherwise can be looked for in FSC web site.
Model B	G	I prefer option B because the label text sounds more professional and more reliable.
Model B1	G	The % of people who are interested and enough to look beyond the presence of a label to the details on the label is low in the Australian and New Zealand markets. This consumer segment has been estimated as around 14-15% of all consumers. The suggestion that the lack of differentiation leading as a disadvantage is limited and should not prevent Option B being progressed.
Model B1		- Pros: o Domtar believes that the concept of this model would align with FSC's overarching goal of simplifying the on-product label application process and makes it easier to make clear on product claims to the consumer - Cons o FSC is mentioned 4 different times within the label. This may be too much/excessive o Similar to one of our earlier comments, having 3 lines of text makes this scenario too "wordy" and runs the risk of the label becoming illegible o Is the voluntary language proposed the only language that can be used? Using the word "Certified" in the voluntary text space may be simple and clear enough? o If the voluntary language is removed from this scenario then there is less information than the current label and therefore making more ambiguous in Domtar's opinion
Model B2		- Pros - Cons o The language used for the voluntary statement is confusing, and makes it appear as though the material may be not be certified. The language seems to make an unqualified statement and appears to be too similar to Controlled Wood o If no voluntary language is not included with this label at all then this becomes the current promotional label o Same as option A3 but with even less information

Model B2	E	The options “ in line with standards of Forest Stewardship Council” should be eliminated as too academic
Model B3	G	The suggested benefit that less administration will be required because all products of brand owner can carry the same label, is not true. Brand owners typically have hundreds of labelled products, and administration is undertaken on a product-by-product basis, rather than an enterprise basis.
Model B3		- Pros o Domtar believes that this option has the best language within the label o Overall label structure is the best of all options (Model A and Model B). Very concise and clear - Cons o If the voluntary language is removed the label essentially becomes the current promotional label o May be too ambiguous for the average consumer if voluntary language is not included
Model B3	G	Grakom supports the use of only one FSC label. This will make the administration much more simple for the license holders and reduces the number of none-conformities. A simpler label will be a great advantage for the use of FSC in the market and for the understanding of the label and the FSC certification among the end-users. Based on the suggested labels we are strongly in favour of option B.3 because it gives a clear message to the end-user what FSC is all about. This awareness among the customers and the end-users is significant if we wish the FSC certifications to spread.
Model B3	G	Of all the options given B.3 is the best alternative.
4. Overview	G	I believe that the on-product-label is a visible sign of the certification of the product. But it is not used as documentation for the consumer or the buyer. The consumer/buyer uses the attached documents as documentation for the certification and for documentation for the different claims. I Believe it will be easier to use labels on-product and to convince the consumers of the advantages of FSC, if they do not have to be completely informed of the claims, but only the FSC or not.
4. Overview	G	Any obligatory change to the labels should be fully communicated and phased in over an appropriate period of time to minimise costs to FSC stakeholders.
4. Overview	G	Should an analysis of the market and cost implications of the two options be undertaken (in line with Criteria 1.1.1 of the Global Strategic Plan)?
4. Overview	G	It may not be the case that “All products of producer or brand owner can carry the same label, less administration required” as the product type may vary. It is important to note that the product type requirement will still result in different labels.
Entire document	G	Don't agree to have 2 standards to be followed – not practical to use and approve. Only creates more possibilities of misuse. Define all requirements only in 1 document (preferably in FSC-STD-50-001 since this is the standard already known.
Entire document	G	I would not support Option 2. This does not reward people who want to achieve 100% FSC and could lead consumers being misled
Entire document	G	Option 1 with A.2 would be preferable if the labels had to be changed
Entire document	G	Motion 29 states very clear: To support FSCs strategic plan and the brand positioning process FSC® is requested to redefine the FSC® trademark standards in order to facilitate larger use of the FSC® trademark on conforming products and in off-product promotional uses. This includes both simplification of requirements for trademark use and of approval procedures, but it excludes changes to current artwork that would impact trademark registration. If it may not be necessary to change the current artwork, then it should not be changed, and the running system should be maintained.
Entire document	G	If decision makers at FSC decide that the artwork shall be changed, then the option B.1 is preferred. In the sense of simplification, the advantages of the “One Label” option outweigh the others.
Entire document	G	RA requests that the FSC labels do not change. 1) Changing the labels provides CHs with additional costs. This could range from smaller expenses such as having a stamp re-made, to large expenses such as printers having to make new plates for the majority of their jobs. When the trademarks changed to the newer style in 2009, printers were very upset with the large costs, and were not able to pass this cost to their clients. 2) A change to the MIX label under option A causes expense without much change. It could create negative criticism for having to spend significant amounts of money for such a minor change. 3) RA requests that FSC does not adopt option B.
Entire document	G	FSC label design has been repeatedly changed in three or four years in the past. When design was changed, clients always made complaint about it, because it cost very much for companies to change package design. Clients always said that “who will pay the additional unnecessary cost?” Even though they may use stocks with old labels, they should change the label design finally at some point. So, wish of clients is not to change the FSC label design in such a short period. Minimum change to the label design will be preferred.
Entire document	G	Comments by Alison Pilling (Trademark Manager for Soil Association Certification – we don't find any of the examples simplify the process enough to be worth making the change. It will be expensive, frustrating and time consuming to change the labels and so the value must be far greater than the sum of the disadvantages. When the labels changed to 100%, MIX and RECYCLED, the difference between the old and new labels was clear enough for us (as approvers) to immediately see what was being used. These new examples are not sufficiently different to be clear that the newest format of labels would be used. The language is not sufficiently clear in the discussion document to enable inexperienced clients or approvers to understand what the subtleties of words mean. I am not even clear if it is only the MIX label that will be changed and whether each option A and B will provide 3 choices or if only one of the 6 options will be chosen. If there is no option to reconsider from scratch, then I would vote for A.2. Given that most clients will opt to omit the text, does any of this soul searching help? Until the diverse and polarised views can be harmonised, no changes should be made to the existing labels. Controlled wood should still be seen as ‘responsible sources’ or should be removed from the FSC

		System altogether. Perhaps the Credit system should be rethought and then the text for the MIX label (from responsible sources) would be fine.
Entire document	G	There is no improvement in any of the examples and the changes should not be made until the benefits will outweigh the inconvenience, misunderstanding and cost.
Entire document	G	The solution B is much more recommendable. It is really much more easier for a customer to recognize only one label. Differences between Mix/100% or Recycled label can't be appreciate by most of the customers
Entire document	G	The new FSC Global Strategy is based on Promote Forests , Embody Credibility , credibility guarantee, transparency, true message to consumers, empower people, create value to product from community and small holders producers. All this strategy is in accordance to previous approved motions and the Stakeholders demand . FSC cannot approve a Global Marketing Strategy contrary to its practices and values. The labels shall be a transparent way to communicate the origin to consumer and empower them to choose their FSC products.
Entire document	G	The text cannot be optional, and shall be mandatory, ensuring transparency and reducing the complexity of approval process. -The option B shouldn't exist. Although it seems a simplification, goes against transparency of the origin of inputs. -We support option A2, including a specific label to reclaimed material. The label text shall describe the exactly product composition , changing "material " for "forest" in case of forestry origin and specific label to reclaimed material. Text recommendation: - de florestas certificados e controladas From certified and controlled forest - de florestas certificadas, controladas e materiais recuperados From certified and controlled forest and reclaimed material - de florestas de pequenos produtores certificados e controlados From certified and controlled Small holder forest - de florestas comunitárias certificados e controlados From Certificates and controlled community forests -De material recuperado : From reclaimed material The Label Generator can give the options to choose the specific word according to the product composition.
Entire document	G	Me parece un excelente trabajo no surge ningún comentario (I think it is an excellent job, no comments added)
Entire document	T	None of the options addressed the concerns raised by members. In option A: • A1: text does not imply in a better understanding about FSC Mix label; • A2: would cause even more confusion because the majority of consumers does not know the meaning of "controlled" to FSC; • A3: would increase the complexity in the purchase decision making process once the consumer would need to search for information on a website and the possibility of this happen in practice is remote. In option B, the use of a single label would become the information simpler, but at the same time incomplete. The consumer cannot know what effectively he/she is purchasing. The suggestion is to make a research with the consumer to verify what they already understands about FSC Mix today, and what else they would like to know about this kind of product.
Entire document	T, G	We prefer option A.1, because avoid the change of all existing labels, but we think that doesn't simplify anything. Are the consumers trained and educated enough to understand the difference between the current logos or those of the option A? We think not. The differences between Mix and 100% are for companies and experts and they can use documents for checking. If you want simplify the "message", we think that you have to use a logo like new ForestForAllForever, or option B.3. We recommend you of consult experts of marketing and branding about this.
Entire document	T, G	Option (A) VS. option (B) - 25 stakeholders (out of 39 voting stakeholders) expressed their preference for Option (A) - 10 stakeholders (out of 39 voting stakeholders) expressed their preference for Option (B) - 4 stakeholders (out of 39 voting stakeholders) abstained from expressing their preference Suggested text Rationale - Stakeholders preferring Option (A) particularly highlighted that: o This option would be a basic prosecution of the current situation, thus avoiding a dramatic change in all the existing labels. o It is very important to give continuity to the system, both for CHs and consumers. A relevant change in labelling requirements has already occurred in the past (e.g. "Pure" and "Mixed Sources" became "100%" and "Mix"). o Consumers need to be "educated" on the FSC scheme and on the recognition of its trademarks. To this point, recent survey show encouraging results, and it's not time to give up through this change. Some Questions &Answers released after a recent webinar (January 13th, 2016) on the FSC® Trademark Use Requirements Revision support this perspective. In fact, they contain this statement: "FSC is also increasing consumer communication to help explain the meaning of FSC and the label, so in the future part of the information would be transmitted through other channels as well."

		<ul style="list-style-type: none"> <li>o In order to “simplify” the message and to make it easily understandable by everyone, Forests for All Forever trademarks will help: thus, it’s not necessary to further simplify also the product label elements (already done through proposed Clause 3.4).</li> <li>o Technical aspects are important and they do not contrast with the brand strategy. In any case, the difference between “100%”, “Mix” and “Recycled” is intuitive also from the consumer’s point of view.</li> <li>o 100% products would be discouraged, as no difference with FSC Mix or FSC Recycled product would be clearly detectable by consumers. The idea of highlighting the different categories through different optional texts is totally utopic.</li> <li>o General texts in B have no salience at all.</li> </ul> <p>- Stakeholders preferring Option (B) particularly highlighted that this option would simplify the labelling options, also through the lens of the final consumer.</p> <p>Other remarks</p> <ul style="list-style-type: none"> <li>- We, FSC Italy NO staff, strongly prefer Option A.</li> <li>- A request has been collected by one CH, i.e. to specify that, if labelling options will be changed, no selling constraints will be experienced by labelled products that will have been already produced with previous label versions/options.</li> </ul>
Entire document	G	Para las organizaciones que contamos con esta importante certificación FSC, debería haber más unidad y apoyo para su divulgación con fuerza en el mercado. Alianzas de comunicación.
Entire document	G	In my field, printing business in France, only 15 % of printer are FSC certified and when they are certified, they produce certified documents with your logo only when it’s imposed by their client (in my estimation max 5% of printing materials printed by the 15 % ), because it’s too much complicated and too risky for them if they made a mistake. The more the use of FSC label will be clear and easy for certified company, the more your label will be printed on documents and the more you will promote the use of Responsible forest resources, one of my customer tell me once that he regards FSC label and FSC rules like "a scotch tape under a shoe" ...
Entire document	G	I would rather that they keep it (the FSC on product label) as it is as this means that we have to change paper work yet again.
Entire document	G	This proposal (regarding the FSC labelling) appears to be another attempt to confuse, just further bureaucracy for the sake of it.
Entire document	G	Regarding the consultation on logos, we are a relatively small producer and our current use of the logo is on product where applicable, on promotional materials such as brochures and on invoices and delivery notes. We favour the continuation of the current MIX logo as it explains as clearly as is possible in such a small space, that the material is from sustainable sources. The cost to us of having to make a change would not be inconsiderable – around £400 to change the artwork plates for each polythene pack, and other costs for the brochures etc. However, if change seems to be the preferred option following the consultation, we would select option B3.
Entire document	G	Columbia supports the idea of splitting on product labels to support inclusion of controlled wood with its attendant implications. FSC needs to be more transparent about what is in an FSC MIX product. All logo designs look reasonable to us. We do not see an imposition if this is for on product labelling only as we do this electronically with thermal printing devices where the logo data can be changed easily. If there are changes to promotional use, though, we would have issues unless there was a long grace period equivalent to two years or so as revising collateral is costly and time consuming. As a GA attendee, I recall there was a motion to specifically address the difference in claims between “supporting responsible forestry” and purchasing “wood confirmed as 100% from well managed forests.” We think you got the idea right with this on product label revision effort.
Entire document	G	Motion 29 states very clear: To support FSCs strategic plan and the brand positioning process FSC® is requested to redefine the FSC® trademark standards in order to facilitate larger use of the FSC® trademark on conforming products and in off-product promotional uses. This includes both simplification of requirements for trademark use and of approval procedures, but it excludes changes to current artwork that would impact trademark registration. If it may not be necessary to change the current artwork, then it should not be changed, and the running system should be maintained.

Entire document	G	<p>To reiterate Domtar's initial recommendation, Domtar recommends keeping both trademark usage guidelines given the proposed options are not substantial enough to drive meaningful change. FSC should take into consideration the resources (working time, inventory, redesigning and implementing new packaging components, printing plate costs, etc.) required to implement any changes for large corporations/companies when making their decisions.</p> <p>Even though the current "MIX" label may cause some confusion in the market, our experience has shown that individuals particularly concerned about the wording reach out to the manufacturer. In such occasions, Domtar has provided further explanation about the meaning. FSC may consider adding this information to its website, providing consumers a simpler alternative for finding further information than contacting various producers. However, with the MIX label having been present in the market for a sufficient amount of time at this point, inquiries around the label's meaning are now few and far between.</p> <p>If for some reason maintaining the current label is not an option, Domtar favors the concept behind Model B of having one label for all FSC products. A single label system could serve to reduce confusion amongst consumers, who often may not be familiar with the mark in general, much less the claim within the mark. In this case, none of the present options appear acceptable. Rather, a hybrid between options A1 and B3 would prove the most beneficial.</p> <p>The below purposed hybrid label includes the required checkmark tree and website, while taking the required certified material distinction ("Paper") from the Model B "one label" model while also taking a portion of the language from A1, "Supporting Responsible Forestry." The text circled in red would be the optional text portion of the label, but we think it is imperative that the certified material distinction is included on any iteration of the on-product label.</p> <p>Even in this case, the changes are similar enough to Domtar's current label that the average consumer would notice no difference, calling into question the value of making any changes at all.</p> <div data-bbox="730 1144 1050 1556" data-label="Image"> </div>
Entire document	G	<p>Currently the majority of FSC labels within the marketplace are FSC Mix labels. Either a change to the mini label or a change in product type wording will represent great cost of change for the majority of trademark use. This cost should be examined by FSC. If the change is not to a streamlined label that is meaningful the cost of changing will exceed the benefit. The options provided are meaningless as all companies will change to the sleek look of the mini label elements which should be allowed to be used as the default label.</p> <p>In 2008 the labels indicated when controlled wood was in a product and for the most part consumers and certificate holders in general did not understand the labels that indicated what was within the product. To move back to the model that indicates what is within the product in any way is a step in the wrong direction for FSC.</p> <p>We are not in favour of Option A or Option B but instead prefer the current label wording with a default label as the mini label to be allowed. The current labels offer three titles that though not widely understood, do provide a public benefit as the labels differentiate among claims for those aware of the label meaning. The text option changes are so miniscule that the consumer will not understand.</p> <p>In today's age of internet, websites are becoming the universal location to learn about labels. In place of changing the labels and to facilitate understanding of the current labels, we suggest a box on the www.fsc.org home page that explains the meaning behind any label platform that is chosen. FSC should concentrate on how to create awareness of their label easily on their webpage for the</p>

		consumer and the one consistent place that has meaning and represents the best area of concentrated resources.
Entire document	G	From our companies' point of view it would be easiest to keep the current FSC MIX label as it is.
Entire document	G	We apply on-product labels with corresponding certification category for each product. We bore enormous cost for changing labels when the registration mark was changed from © to TM, and to the current (R). We supply so many different product items, and would like to avoid the cost by the label change. We do not find problem with the current label, and we support no change to the existing one.

Entire document	T	<p>Both proposed option A and B do not allow consumers to understand at a glance what kind of input materials are included in the products.</p> <p>Especially for paper products, proposed Mix label under option A does not distinguish products which are made of 100% virgin pulp from those contains reclaimed materials. There are certain paper products for which input material quality characteristic is critically important such as high quality white paper and paper containers/packaging that meets food hygiene requirements. For these products, 100% virgin pulp is crucial. Our argument is not about grading either of certified timber or reclaimed material higher than the other. But for consumers and for FSC itself and especially for product manufacturers who want to differentiate their products clearly from others, it would be beneficial to enable the FSC label to make clear difference between 100% virgin pulp products from those contains reclaimed materials.</p> <p>Since the rule change about pre-consumer reclaimed material (now being claim contributing input for paper products), countries like Japan where recycling percentage is very high will be expecting a lot more FSC products with reclaimed input materials. So we would like to propose labels which enable us distinguish products made purely of virgin materials and products that contains reclaimed materials.</p> <p>In the next page, we propose labels which at a glance make people understand what is in the products easily. See the proposed labels on the next page.</p> <p><b>Proposal for new FSC Mix Labels</b></p> <table border="1" data-bbox="555 1189 1318 1809"> <tr> <td data-bbox="555 1189 683 1364">Input material</td> <td data-bbox="683 1189 906 1364">FSC Certified timber Controlled Wood Reclaimed Wood</td> <td data-bbox="906 1189 1110 1364">FSC Certified timber Controlled Wood Reclaimed Wood Reclaimed paper</td> <td data-bbox="1110 1189 1318 1364">Reclaimed Wood Reclaimed paper</td> </tr> <tr> <td data-bbox="555 1364 683 1406">Title</td> <td data-bbox="683 1364 906 1406">FRESH</td> <td data-bbox="906 1364 1110 1406">BLEND</td> <td data-bbox="1110 1364 1318 1406">RECYCLED</td> </tr> <tr> <td data-bbox="555 1406 683 1449">Shape</td> <td data-bbox="683 1406 906 1449">Square</td> <td data-bbox="906 1406 1110 1449">Oval</td> <td data-bbox="1110 1406 1318 1449">Oval</td> </tr> <tr> <td data-bbox="555 1449 683 1525">Text</td> <td data-bbox="683 1449 906 1525">Made from certified and controlled wood</td> <td data-bbox="906 1449 1110 1525">FRESH and recycled material</td> <td data-bbox="1110 1449 1318 1525">Made from recycled material</td> </tr> <tr> <td data-bbox="555 1525 683 1809">Proposed labels</td> <td data-bbox="683 1525 906 1809">  </td> <td data-bbox="906 1525 1110 1809">  </td> <td data-bbox="1110 1525 1318 1809">  </td> </tr> </table> <p>*Regarding the shape, the intention is to make it possible to distinguish different labels at a glance (especially those contains reclaimed paper).</p> <p>Square and Oval are just examples.</p>	Input material	FSC Certified timber Controlled Wood Reclaimed Wood	FSC Certified timber Controlled Wood Reclaimed Wood Reclaimed paper	Reclaimed Wood Reclaimed paper	Title	FRESH	BLEND	RECYCLED	Shape	Square	Oval	Oval	Text	Made from certified and controlled wood	FRESH and recycled material	Made from recycled material	Proposed labels			
Input material	FSC Certified timber Controlled Wood Reclaimed Wood	FSC Certified timber Controlled Wood Reclaimed Wood Reclaimed paper	Reclaimed Wood Reclaimed paper																			
Title	FRESH	BLEND	RECYCLED																			
Shape	Square	Oval	Oval																			
Text	Made from certified and controlled wood	FRESH and recycled material	Made from recycled material																			
Proposed labels																						
Entire document	G	<p>Given the proposed options, Model A (three labels) or Model B (one label), we fail to see any substantive improvements over the current situation that are noticeably different to the average consumer. The proposed options appear to be very similar to the existing on-product "MIX" label and don't provide benefits that outweigh the cost and time associated with implementing a change to</p>																				

		<p>either of them (software and hardware costs)  For the foregoing reasons, Resolute Forest Products supports the continued use of the current "MIX" on-product label.</p>
Entire document	T, G	<p>Option (A) VS. option (B)  - 25 stakeholders (out of 39 voting stakeholders) expressed their preference for Option (A)  - 10 stakeholders (out of 39 voting stakeholders) expressed their preference for Option (B)  - 4 stakeholders (out of 39 voting stakeholders) abstained from expressing their preference</p> <p>Suggested text  - All stakeholders preferring Option A expressed their preference for textual options A.1 and A.2, with a slight higher (not really significant) preference for A.1.  - All stakeholders preferring Option B clearly expressed their preference for textual option B.3</p> <p>Rationale  - Stakeholders preferring Option (A) particularly highlighted that:  o This option would be a basic prosecution of the current situation, thus avoiding a dramatic change in all the existing labels.  o It is very important to give continuity to the system, both for CHs and consumers. A relevant change in labelling requirements has already occurred in the past (e.g. "Pure" and "Mixed Sources" became "100%" and "Mix").  o Consumers need to be "educated" on the FSC scheme and on the recognition of its trademarks. To this point, recent survey show encouraging results, and it's not time to give up through this change. Some Questions &amp;Answers released after a recent webinar (January 13th, 2016) on the FSC® Trademark Use Requirements Revision support this perspective. In fact, they contain this statement: "FSC is also increasing consumer communication to help explain the meaning of FSC and the label, so in the future part of the information would be transmitted through other channels as well."  o In order to "simplify" the message and to make it easily understandable by everyone, Forests for All Forever trademarks will help: thus, it's not necessary to further simplify also the product label elements (already done through proposed Clause 3.4).  o Technical aspects are important and they do not contrast with the brand strategy. In any case, the difference between "100%", "Mix" and "Recycled" is intuitive also from the consumer's point of view.  o 100% products would be discouraged, as no difference with FSC Mix or FSC Recycled product would be clearly detectable by consumers. The idea of highlighting the different categories through different optional texts is totally utopic.  o General texts in B have no salience at all.  - Stakeholders preferring Option (B) particularly highlighted that this option would simplify the labelling options, also through the lens of the final consumer.</p> <p>Other remarks  - We, FSC Italy NO staff, strongly prefer Option A.  - A request has been collected by one CH, i.e. to specify that, if labelling options will be changed, no selling constraints will be experienced by labelled products that will have been already produced with previous label versions/options.</p>
Entire document	G	<p>A discussion about new label options is of course always nice to do but it will not be helpful as the core issues are connected with too much requirements and connected bureaucracy in the trademark standard as it is (still in the draft)  The process of label discussion via a discussion paper is not helpful and is refused as such.  It is recommended to evaluate (by a study) the current level of consumer understanding and do a comparison with other labelling schemes.  To our understanding it needs a less academic and more easy messaging communication which is focused on consumers who are non experts. The technical detailing can be done later on basis of the evaluation results.  It can be doubt that the normal average (non FSC expert) consumer can understand today's FSC label wording.  Such a study should also consider if a special color use, sizing, free space will influence the level of understanding at the consumer.</p>
Entire document	G	<p>Motion 29 states very clear: To support FSC's strategic plan and the brand positioning process FSC® is requested to redefine the FSC® trademark standards in order to facilitate larger use of the FSC® trademark on conforming products and in off-product promotional uses. This includes both simplification of requirements for trademark use and of approval procedures, but it excludes changes to current artwork that would impact trademark registration.  =&gt;If it is not really necessary to change the current artwork, then it should not be changed, and the running system should be maintained.</p>
Entire document, Transition period	G	<p>If there is a decision to change the on-product labels it is also critical to consider the transition period. Being in the packaging industry we have a lot of designs which are labelled, and updating all of them is not economically nor practically feasible. Large certificate holders like Tetra Pak with more than 100 billions of certified products would need several years to have all the old designs entirely phased out.</p>
Entire document	T	<p>As a FSC member UPM doesn't see any problems with the existing on-product label/logo options. Vice versa current logo options are working well and different FSC claims are clearly separated and FSC Mix label text 'From responsible sources' does in our opinion truthfully represent the materials and processes behind the label. In this situation we don't see any reason for the logo changes. If we have a working and stabilized situation with the logos/labels we shouldn't carry out any changes just</p>

		<p>in vain. Changes in logos/labels has happened quite often, latest one being only at the end of 2010. All changes to logos are causing confusion to certificate holders and to the customers to whom products are sold. All changes to the logos, even minor ones, are causing big extra costs (like packaging material renewals etc.) and in addition to this one year transfer time is too short and lead to the situation where we would have old versions + new versions on the market -&gt; confusion amongst our customers and consumers.</p> <p>Presented proposals, three label model and one label model are both creating extra costs and causing lot of work when current logos in use need to be changed. In addition to this one label model 'wipe out' totally recycled label/logo which is valued highly by the customers and therefore its visibility should be remained. Non-existence of the recycled logo might lead to loss of FSC certified businesses.</p> <p>Proposed change:  <b>To keep the current logos/labels with existing logo texts:</b>  <b>- From well-managed forests (FSC100%)</b>  <b>- From responsible sources (FSC Mix)</b>  <b>- Made from recycled material (FSC Recycled)</b></p>
Entire document	E	<p>"Trademarks and brands need to be established and maintained for the long term. The goal should be consistency and clarity, to increase recognition of the FSC brand. The target audience is the general public. Change can only confuse that audience. Most of this audience will not notice, but those who do may question why the changes are necessary, and what the changes mean. The brand will become unfamiliar. Some may begin to question FSC's credibility. The "well informed parties" should be informed enough to interpret the current situation, or have the skills to dig deeper if they must.</p> <p>For comparison: The Trademark "United Nations" or "UN", is instantly recognized. That organization does not subdivide its trademark, even though it has a multitude of departments and functions. "UN" carries a certain message. It's simple, and everybody understands. The UN does not need its' brand to evolve.</p> <p>The current situation of FSC trademark use is simple. 100% is all certified material; Mix is all product that is vetted through the FSC Standards, and supports responsible forestry; Recycle is just that. With very little explanation, an uninformed party will understand.</p> <p>The new proposals make trademarks more complicated. More choices in labelling require more information to interpret. As presented, the interpretations are unclear. (see above comments). Where is the value added, if the goal is to promote the brand?</p> <p>Finally, and importantly, the benefits of changing trademarks should be weighed against the cost of implementing change.</p> <p>My company estimates that a trademark /label change costs about \$50,000 to implement. That cost includes time, labor, computer programming, making corrections etc.</p> <p>Even using a more conservative number, \$20,000 average for 30,866 current COC certificate holders, implementation would total millions of dollars:  \$20,000/CH x 30,866 CHs = \$61,732,000 (US\$)</p> <p>Strategic Plan Critical result area 1.1, Success Criteria 1.1.1 states "Policies and Standards are aligned with strategy, are outcome based, incorporate market implications, and are analysed for cost implications..."</p> <p>Please review the cost implications of the proposed changes on Certificate holders, Certifying Bodies and FSC staffing levels."</p>
Entire document	G	<p>The general community does not understand that there are differing levels of FSC claims. Generally they are satisfied that the product they are purchasing is responsibly sourced. If you have astute consumers, who wish to find out more, a reference to the website would be a great idea (similar to option A.3). I don't think it is necessary to clarify the use of materials (especially in the case of FSC Mix) in the FSC on-product label. This website could also have links to other products/suppliers that sell FSC Certified products.</p>
Entire document	G	<p>On a side note: Labels are still used by many, at a CoC level to identify certified products and apply physical separation. Although, one label would be easy, it may cause issues for companies that do not have a sophisticated system for determining product selection at a site level. Assistance may be required to companies moving forward to assist in developing another avenue for product verification.</p>
Entire document	G	<p>If you want FSC and RA public awareness Just let stakeholders use downloadable eps FSC logo file wherever whenever dimmed ethically and morally suitable.</p>
Entire document	G	<p>we prefer to retain the current labelling system or alternatively retain the same labels with a change in text for FSC Mix label "From responsible sources"</p>
Entire document	G	<p>Some companies attending FSC Denmark's information meeting thinks this discussion is brought up because of political reasons and don't think it has relevance to the end-users when the buy certified materials and look for the product labels. These companies don't really have a strong opinion in this discussion or have a preference for any of the models. So they are not explicit demanding a change in the FSC labels. Please see Model B comment below for a comment to this proposed model.</p>
Entire document	G	<p>I do not support the idea of getting rid of the three FSC labels what makes the clear differentiation from the other certification scheme and has the advantage to clearly inform what's behind each label (admitting it needs to be clearer for the mix label). I strongly believe that the three labels are part of our brand and renown, and loosening this would not serve FSC' image. I know that might not be of real impact (yet) for the end consumer who still needs to learn more about FSC subtleties, but I do believe it's of great value for stakeholders both in terms of visibility and image of engagement.</p> <p>Finally, I don't think that would make things so much easier for printers, who got used to the three labels, and who are far more seeking for better compromises regarding the size and placement of the label on the products than the model of the label to be used.</p>

Entire document	G	<p>I vote for option A.</p> <p>Reason: Option B is simple but causes a lot of problems for current products such as:</p> <ul style="list-style-type: none"> <li>-FSC should always promote FSC certified materials prior to controlled materials. Reducing the variation of 3 labels into one somehow implies that FSC itself does not distinguish FSC Certified materials from controlled materials anymore. This is a risk to the system.</li> <li>-A lot of companies and consumers in certain market have preferences on recycled products. For them, recycled label is what to look for (could possibly solve by Moebius loop in the label but it is less clearer than “recycled” word).</li> <li>-For the above reason, CHs have been making huge effort to source everything with reclaimed materials so that they can apply recycled labels on their products.</li> <li>-Simplifying the rules to make labelling easier can be achieved by the revised standard. Many restrictions are now removed which will make it easier to label products.</li> </ul>
Entire document	G	<p>Should the revision of FSC-STD-40-004 take into account the proposal to move to a single label (although this would mean a delay in its approval/publication)? To have the two standards out of alignment is likely to cause confusion.</p>
Entire document		<p>A study is recommended, if not requested, that investigates how the product labels need to be designed and which content they should have in order to respond to the consumers perspective. Through this the essential details could be identified (Size, text, color etc.) that is needed to label products.</p>
Entire document	G	<p>The approach to develop the basic versions of the product labels through the consultation of a discussion paper is rejected. A well-thought approach would be to compare different product labelling schemes and/or to elaborate a study that develops the labelling based on the consumer perspective. Firstly a concept is needed that focusses the claim/statement/promise in relation to product labelling – the technical details how to implement the solution and how to define rules can be developed as second step. Companies have declared their willingness to support such an approach and contribute with their knowledge and expertise. Less academic, more consumer-orientated communication through the label is needed.</p>
Entire document	G	<p>Decisions to change the labels should be supported by a cost-benefit-analysis: Which costs will occur for the CH if the layout is changed and which benefits will be generated for the consumer. For instance in relation to a changed text from „from responsible sources“ to „supporting responsible forestry“. If a different layout should be necessary, an timewise unlimited protection of existing stock, at least until the next regular, or otherwise justified, change of packaging layout or of printing plates.</p>
Entire document	T, G	<p>Option (A) VS. option (B)</p> <ul style="list-style-type: none"> <li>- 25 stakeholders (out of 39 voting stakeholders) expressed their preference for Option (A)</li> <li>- 10 stakeholders (out of 39 voting stakeholders) expressed their preference for Option (B)</li> <li>- 4 stakeholders (out of 39 voting stakeholders) abstained from expressing their preference</li> </ul> <p>Suggested text</p> <ul style="list-style-type: none"> <li>- All stakeholders preferring Option A expressed their preference for textual options A.1 and A.2, with a slight higher (not really significant) preference for A.1.</li> <li>- All stakeholders preferring Option B clearly expressed their preference for textual option B.3</li> </ul> <p>Rationale</p> <ul style="list-style-type: none"> <li>- Stakeholders preferring Option (A) particularly highlighted that: <ul style="list-style-type: none"> <li>o This option would be a basic prosecution of the current situation, thus avoiding a dramatic change in all the existing labels.</li> <li>o It is very important to give continuity to the system, both for CHs and consumers. A relevant change in labelling requirements has already occurred in the past (e.g. “Pure” and “Mixed Sources” became “100%” and “Mix”).</li> <li>o Consumers need to be “educated” on the FSC scheme and on the recognition of its trademarks. To this point, recent survey show encouraging results, and it’s not time to give up through this change. Some Questions &amp;Answers released after a recent webinar (January 13th, 2016) on the FSC® Trademark Use Requirements Revision support this perspective. In fact, they contain this statement: “FSC is also increasing consumer communication to help explain the meaning of FSC and the label, so in the future part of the information would be transmitted through other channels as well.”</li> <li>o In order to “simplify” the message and to make it easily understandable by everyone, Forests for All Forever trademarks will help: thus, it’s not necessary to further simplify also the product label elements (already done through proposed Clause 3.4).</li> <li>o Technical aspects are important and they do not contrast with the brand strategy. In any case, the difference between “100%”, “Mix” and “Recycled” is intuitive also from the consumer’s point of view.</li> <li>o 100% products would be discouraged, as no difference with FSC Mix or FSC Recycled product would be clearly detectable by consumers. The idea of highlighting the different categories through different optional texts is totally utopic.</li> <li>o General texts in B have no salience at all.</li> </ul> </li> <li>- Stakeholders preferring Option (B) particularly highlighted that this option would simplify the labelling options, also through the lens of the final consumer.</li> </ul> <p>Other remarks</p> <ul style="list-style-type: none"> <li>- We, FSC Italy NO staff, strongly prefer Option A.</li> <li>- A request has been collected by one CH, i.e. to specify that, if labelling options will be changed, no selling constraints will be experienced by labelled products that will have been already produced with previous label versions/options.</li> </ul>
Entire document	G	<p>Our overarching concern is that the proposed revision to FSC-STD-50-001 v2 does not appear to have been adequately cross-walked with FSC’s newly approved Global Strategy. Now that implementation of this strategy is underway, we strongly encourage an assessment of the proposed standard with relevant critical result areas, particularly sections 1.1, 2.1 and 2.2. Most importantly,</p>

		<p>changes to FSC's on product labelling requirements should derive from robust internal research into the potential impacts on FSC's market share and awareness ambitions. We highly encourage that final decisions on this standard revision be postponed until the Global Strategy implementation work related to critical result areas 2.1 and 2.2 are completed. This work will help provide initial direction for FSC global marketing strategy, and ideally this work would influence FSC's medium and long-term approach to product labelling.</p> <p>Additional comments:</p> <p>US Federal Trade Commission: The United States Federal Trade Commission, or FTC, is an "independent government agency that promotes consumer protection and prevents anticompetitive business practices." The FTC recently revised its Green Guides that control the use of certifications and seals of approval related to environmental claims in the US. The guidelines help marketers avoid making environmental claims that are unfair or deceptive. In September of 2015, the FTC sent warning letters to five groups that offer environmental certifications and 32 businesses that display these labels. These letters and two press releases from the FTC can also be found attached. The FTC takes any complaints about the Green Guides seriously. It is imperative that, FSC clarify how our standards address the FTC guidance. FSC US has carried out a preliminary assessment of the draft Trademark Standard related to the FTC Green Guides. The crosswalk with the US comments, along with the full text of the FTC Green Guides, can be found attached to the comment submission. FSC US' preliminary analysis indicates that the first draft of the revised trademark standard adequately addresses many of the FTC guidelines. However, there is potential risk of violation of the FTC Green Guides with the use of the mini label due to the lack of information contained on this label. These areas are noted in the attached crosswalk.</p> <p>Mini Label: Many US stakeholders are pleased to see a proposed relaxing of restrictions on use of the mini label. FSC US may be supportive of allowing this flexibility. however, we strongly encourage and would like to participate in an analysis considering the impacts that FSC might expect from such a change. This research should examine whether the change will result in an increase the number of companies that label as well as the overall volume of labelling. If both of the above hypotheses are proved true, then we have to answer the question of whether the net impact of increased use of a less prominent label will be positive for FSC? We believe this analysis is crucial before finalizing the revision to FSC-STD-50-001 v2.</p>
Entire Document	G	<p>Leave the on-product labels as is. Or, allowing the Mini label versions, Product Type and Claim, is sufficient. If you add too much language, the printers/graphic designers aren't going to use the labels. I think the best suggestion, to avoid frustration and dropping of FSC by active CHs is to keep the current labels, allow the minis all the time, and provide CHs with additional text that can be placed outside the labels if they want to clarify the inputs 'i.e. 'This product is manufactured from fibers that come from well-managed forests and other responsible sources' etc. Most consumers aren't going to understand the difference between Mix, 100% or Recycled anyway (heck, half the printers don't even understand the difference between 100% and Recycled in the labels) so providing additional wording, as an option outside the label, would be beneficial.</p>
Entire Document	G	<p>Making changes to trade marks like this causes immense disruption. There are time, money and resource implications making brands less keen to keep the trade mark on pack</p> <p>The implications for write off and waste are increased. Hard changes to anything on pack force waste, especially slow moving, niche products. Soft changes with hard end dates i.e. "Packaging must be changed by XXXX, with a period of YYYY to consume stock" – such as the recent legally FSC changes, still, inevitably generate waste. This seems to go against everything that FSC stands for</p> <p>Our company is currently redesigning, a soft change with no hard end date. Soft changes with no hard end date are the only way to truly limit write off and waste.</p> <p>The prospect of being forced to change the FSC logo after our redesign (which is being signed off as we speak) will most likely end in us removing the FSC logo from pack completely.</p> <p>The FSC logo has been on our sugar and flour packs for around a year, not long and the likelihood is that we will have to change it. This discourages trade mark use and ultimately could affect participation.</p> <p>Although it could be too late for the Silver Spoon brand and the trademark is most likely to be removed. I would encourage caution around enforced trade mark change for the reasons stated above.</p>
Entire Document	T	<p>To further simplify, I would remove the disclaimer sentences and just have FSC 10%, FSC Mix and FSC Recycled labels without any text. Education on what the labels represent can be made available through FSC promotional material and the website. Consumers don't care about the details, they just want to see the FSC Label. Those folks that want more detail can access it through FSC.</p>
Entire Document	G	<p>Keep the labels you have, they are well-structured and easy to understand</p>
Entire Document	G	<p>Do not change anything. It is easier to get information from the current labels about the material / wood. Everybody understands the labels as they are now</p>
Entire Document	G	<p>I would keep the original. Because of the headline (100%, Mix, Recycled) it is easy to see what kind of wood is used. However the original "Mix" label is not easy to understand so I would combine the original and option A.</p>
Entire Document	G	<p>Keeping the original labels will maintain recognizability for people who already know it. Maybe you should start a campaign to inform the world better of the labels that already exist and therefore improve recognizability.</p>
Entire Document	G	<p>The labels are good as they are now. Only the MIX label should be written clearer. Both new options are useless because the extra information is voluntary and is not easily understandable.</p>
Entire Document	G, T, E	<p>Do not change the label. The only thing I would advise you to do is to leave out the number at the bottom of the label and put it under the label. This way it is easier to recognize the label and no</p>

		information gets lost. Also, the line above the product number, where the little explanation is, should be left out. But when the two last lines are not there, there has to be a difference in the style of the letters of FSC and MIX/100%/RECYCLED. Also, put the website (ww.fsc.org) which is now under the label, below the label name. Just place this information next to the label or in another place of the packaging.
Entire Document	G	<p>The American Forest &amp; Paper Association (AF&amp;PA) supports allowing organizations to continuing using the current FSC “MIX” label. Given the proposed options, it seems that neither Model A (three labels) nor Model B (one label) provide substantive improvements over the current situation that are noticeably different to the average consumer. The proposed options appear to be very similar to the existing on-product “MIX” label and don’t provide benefits that outweigh the cost and time associated with implementing a change. As an alternative to Models A and B, we recommend adding a Model C: No change to the current situation. FSC should realize that even the smallest change to an existing logo or labelling requirement can result in a significant burden for certificate holders to implement across many facilities and operating divisions. We believe the cost is simply too huge for such a small improvement (certificate holders will bear the entire cost burden of making any changes to labels). If FSC proceeds with the label changes, the likely outcome is that producers will simply block out the logos and stop using FSC labels on packaging.</p>