



## Criteria for good labelling and assessment of proposed texts for FSC 'Mix' label

Many governmental offices and consumer agencies provide guidance and definitions for making good (environmental) claims and marketing. Typically, there are also authorities available to protect consumers by ensuring that marketing claims do not mislead them.

The guidance aims is to help consumers to make informed choices and to ensure a level playing field for businesses making good environmental claims (see: [http://ec.europa.eu/consumers/documents/consumer-summit-2013-mdec-report\\_en.pdf](http://ec.europa.eu/consumers/documents/consumer-summit-2013-mdec-report_en.pdf)).

The criteria provided to assess good claims usually include:

<b>Accuracy</b>	The claim can be substantiated and it is not made to convey a general environmental benefit It is clear whether it refers to the product, package, or service
<b>Not misleading</b>	Claim is not inconsistent or distracting, and does not overstate benefits
<b>Practicality</b>	Claim is concise enough, and does not include disincentives for use

The following analysis is based on these elements, although within one country or guide the exact wording of any particular criterion may be different, and additional criteria may be used. The practicality aspect is included to make sure the proposed text would be easy to use.

Examples of criteria:

<https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-issues-revised-green-guides/greenguides.pdf>

<https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html>



### FSC 'Mix' label and text options

The label text should be understood as part of the overall on-product label that already provides other information. The information presented on the label is shown in the chart below.

#### FSC label elements with proposed text options

	Logo*	Claim*	Specification*	Additional text explanation
(a)		Mix	Wood/Paper	From responsible sources
(b)		Mix	Wood/Paper	From certified and controlled sources
(c)		Mix	Wood/Paper	From certified, recycled, and/or controlled sources
(d)		Mix	Wood/Paper	From certified, uncertified, and/or recycled sources
(e)		Mix	Wood/Paper	Supporting responsible forestry
(f)		Mix	Wood/Paper	Supports the certification of responsible forest management
(g)		Mix	Wood/Paper	Responsible use of forest resources
(h)		Mix	Wood/Paper	(No text, only link to further information [URL or QR])

The following elements are also used:

- **FSC licence code\*** provides a unique code to identify the certificate holder so that details of the certificate holder and the scope of their certification can be found;
- **Website (URL)** is an optional element to direct to further information.

\* Compulsory elements (material specification not compulsory when all materials are covered by FSC certification).



**Analysis of the proposed texts against the selected criteria**

(a)

<b>Proposed text</b>	MIX Wood from responsible sources
<b>Accurate?</b>	The text is vague as it does not define 'responsible' or specify the types of sources used. It does, however, specify that the label refers to sourcing and, with the title 'Mix', to the fact that several sources are being used at the same time. It is not clear how to substantiate 'responsible'.
<b>Misleading?</b>	May be misleading if, by definition, only FSC-certified material may be called a responsible source and controlled wood is excluded. Does imply that all material used is accepted under the FSC system.
<b>Practicality?</b>	Short and easy to use.

(b)

<b>Proposed text:</b>	MIX Wood from certified and controlled sources
<b>Accurate?</b>	It is only accurate for products containing reclaimed material if the Moebius Loop is used to provide information on the use of recycled material. If the Moebius Loop is not used, it is not clear that recycled material may also be used. Can be substantiated.
<b>Misleading?</b>	Consumers do not understand the difference between 'certified' and 'controlled'. In fact, 29 per cent think that 'controlled' is a stronger due diligence system than 'certified' ('Consumer study on FSC label perceptions', B2B International, 2016). The use of the word 'certified' to refer to recycled material may incorrectly imply that the recycled material originates in FSC-certified forests.
<b>Practicality?</b>	Short and easy to include.

(c)

<b>Proposed text:</b>	MIX Wood from certified, recycled, and/or controlled sources
<b>Accurate?</b>	It is accurate according to FSC requirements. The claim can be substantiated.
<b>Misleading?</b>	It is not objectively misleading. However, clarity is reduced because the difference between 'certified' and 'controlled' is not intuitively clear for consumers. In fact, 29 per cent of respondents think that 'controlled' is a



	stronger due diligence system than 'certified' ('Consumer study on FSC label perceptions', B2B International, 2016).
<b>Practicality?</b>	The sentence is relatively long, listing materials that may or may not be included.

(d)

<b>Proposed text:</b>	MIX Wood from certified, uncertified, and/or recycled sources
<b>Accurate?</b>	The text is clear, but not entirely accurate because it does not credit actions of screening for all sources. The claim can be substantiated.
<b>Misleading?</b>	The text may be misleading, suggesting that FSC-certified material may be mixed with any material available.
<b>Practical?</b>	The sentence is relatively long, listing materials that may or may not be included. 'Uncertified' is a disincentive to use the text with the label.

(e)

<b>Proposed text:</b>	MIX Wood – Supporting responsible forestry
<b>Accurate?</b>	The text is vague as it does not specify <b>how</b> this product contributes to supporting responsible forestry. By sourcing? By donations? By something else? The title 'Mix' does not help to solve this problem. The claim can be substantiated.
<b>Misleading?</b>	Not misleading.
<b>Practicality?</b>	The current label text system may need to be changed somewhat to adjust removal of the connecting word "from" (such as "Wood from well-managed forests"). Relatively short and easy to use.

(f)

<b>Proposed text:</b>	MIX Wood – Supports the certification of responsible forest management
<b>Accurate</b>	A little more information is given compared with option (e), but it is still unclear how this support is being given. It is not clear that it has to do with sourcing. The title 'Mix' does not help to solve this problem. The claim can be substantiated.



<b>Misleading</b>	Not misleading.
<b>Practicality?</b>	The current label text system may need to be changed somewhat to adjust removal of the connecting word “from” (such as “Wood from well-managed forests”). Relatively short and easy to use.

(g)

<b>Proposed text:</b>	MIX Wood – Responsible use of forest resources
<b>Accurate?</b>	Depends on definition of “responsible use”. Vague in not specifying how this is achieved (amount of forest-based materials used? type of material used?). This sentence was the most preferred text by consumers.
<b>Misleading?</b>	Not misleading, but vagueness might imply incorrect associations.
<b>Practicality?</b>	Relatively short and easy to use.

(h)

<b>Proposed text:</b>	MIX Wood (No text, only link to further information [URL or QR])
<b>Accurate?</b>	Depends on information provided and the ease of use of the link.
<b>Misleading?</b>	Not misleading.
<b>Practicality?</b>	Providing correct language versions for hyperlinks for all markets might be challenging. QR codes could follow the general language used for the label.

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Questions and comments:  
[s.hotti@fsc.org](mailto:s.hotti@fsc.org)  
[trademark@fsc.org](mailto:trademark@fsc.org)