

EMPOWERING CONSUMERS DIRECTIVE FAQ

– CERTIFICATE HOLDERS

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

SUMMARY HIGHLIGHTS

What are the major changes introduced 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-50-001a addendum to include promotional statement examples and requirements for making promotional statements

NOTE: Please keep in mind that any artwork update which modifies the FSC trademarks (e.g. adding the fsc.org website in promotional statements, updating your on-product label to include fsc.org etc.) is considered a new artwork and must be submitted for approval to your certification body (CB).

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. Stocks refer to any products or materials produced before September 2026 (EmpCo compliance deadline) or January 2029 (FSC-STD-50-001 transition deadline), whichever date is relevant according to your market of distribution.

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. Once you transition to FSC-STD-50-001 V3-0, you cannot produce new products or promotional materials using the FFAF mark.

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.

LABELLING

Are the FSC labels with updated mandatory elements already available?

Yes, the on-product labels with mandatory elements aligned with EmpCo and FSC-STD-50-001 V3-0 expectation are already available on FSC Brand Hub. The fsc.org address is currently marked as an optional element, so please ensure it remains ticked when configuring the label and downloading.

Why is the FSC website address a compulsory element in the FSC label?

The FSC website address is a compulsory element as the FSC label cannot communicate all essential information about the FSC certification process and related standards. To avoid adding new elements to the on-product label and to minimize impacts on certificate holders, FSC directs consumers to its website, where they can find clear, comprehensive, and user-friendly explanation of what is certified and the system behind it.

The FSC website provides key information about FSC's alignment with the requirements for certification schemes set by EmpCo, such as information about how to achieve certification, procedures for dealing with nonconformance with FSC requirements or information about the FSC system's standards and requirements. This improves transparency and closes the information gap that the on-product label cannot fill without this second layer of information.

Can I continue using the FSC on-product labels with the full label text?

Yes, the full label text ('From well-managed forests' for 100%, 'Supporting responsible forestry' for MIX, and 'Made from recycled material' for RECYCLED) remains available for use. It is an optional element and you may choose to include it or omit it.

When do I require a clarification statement in addition to the product type and why is this important for EmpCo?

EmpCo prohibits making environmental claims about the entire product when they only concern a certain aspect of the product. The "product type" therefore becomes an essential element in ensuring EmpCo alignment. However, there are situations in which the product type is insufficient by itself, and an additional clarification statement is required, to avoid consumer confusion. If your FSC-certified product has several components made with the same forest-based material but only some components are FSC-certified, then an additional statement is needed to clarify and specify to which part of the product the FSC label refers to.

For instance, printer paper sold in paper packaging are both made of paper. If only the printer paper is FSC-certified, then the product type 'Paper' in reference to the printer paper is misleading and

insufficient. This situation requires an additional statement, as a consumer might assume that the FSC label refers to both the printer paper and its paper packaging.

On the other hand, if only the paper packaging is certified, then the product type 'Packaging' would be sufficient, as it cannot lead the consumer to misinterpret the label as referring to the printer paper.

A clarification statement also wouldn't be needed if there are two labels present, one with product type 'Paper', one with the product type 'Packaging', as they would each indicate a separate product (or if using a label with multiple product types, which will be available in FSC Brand Hub by July 2026).

How do I determine whether a clarification statement is needed if my FSC-certified product is being combined with other products by the buyer?

In practice, various forest-based products may be combined together by the end seller, for instance an outer box packaging being combined with cardboard inserts as secondary packaging. The supplier of cardboard boxes may therefore be unable to properly assess whether an additional clarification statement is needed or if the product type on the label is sufficient.

There are two strategies which can help mitigate potential nonconformity with FSC-STD-05-001 V3-0 and noncompliance with EmpCo: 1) ask the buyer whether your product will be combined with others and adjust your labelling accordingly; 2) always include a clarification statement next to the label such as "This FSC label refers to the cardboard box".

Can I start using the FSC labels with multiple product types as soon as they become available on FSC Brand Hub or do I need to transition to FSC-STD-50-001 V3-0?

Yes, you may start using this new labelling option as soon as it's available on FSC Brand Hub. FSC-STD-50-001 V2-1 does not set any prohibitions around this.

Can I continue using the product type outside of the FSC on-product label, in line with FSC-STD-50-001 V2-1?

Until labels with multiple product types are available on FSC Brand Hub, including the multiple product types in a text outside the label is the only option available to certificate holders. You may continue to use this option until you transition to FSC-STD-50-001 V3-0. Once you transition to V3-0, you are required to include at least one product type name inside the label, while still being allowed to include other product types in an additional statement. This is because the label element product type is now mandatory in all situations.

What happens with product stocks which feature a label with a different configuration of elements?

Traders need to ensure that the FSC labels placed on the EU market comply with EmpCo requirements from September 2026, including for existing products. Where traders identify FSC labels which do not include all the recommended label elements, they will have practical options to ensure compliance for existing products. These may include covering or correcting them by stickering or adding supplementary information at the point of sale. Please note that updating your label artwork constitutes a new trademark use and must be approved by your CB.