



# Texas Organic Cotton Marketing Cooperative

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August 14, 2008

Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex B)  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580  
(filed in electronic form)

Re: Green Building and Textiles Workshop—Comment, Project No. P084203

Texas Organic Cotton Marketing Cooperative (TOCMC) represents 39 organic farmers in west Texas who produce a large majority of the organic cotton grown in the U.S. As American organic cotton farmers, we believe that it is important for companies to be able to communicate with consumers about their utilization of organic fiber regardless of whether they are using organic or transitional fiber or the percentage of organic fiber in the final product. We fully support the revisions of the FTC *Green Guides* and offer the following comments:

## 1. Recognition of Organic Certification

FTC should recognize third party organic certification as a “reasonable basis” of proof of an environmental claim. Certification to organic standards has been in place for years worldwide, and laws and regulations are already in place and recognized by governments. USDA and NOP have strong accreditation programs that reinforce the integrity of the law governing the word “organic.” NOP undertakes strict audits of certifiers and those that do not meet the standards lose their accreditation.

## 2. Green Textile Claims

Numerous claims such as “better, green, sustainable, natural or renewable” are made on a range of products, without there being a clear definition of these terms or a third party independent verification process to support the claim. The use of these terms should require verification to third party standards or independent testing to protect against misstatements.

### 3. Claims Regarding Organically Grown and Natural Textile Products

TOCMC believes the *Green Guides, Calling it Cotton: Labeling and Advertising Cotton Products, Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts*, and similar items should all be revised to permit the *truthful* labeling of:

- a. Products with organic fiber content of any amount, as long as the organic content has been verified. For example, the “OE Blended Standard” requires verification by a third party that the claim of “x” percent organic fiber in the product is truthful. Similarly, use of the “OE 100 Standard” requires verification that all the fiber in the product is organic.
- b. Organic fiber products which have been certified to voluntary processing standards such as the Global Organic Textile Standard (GOTS) or other such verifiable standards that cover post-harvest processing. These standards include strong provisions restricting the types of processing agents that may be used on an organic textile product, providing assurance to the consumer that the item is as organic as possible from field to finished product.
- c. Products that have been made with “transitional” or “in conversion” organic fiber. This is fiber that is grown organically according to the law, but has not yet received full organic certification due to the required three-year waiting period. Such a label would enable the organic fiber marketplace to grow while supporting the farmer during the three-year transition period.

### 4. Third Party Certification and Seals

- a. As long as organic textiles are not specifically addressed in the *Green Guides, Calling it Cotton* and other such overviews, the documents will not be as effective as they could be in limiting misleading claims.
- b. We believe the organic certification process must have verification at both the farm gate level and beyond. Organic certification groups are accredited by the International Federation of Organic Farming Movements (IFOAM), USDA, and other reputable organizations and subject to stringent audits.

On behalf of TOCMC, I would like to thank the FTC for your leadership in addressing potentially misleading claims that can be made in the burgeoning “green” textile sector. It is through your leadership that companies will gain clarity on the kinds of claims that can be made so both the environment and the consumer benefit.

Very truly yours,

Kelly Pepper  
Manager