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Title: **FSC on-product labeling requirements**

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Foreword

This standard specifies the requirements for the correct on-product use of the FSC label and related claims by certificate holders.

It constitutes the basis for evaluation and approval of FSC label use on product by FSC accredited certification bodies.

All aspects of this standard are considered to be normative, including the scope, standard effective date, references, terms and definitions, tables and annexes, unless otherwise stated.

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A Scope

This standard is for FSC-certified companies who wish to use the FSC label on product. It specifies the requirements for the correct on-product use of FSC labels and associated claims.

It constitutes the basis for evaluation and approval of FSC label use on product by FSC accredited certification bodies.

B Standards effective date

The standard is effective 1st October 2004.

All existing and new chain of custody certificate holders wishing to apply the FSC label on-product shall comply with this standard from 1 July 2005.

This standard is mandatory for certified companies in compliance with *FSC-STD-40-004 FSC chain of custody standard for companies supplying and manufacturing FSC-certified products* if they wish to label products as FSC-certified.

This standard shall also be used by certificate holders using the new labels, certified against the FSC Policy on Percentage Based Claims (May 2000), except for sections 1.2, 4.1, 4.8 to 4.11, in accordance with the timelines and guidance provided by FSC¹.

C References

FSC-STD-40-004 *FSC chain of custody standard for companies supplying and manufacturing FSC-certified products*.

ISO Standard 14021 *Environmental Labels and Declarations – self-declared environmental claims (type II environmental labeling)* (1999).

FSC Trademark Policy Manual (Sept 2001)

MCU-POL-80-001 *Use of the FSC label together with non-FSC label* (December 2003).

Proposed timeline for phase in of new FSC standards for chain of custody and labeling (30 August 2004).

FSC-GUI-40-201 *“Guidance on the implementation of FSC-STD-40-201 FSC on-product labeling requirements”*.

FSC-POL-20-001 *“Group certification guidelines for forest management”*

FSC Policy on Group Chain of Custody (CoC) Certification: FSC Guidelines for Certification Bodies.

FSC Accreditation Manual (February 2002).

¹ See document *“Proposed timeline for phase in of new FSC standards for chain of custody and labeling”* (30 August 2004) and FSC-GUI-40-201 *“Guidance on the implementation of FSC-STD-40-201 FSC on-product labeling requirements”*

D Terms and definitions

Terms and definitions are provided in FSC-STD-01-002 *FSC glossary of terms*. Key definitions relating to this standard are underlined and are provided in Annex 1.

1 General requirements for the use of the FSC label on product.

FSC Certificate Holders

- 1.1 In order to use the FSC label on product, the company shall first be in possession of a valid FSC chain of custody or joint forest management and chain of custody certificate issued by an FSC accredited certification body.²

Product groups eligible to carry the FSC label.

- 1.2 FSC labels shall only be used on product groups which are eligible for the specified label, and as listed on the company's FSC product group schedule³.

Authorizing bodies and authorized label designs.

- 1.3 On confirmation of certification, FSC accredited certification bodies shall issue a brand pack to certificate holders.

Note: Brand packs will contain all graphic requirements, FSC Product Labeling Guide and electronic designs of the FSC labels along with the company registration code.

- 1.4 Companies shall reproduce the FSC label using their correct certification code number on the space specified in the graphic design of the FSC label (See Annex 3 to this standard).

- 1.5 Certificate holders shall obtain approval for the first reproductions of the FSC label that has been indicated by the FSC accredited certification body.⁴

Note: Companies using the correct label as provided in the brand pack may not need approval of the FSC label design every time it is applied as long as the FSC accredited certification body feels confident that the certificate holder is using the right label, except in cases listed in section 1.6 of this standard.

- 1.6 Companies shall seek advice and approval from the FSC accredited certification body about special labeling considerations (e.g. use of the FSC label with other non-FSC labels or trademarks, variations to the label, small spaces, etc.) outlined in this standard.

- 1.7 Modifications to the label designs are not permitted. In exceptional circumstances the company shall obtain approval for any variation to the label designs from their accredited certification body prior to final printing and use of labels. Variations other than those approved in the FSC Product Labeling Guide and in this standard shall be referred by FSC accredited certification bodies to FSC International Center for approval.

- 1.8 In exceptional circumstances, (e.g. due to the size of the product), where the application of the FSC standard label at a minimum size is not possible either on the packaging or on the product, the company shall request authorization from the FSC accredited certification body to label the product with the following elements:

² FSC certificates are granted by FSC accredited certification bodies through contractual agreements with certificate holders.

³ FSC-STD-40-004 *FSC chain of custody standard for companies supplying and manufacturing FSC-certified products.*

⁴ According to the file number assigned to the specific FSC label in the brand pack.

- a. FSC logo
- b. Label title
- c. abbreviated copyright claim
- d. certification code number.

Note:

(ii) When the size of the product does not even permit the use of the above elements, FSC will consider as minimum elements the FSC logo, the label title and the certification code number.

(i) This exceptional situation shall be well justified by the certificate holder. FSC accredited certification bodies shall inform FSC about the approval request and the type of product on which it will be used before granting final approval.

- 1.9 If a company wishes to apply the FSC label directly on the product (e.g. brass plaques, heat brands, etc.), a second label shall be applied employing the standard label designs outlined in this standard (e.g. as a hang-tag or sticker). Both labels shall be submitted for approval to the FSC accredited certification body.
- 1.10 The company shall keep all the records of the certification body's approvals.

FSC label use on-product together with other non FSC label or labels.

- 1.11 The FSC labels shall not be used on-product together with the logos, names or other identifying marks of other forest management conformity assessment schemes.⁵

Note: There may be cases where certification schemes, have labeling arrangements with FSC, such schemes are specified in Annex 2 to this standard.

- 1.12 The FSC label may be used on product together with certification bodies' logos. If both logos appear on a product, the FSC logo shall be visible enough to avoid confusion with respect to other certification bodies' programs.

Additional on product claims using the FSC label

- 1.13 Products carrying the FSC labels shall not carry additional on-product claims referring to the sustainability of the forest from which the wood/fiber in the product is sourced.⁶

⁵ MCU-POL-80-001 FSC and non-FSC Label.

⁶ As this does not comply with ISO requirements. "The concepts involved in sustainability are highly complex and still under study. At this time there are no definitive methods for measuring sustainability or confirming its accomplishment. Therefore, no claim of achieving sustainability shall be made" (ISO 14021 (1999) paragraph 5.5).

Visibility and placement of the FSC label

- 1.14 Labels shall be directly applied to the certified product or its sale packaging or both in form of tag, label, sticker, etc. In all cases certified companies shall ensure the FSC label is clearly visible on the product.

Note: FSC strongly recommends certified companies use the FSC label on the products which are likely to be sold or offered without packaging by non-certificate holders to end consumers, in order to permit un-certified companies to promote such products as FSC certified.⁷

- 1.15 Whenever the FSC label is used on products where there is likely to be confusion between the FSC-certified product and other non-FSC-certified products, an extra visible claim shall be used to state clearly which the certified product is (e.g. FSC label on certified packaging used to wrap non-certified wood or paper products, FSC label used on products comprised with FSC certified content and non-wood fiber or agricultural fiber). The FSC label shall not be applied on the non-certified element of the product. These cases require prior approval from the respective FSC accredited certification body.

2 Categories of the FSC label

- 2.1 There are three categories of FSC labels⁸ and five possible variations of the on-product claim.

- | | |
|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a. FSC- <u>pure</u> label: | Product groups manufactured with 100 % FSC-certified material. |
| b. FSC- <u>mixed</u> label ⁹ : | variation i. Mixed sources: Product groups from well managed forests and other controlled sources.

variation ii. Mixed sources: Product groups from well managed forests, controlled sources and recycled wood or fiber.

variation iii. Mixed sources: Product groups from well managed forests and recycled wood or fiber. |
| c. FSC- <u>recycled</u> label: | Product groups manufactured with 100% recycled content. |

Note: Each type of label has a specific design, graphic and wording elements that differentiate one from another and which will determine the standards behind the promise of the label.

- 2.2 Companies using the FSC label for segregation of certified from uncertified material during manufacturing process or storage are not required to use the

⁷ Non-certified companies, such as retailers, selling finished FSC-certified products to end-users may be authorized to use the FSC trademarks to promote FSC certified products, with the condition that the advertised and exposed products are FSC labelled by the certified supplier or certified manufacturer.

⁸ Pure, mixed and recycled are working titles only. See requirements outlined in FSC-STD-40-004

⁹ In the case of the mixed label using recycled content, the option is provided to include an approved recycled symbol. Approved recycled symbols are listed in Annex 4 to this standard.

labels described in 2.1 above. Marks segregating certified from uncertified materials shall not reach final points of sale, shall not replace the FSC label and shall not be interpreted as commercial labels.

- 2.3 Translation of labels may be approved by accredited certification bodies on a case by case basis, prior discussion with the respective National Initiative in the country and FSC International Center.
- 2.4 The specific design of the FSC label may be used together with extra elements¹⁰ in one label application (e.g. sticker, hang-tag, etc.). The extra elements shall not modify, interfere or be confused with the FSC label design provided in the brand-pack.

3 General graphic requirements applicable to the labels.

- 3.1 The FSC label shall contain the following elements in the order established in the electronic designs of the label (See Annex 3, label designs):
 - a. FSC logo¹¹
 - b. Copyright claim
 - c. Label title (based on product type)
 - d. Correct chain of custody or joint forest management and chain of custody certificate registration code issued by the company's FSC-accredited certification body
 - e. Standard claim according to the type of label
 - f. FSC webpage address

Format, size and color of the FSC labels:

- 3.2 On product labels shall be either square or landscape format, as delivered in the brand pack.
- 3.3 The electronic designs provided to certificate holders within the FSC brand pack will be subject for reproduction in different size scales that can be used for adapting the label to different product sizes.¹²
- 3.4 FSC labels shall be reproduced using the following color options¹³:
 - a. Negative-full color (dark background) or
 - b. Positive-full color (light background) or
 - c. Positive-one color (black and white)

4 Specific requirements for the category of labels.

FSC-pure label

- 4.1 Product groups carrying the FSC-pure label shall be in compliance with the minimum requirements established in the FSC-STD-40-004 "FSC chain of custody

¹⁰ Code bars, product name, name and logo of the certificate holder, extra FSC information, etc.

¹¹ The FSC logo is comprised of the FSC initials, the tick mark and the copyright symbol

¹² The minimum size shall be respected in such scales in compliance with the FSC Product Labeling Guide.

¹³ Details about how to use the electronic designs of the FSC labels, scale sizes, colors, etc. are included in the FSC Product Labeling Guide.

standard for companies supplying and manufacturing FSC-certified products”
section 12.2.

- 4.2 All on-product uses of the FSC-pure label shall be in compliance with the general graphic requirements indicated in section 3 of this standard.
- 4.3 The label title of the FSC-pure label shall read “100%”.
- 4.4 The claim used on the FSC-pure label shall read “From well-managed forests”.

FSC-mixed labels

- 4.5 The label title of the FSC-mixed labels shall read “Mixed Sources”.
- 4.6 The claims used on the FSC-mixed labels shall be in accordance with the variations established in section 2.1 i, ii and iii of this standard and shall read:
 - a. “Product group from well-managed forests and other controlled sources” or
 - b. “Product group from well-managed forests, controlled sources and recycled wood or fiber“
 - c. “Product group from well-managed forests and recycled wood or fiber”
- 4.7 For each of the above claims, the design of the FSC-mixed labels shall follow the requirements established in section 3 of this standard.
- 4.8 Product groups with FSC (pure or mixed) and controlled sources, without recycled content, manufactured in compliance with the requirements for labeling with the FSC-mixed label established in the FSC-STD-40-004 “*FSC chain of custody standard for companies supplying and manufacturing FSC-certified products*”, shall use variation i of the mixed label presented in section 2.1 of this standard.
- 4.9 Products manufactured with FSC material (pure or mixed), recycled material, and material from controlled sources, in compliance with the requirements for labeling with the FSC-mixed label established in the FSC-STD-40-004 “*FSC chain of custody standard for companies supplying and manufacturing FSC-certified products*”, shall use the FSC-mixed label variation ii. Approved recycled symbols may be used with this option. See annex 4 to this standard.
- 4.10 Products manufactured with FSC material (pure) and recycled material, in compliance with the requirements for labeling with the FSC-mixed label established in the FSC-STD-40-004 “*FSC chain of custody standard for companies supplying and manufacturing FSC-certified products*”, shall use the FSC-mixed label variation iii. The company will have the option to use an approved recycled symbols. See annex 4 to this standard.

FSC-recycled label

- 4.11 Product groups carrying the FSC-recycled label shall be in compliance with the minimum requirements established in the FSC-STD-40-004 “*FSC chain of custody standard for companies supplying and manufacturing FSC-certified products*” section 12.6.
- 4.12 All on-product uses of the FSC-recycled label shall be in compliance with the general graphic requirements indicated in section 3 of this standard.

- 4.13 The label title of the FSC-recycled label shall read “Recycled”
- 4.14 The claim used on the FSC-recycled label shall read “Supporting responsible use of forest resources”.
- 4.15 The “mobius loop” logo shall be used together with the FSC Logo with the percentage of the post-consumer recycled content of 100%. It shall read “100%”.

5 Other considerations

Arrangements for printing and applying labels between certificate holders.

- 5.1 Certified buyers requesting certified manufacturers to label products with the buyers' certification code number:
- a. Both, the buyer and manufacturer shall inform their certification body about the request.
 - b. Both companies shall obtain written and signed authorization from their certification bodies for the labeling arrangement.
 - c. The manufacturer's certification body shall be responsible for the final approval of the product label and for assuring that the buyer's code only appears on those products that are supplied to the buyer.
 - d. The manufacturer shall keep the data relating to the use of client-specific labels separately or readily available for the FSC accredited certification body or FSC's review.
 - e. The buyer shall make background information available for all affiliate group companies (if any) selling the products with the buyer's code about the specific arrangements regarding the use of his FSC code on the product.

Note: Labeling arrangements are not allowed when the next FSC certified link in the FSC chain of custody (e.g. buyer) intends to label products using the code of the previous FSC certified link (e.g. manufacturer, supplier).¹⁴

Arrangements for printing and applying labels between certificate holders and non-certificate holders.

- 5.2 Non-certified companies requesting certificate holders to label FSC products with their brand name.
- a. Certificate holders shall inform their certification body about the labeling proposal.
 - b. FSC accredited certification bodies shall evaluate the proposal for the labeling arrangement and label design.
 - c. The application of the FSC label shall be performed by the certificate holder, with previous approval from the FSC accredited certification body.
 - d. Certificate holders shall follow the requirements for labeling established in this standard.
 - e. FSC accredited certification bodies and certificate holders shall keep record of the approval granted for the labeling arrangements.

¹⁴ FSC considers this practice is not in compliance with part 3.6, principle 4, section 4.3 of the FSC Accreditation Manual. The practice is also risky in terms of trademark use and control of labels.

Note: Non-certificate holders are not allowed to apply the FSC label. FSC identification codes issued to non-certificate holders by FSC international or the respective FSC nominated agent, shall not be used on product labels.

Group FSC certificates

- 5.3 FSC certified group entities shall obtain a brand pack for the reproduction of the FSC labels in accordance with this standard.. The group entity remains responsible for the use of the FSC brand pack and FSC label by the certified members of the group.

Note: Group entities shall ensure that only members covered by the FSC certificate are using the FSC label in compliance with this standard.¹⁵

¹⁵ Relevant regulations for the use of the FSC trademarks by group entities and members of the group is regulated by the “FSC Policy on Group Chain of Custody (CoC) Certification” and “FSC-POL-20-001 Group certification guidelines for forest management”.

Annex 1: Terms and Definitions

Chain of Custody. The path taken by raw materials, processed materials and products, from the forest to the consumer, including all successive stages of processing, transformation, manufacturing and distribution.

Controlled Wood. Wood/fiber which is identified by a company for the exclusion of “unacceptable” sources.

FSC-certified. A product, process or service that has been certified by an FSC-accredited certification body as being in compliance with an applicable FSC-endorsed standard.

FSC-mixed wood/fiber. Virgin wood/fiber which is linked to FSC-certified wood/fiber and which is sold as FSC-mixed by the holder of a valid FSC chain of custody or joint forest management and chain of custody certificate.

FSC product group schedule. The list of all FSC product groups that the company wishes to be included within the scope of its FSC chain of custody certificate.

FSC-pure wood/fiber. Virgin or fiber wood which originates from an FSC-certified forest and is sold as “Pure wood/fiber” by the holder of a valid FSC chain of custody or joint forest management and chain of custody certificate.

Group entity, The entity that applies for group certification and holds any group certificate that is issued. The group entity may be an individual person, a cooperative body, an association, or other similar legal entity.

Off-product. Term applied to all statements, claims, label and such like used to promote products, companies or organizations, but which are not physically attached or applied to a product itself.

On-product. Term applied to any label, packaging or marking attached or applied to a product. Examples of on-product labels or marks include product tags, stencils, heat brands, retail packaging for small loose product (such as pencils), protective packaging and plastic wrap.

Post-consumer reclaimed wood/fiber. Wood and/or fiber that is reclaimed from a product after that product has been used for its intended end-use purpose by individuals or business, and has reached the end of its useful life for that end-use. The category does not include over-issue publications, printers’ scarp, or other sources which are part of the value-added or retail process.

Recycled material. Material that has been reprocessed from reclaimed material by means of a manufacturing process and incorporated into a final product.

Annex 2: list of certification schemes whose requirements meet or exceed those of the Forest Stewardship Council

Under the terms of the Memorandum of Understanding signed between FSC and LEI, as of date, no forest may be issued with a LEI certificate until and unless an FSC-certificate has also been issued. Under the terms of this Memorandum of Understanding products may therefore be labeled with both the FSC and the LEI labels.

Other certification schemes that wish to be eligible for joint labeling with the FSC scheme should contact the FSC International Center for consideration and discussion.

Annex 3: Examples of FSC on product labels

Note: This does not constitute the complete package of labels. A complete package will be included in the FSC brand pack.



Annex 4: Approved recycled symbols.

1) Mobius loop with percentage of post consumer recycled content specified within the symbol as per examples below:

