

SUMMARY HIGHLIGHTS

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

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

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

FFAF PHASE OUT – TIMELINE

When is the FFAF mark phase out effective?

We encourage all licence holders which use the FFAF mark on products or in any kind of communication (digital or print) on the EU market to remove it by **September 2026**, the effective date of the new FSC Trademark Use Guide for Promotional Licence Holders. If you are purchasing FSC-certified products that include the FFAF mark, this will have to be removed in line with the guidance provided.

FFAF PHASE OUT – STOCKS, MISUSE, DEROGATION

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

All products placed on the EU market or promoted on the EU market are expected to be compliant from September 2026, including stocks. 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 FSC-certified products with the FFAF mark that you have already purchased can be sold until stocks are exhausted. However, promotional materials including the FFAF mark approved under the FSC Trademark Use Guide for Promotional Licence Holders will have to be exhausted, updated or removed before September 2026.

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

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

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

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

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

PROMO PANEL PHASE OUT FOR PLHS – ALTERNATIVES

Will an alternative design be offered?

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

What alternatives do PLHs have?

PLHs can continue using the recognizable FSC logo. FSC will provide guidance how the FSC trademarks can be used when not in a promotional panel design. We will also be providing more assets for PLHs as part of the FSC Brand Hub.

TOOL UPDATES – FSC BRAND HUB

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

The FFAF mark will be removed in September 2026, when the new FSC Trademark Use Guide for Promotional Licence Holders becomes effective. To ensure that alignment with EmpCo remains top of mind, FSC Brand Hub will be updated with pop-ups, disclaimers and similar in Q1-Q2 2026.

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

The design will be removed in September 2026, when the new FSC Trademark Use Guide for Promotional Licence Holders becomes effective. To ensure that alignment with EmpCo remains top of mind, FSC Brand Hub will be updated with pop-ups, disclaimers and similar in Q1-Q2 2026.