

Comments to FTC in regards to: 16 CFR Part 303: Rules and Regulations Under the Textile Fiber Products Identification Act

From: Jennifer Hargrave, Bureau Veritas, C.P.S.

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1- In regard to including other languages on fiber content labels:

Many US retailers are expanding their selling base beyond the US and into many other countries. In an effort to provide one label that can be used for multiple countries, many are adding other languages to the English US wording. At times, the label can become confusing and/or difficult to read. Below are a few examples:



After reviewing several alternatives, we ask that the FTC clearly define an acceptable format or formats to avoid confusing labeling, while keeping in mind the need to keep labels from getting too lengthy.

One suggested format is as follows:

_% Generic fiber name in English

_% Generic fiber name in English

Additional Wording in English

_% Generic fiber name in other language

_% Generic fiber name in other language

Additional wording in other language

Example, using French for Canada:

90% Cotton

8% Nylon

2% Spandex

Exclusive of Decoration

90% Coton

8% Nylon

2% Spandex

Décoration non comprise

Another suggested format is as follows:

_% Generic fiber name in English/other language

_% Generic fiber name in English/ other language

Additional Wording in English/ other language

Example, using French for Canada:

90% Cotton/ Coton

8% Nylon/ Nylon

2% Spandex/ Spandex

Exclusive of Decoration/ Décoration non comprise

2- In regard to current rule regarding "other fibers":

It is unclear as to why the rule now includes the use of the term "other fibers" for fibers present in less than 5%, unless it has a functional significance. The Wool Act requires that any amount of wool must be disclosed. Therefore, we recommend that the Textile Products Labeling Act be revised to also allow for the generic fiber name of fibers present in amounts than 5%, no matter what the purpose of that fiber is, either as a rule or an option.

3- In regard to "exclusive of decoration":

We would like the FTC to clarify the reasoning as to why "exclusive of decoration" is needed in situations where the same generic fibers are blended into the body fabric and decoration, but in different amounts. For example: Body fabric is 65% Cotton 35% Polyester, and decoration is 80% Polyester 20% Cotton. Both the body and decoration are made of polyester/cotton blends. Or the situation in which a 100% polyester decoration is on a cotton/polyester blend garment. Does a consumer need to know that the decoration is made of a different blending of the same fibers?