

## EMPOWERING CONSUMERS DIRECTIVE FAQ – PROMOTIONAL LICENCE 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 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.

NOTE: Please keep in mind that any artwork update which modifies the FSC trademarks (e.g. removing the FSC promotional panel and including the mandatory elements for promotion as standalone) is considered a new artwork and must be submitted for approval to your Trademark Service Provider (TSP).

### 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.

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. Printed promotional materials including the FFAF mark approved under the FSC Trademark Use Guide for Promotional Licence Holders pre-June 2026 can be used until exhaustion of stock.

### **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**

### **What will be the rules around existing promotional material with the promotional panel design?**

Online materials should be updated to remove the promotional panel by latest September 2026. Existing printed promotional material stocks (e.g. product catalogue, leaflets, posters etc.) which use the promotional panel must be updated before September 2026 (reprint, sticker over the promotional panel, cover the promotional panel etc.). If the printed promotional materials are distributed outside the EU, you may use them until exhaustion of stocks.

### **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 June 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 June 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.

## **LABELLING**

### **What happens with product stocks which feature an FSC label with a different configuration of elements than the one provided in the alignment guide?**

All PLHs which place FSC-labelled products on the EU market need to ensure that the labels are in line with the FSC guidance for EmpCo alignment. An early assessment of your impacted products is essential to ensure that you'll be ready by September 2026. When you identify labels which do not include all the recommended label elements, you have three strategies:

1. Cover the labels. This removes the ability to promote the products as being FSC-certified.
2. If only missing the fsc.org address, you may add this information at the point of sale (in store or digital).
3. If feasible, ask your suppliers for corrections (e.g. stickering) before delivery.