

Federal Trade Commission

Title: Announcement of Public Workshop; Request For Public Comments

Subject Category: Guides for the Use of Environmental Marketing Claims

First I want to thank the FTC for inviting me to speak at the Green Textiles workshop on July 15. I was asked to also submit official comments. I have been involved in the environmental assessment of many different raw materials and textile processes for my job at Patagonia. I urge you to consider the following input when revising the green guides:

1. Organic cotton fiber should be grounds for a green textile claim, recognizing textile processing is a separate issue
2. Recycled-content fibers (Post-consumer or Pre-consumer) should be grounds for a green textile claim, recognizing textile processing is a separate issue
3. Please insist that bamboo made by the viscose rayon-type process be labeled "rayon" or "rayon from bamboo" and refuse the right to make a green textile claim based on use of this fiber, since it is not more environmentally-friendly than standard viscose rayon (commonly made from by-products of the pulp & paper industry), and the spinning process uses toxic chemicals such as carbon disulfide solvent that can pollute the environment
4. Please insist that regenerated protein fibers (ex. made from soy or milk) are labeled as "azlon" or "azlon made from soy (or milk)" and question the right to make a green textile claim based on use of this fiber, recognizing that the solvent-spinning process uses potentially toxic chemicals which need to be identified
5. Please insist that "natural" or "renewable" claims do not necessarily substantiate a green textile claim, since agriculture can have large-scale environmental impacts such as water and air pollution and soil erosion and therefore cannot inherently be regarded as environmentally-friendly
6. Regarding textile processing, such as dyeing and chemical finishing, reliable third-party certifications (bluesign and others) should be used to substantiate green textile claims based on "safer" chemical use or water/energy conservation (Please do not limit this to only one certification)

Thank you for taking time to review comments and revise the green guides.

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