



FSC Advice Note

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Title: Printers – Chain-of-custody and Labelling Specifics

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Advice sought on Which chain-of-custody and labelling standards apply for printed materials and how?

FSC Advice

1 Applicable FSC chain-of-custody standard

- 1.1 Certification bodies shall evaluate companies such as printers or publishers (herein referred to as "the company") against chain-of-custody standards based on Part 3.6 of the Accreditation Manual.
- 1.2 The company may apply the May 2000 *FSC-POL-40-001 FSC Policy on Percentage Based Claims* to printed materials.
- 1.3 Printed materials are under the FSC requirements for 'Chip and fibre products' which must be in compliance with the minimum thresholds for 'Chip and Fibre Products' as indicated in Section 1.2 of *FSC-POL-40-001*.
- 1.4 The current minimum percentage of FSC-certified material is 50% by weight of the total virgin material used in the printed publication.
* as of June 2005
- 1.5 A printed publication shall be considered as one product, when calculating the minimum percentage for labelling and controlling non-certified components.

2 Receipt of FSC-certified input materials

- 2.1 If the company exclusively sources FSC-certified materials for a printed publication, calculations of percentage based claims do not have to be performed for this product, unless the buyer requests such claims.

- 2.2 This is also applicable when exclusively sourced FSC-certified materials include:
- a) Paper products from old stock* certified and labelled e.g. with a 30% claim; OR
 - b) Paper products certified and labelled as FSC-recycled.

In such cases the printed publication is eligible to carry an FSC label (see 4.1 and 4.2 below).

* i.e. manufactured before June 2005.

- 2.3 In other cases, if the company receives FSC material certified according to
- a) the FSC Credit System of FSC-STD-40-004 (i.e. products marked as 'FSC-credit material' on the invoice), all of this material can be used in calculations for percentage based claims;
 - b) the Threshold System of FSC-STD-40-004 or covered by a percentage based claim according to FSC-POL-40-001, the company shall use the percentage of FSC material stated on the supplier's invoice to calculate their percentage based claims.

3 Control of non-certified components

- 3.1 The company shall be in compliance with Section 3 of FSC-POL-40-001 '*Uncertified contents and controversial sources*' with respect to non-certified components of printed publications.

Note: This requires the development of safeguards and systems if less than 70% of the total virgin material is supplied as FSC-certified.

4 Applicable FSC labels for print materials

- 4.1 Printed materials shall be labelled in accordance with FSC-STD-40-201 and FSC-GUI-40-201 respectively.

Note: Based on the nature of the certified material (paper) used in printed publications, usually the FSC 'Mixed sources' label is usually indicated. The correct variation of the FSC 'Mixed sources' label shall be in accordance with the content of the paper used in the printed publication.

- 4.2 If a printed publication is made up of FSC-recycled material only (i.e. material labelled with the FSC-recycled label or in compliance with FSC-STD-40-004 for labelling as FSC-recycled*), the company may apply for the use of the 'FSC-recycled' label.

*Products manufactured with 100% recycled content

Basis for advice

- ad 1.1: Printed publications are currently not included in the scope of *FSC-STD-40-004 FSC chain of custody standard for companies supplying and manufacturing FSC-certified products (version 1.0)* as this chain-of-custody standard was not designed for printers.
- ad 1.4: For companies applying FSC-POL-40-001, the minimum percentage of FSC-certified material in relation to the total virgin material used in a product has been raised to 50% for 'Chip and fibre' products as of June 2005.
- ad 1.5: In the past there were exceptions granted to label only the certified part of a printed publication; however, to avoid inconsistencies with current FSC labelling requirements, these exceptions will no longer be upheld in the future.

- ad 2.1: This is based on the assumption that (and restricted to those cases where) printed materials are finished, unalterable products that will not be entered into subsequent calculations of percentage-based claims or minimum thresholds by buyers of such products.
- ad 2.2: If a strict and literal interpretation of FSC-POL-40-001, Section 1.2 is applied, printers would not be able to label printed publications that were solely made up of paper products from old stock labelled e.g. with a 30% claim or paper products labelled as FSC-recycled. This is not reasonable as printers do not change the material composition of the paper but at best add a neutral component (printer's ink).
- ad 3.1: Materials and components purchased as FSC-certified do not need to be included in assessments of potentially 'controversial sources'. The percentage stated in Section 3.1 of FSC-POL-40-001 for 'Chip and fibre' products should be interpreted as referring to the proportion of FSC-certified supplies (carrying a percentage claim or not) versus non-certified supplies of virgin material and not as referring to the overall amount of virgin material in the output product.
- ad 4.2: This option is currently not provided for in FSC-GUI-40-201.

References

- FSC-GUI-40-201* *Guidance on the implementation of FSC-STD-40-201 (Dec. 2004)*
- FSC-POL-40-001* *FSC Policy on Percentage-Based Claims (May 2000)*
- FSC-STD-40-004* *FSC chain of custody standard for companies supplying and manufacturing FSC-certified products (version 1.0, Oct. 2004)*
- FSC-STD-40-201* *FSC on-product labelling requirements (version 2.0, Nov. 2004)*