

EMPOWERING CONSUMERS DIRECTIVE FAQ
– CERTIFICATE HOLDERS

SUMMARY HIGHLIGHTS

What are the major changes introduced in FSC-STD-50-001 V3 for Empowering Consumers Directive (EmpCo) alignment?

There are three categories of changes introduced to ensure alignment with EmpCo:

1. Phase out of the FFAF mark for all FSC licence holders, in both on product and promotional use.
2. Changes to the FSC on-product label:
 - fsc.org website is mandatory;
 - Product type is mandatory in all situations; multiple product types possible;
 - Additional statement is required if the product type cannot sufficiently clarify which FSC-certified material the label refers to.
3. Changes to promotional use of FSC trademarks:
 - fsc.org website is mandatory together with the promotional statement;
 - FSC-STD-50-001 addendum to include promotional statement examples and requirements for making promotional statements

FFAF PHASE OUT

When is the FFAF mark phase out effective?

We encourage all licence holders which use the FFAF mark on products or in any kind of communication (digital or print) on the EU market to remove it by **September 2026**. In addition to this legislative deadline, all CHs must transition to V3 of FSC-STD-50-001 by January 2029 at the latest.

What is the difference between the FSC normative transition timeline and the EmpCo compliance timeline?

FSC's normative transition timeline refers to the timeline set by FSC for its licence holders to transition to a new normative or guidance document. The transition is relevant for conformance with the FSC system. The deadline is set by FSC and generally ranges from 18 months upwards.

The EmpCo alignment timeline refers to the legislative deadline by which adjustments must be made to comply with EmpCo requirements. It is set by the European Union and will be enforced by member states. This deadline is September 2026.

You can achieve legislative alignment without transitioning to the updated FSC-STD-50-001, by following FSC's EmpCo alignment guide to help you prepare for September 2026. You then have until January 2029 to transition to V3 of FSC-STD-50-001.

Do I need to transition to FSC-STD-50-001 V3 to align with EmpCo requirements?

No, you can make the required changes without officially transitioning to V3, as FSC-STD-50-001 V2-1 already allows all the proposed modifications. Follow the EmpCo alignment quick guide to help you get an overview of your immediate actions. All artwork must be submitted for trademark approval, in line with FSC-STD-50-001 requirements.

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

The FFAF marks will remain available until January 2029 when the transition period for FSC-STD-50-001 V3 ends. Certificate holders which are still using FSC-STD-50-001 V2-1 require access to all the trademarks available to them, as defined in V2-1. To ensure that deadlines for EmpCo alignment and FSC-STD-50-001 V3 conformity remain top of mind, Brand Hub will be updated in 2026 with pop-ups, disclaimers and similar.

FFAF PHASE OUT – STOCKS, MISUSE, DEROGATION

What will be the rules around existing stock with the FFAF mark?

All products placed on the EU market or promoted on the EU market are expected to be compliant from September 2026, including stocks. However, The EU Commission has not pronounced itself specifically about what occurs with existing stocks, and this clarification is based on that absence of information, but without prejudice of further FAQ or comms that the EU may publish in the future.

If selling or promoting FSC-certified products with the FFAF mark on the EU market, please cover or remove the FFAF mark by September 2026.

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

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

Usage of FFAF past the FSC normative transition timeline (1 January 2029) will be handled as a misuse by FSC, through the usual process.

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

Will FSC consider a longer transition period?

FSC certificate holders have 3 years from FSC-STD-50-001 V3 publication until the normative transition deadline (while the first 6 months before the standard is effective cannot be used for transitioning, they can be used to prepare for this transition). This extended transition period has been adopted to allow certificate holders sufficient time for all changes and already deviates from the standard transition period of 18 months.

TOOL UPDATES – FSC BRAND HUB

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

The FFAF mark will remain available until January 2029, the end of the transition period for FSC-STD-50-001 V3. Certificate holders which are still using FSC-STD-50-001 V2-1 require access to all the FSC trademarks available to them, as defined in V2-1. To ensure that deadlines for EmpCo alignment and FSC-STD-50-001 V3 conformity remain top of mind, FSC Brand Hub will be updated with pop-ups, disclaimers and similar.