

RE: Green Building and Textiles Workshop – Comment Project No. P084203**A. Green Textile Claims**

I think the Guides although a great basis to build on is missing some important pieces when it comes to textiles.

RE: 260.6 General Principles

(b) Distinction between benefits of product, packaging and service:

I think here is where we need to add the distinction between the raw fiber and the processed fabric. When assessing a “green” claim as it applies to textiles there are really 2 fundamental pieces of the puzzle...1. How/what is the raw materials/fiber? 2. How was it processed?

Example: Cotton could be grown organically (to the NOP standards or global equivalent) and then it could be processed with a formaldehyde finish. Could this be called an “organic” fabric? I believe we need to start differentiating between the contents and the processing of that content.

Example 2: Bamboo could be grown organically (without pesticides, etc) and then put through a chemically extensive process.

B. Claims Regarding Organically Grown and Natural Textile Products

(1) Organically grown raw materials should meet the NOP or equivalent global standards in terms of the raw fiber and ability to state the content portion. In order to label the product as “organic” an additional certification to The Global Organic Textile Standard (GOTS) a credible private, voluntary standard for organic textile processing should be met.

(2) Natural is a meaningless term... and unless defined and regulated should not be used to exaggerate the claim. Same is true of “green”. I do think both terms are being used loosely and deceptively.

(3) The Cotton Inc. message that “cotton is green” stated in the minutes from your workshop held on July 15th is in my opinion deceptive. Although the statistics that they are growing more cotton on less land with fewer chemicals is true, when applied to USA cotton farms, this is absolutely not true when it comes to farms around the world. To not be differentiating USA grown cotton in their marketing they are misleading the consumer into believing that all cotton farming has improved. Please see <http://www.ejfoundation.org/page93.html> for detailed information. If they are to continue this campaign they need to highlight the Made in the USA prominently so as to not give the impression that their information applies to all cotton.

Another area of deception is bamboo. Again there needs to be a differentiation between the fiber and the processing. To make “green” marketing claims you have to address both the growing and the processing. There are hundreds of bamboo websites touting the antibacterial properties of rayon from bamboo, which from what I have heard and read in the transcripts from your workshop on July 15th is not true. Bamboo processing is a huge area of misleading information.

C. Third-Party Certification and Seals

(1) I do not see much in the Guides concerning 3rd party certification. There are currently over 40 “eco” labels for textiles world wide, making navigating this area difficult for the consumer as well as businesses.

(3) I am very grateful for the Global Organic Textile Standard which holds the potential to be THE standard for organic textile processing, thereby eliminating much confusion.

I agree with the OTA’s response to this:

“OTA considers organic claims on textile products that are certified according to GOTS to be appropriate and credible. GOTS provides detailed criteria and standards for certification of textile products that can be labeled as “organic” or “made with organic fiber,” which must be verified by an approved GOTS certifying body that is accredited under ISO 65. GOTS standards and requirements for certification can be found at: www.global-standard.org.”

(4) Yes, I believe the Oeko-Tex certification is currently very misleading

example: Pottery Barn catalog which calls Oeko-Tex the “world’s definitive ecological certification process – so they are made with substantially fewer chemicals than conventional toweling” After researching Oeko-Tex’s own website it is clear that Oeko-Tex 100 is a simple residue test and to the best of my knowledge does not address the actual processing. As long as the finished product is free of chemical residue it can gain the certification, regardless of how toxic the process may be. Oeko-Tex 1,000 does address the processing but very few companies are disclosing which they are certifying to and when I called Pottery Barn to ask I was informed that they were certifying to Oeko-Tex 100.... Making their statement in my opinion very misleading. I think it should be required that if people are going to use this certification that they MUST disclose which (100 or 1,000) and NOT exaggerate the environmental marketing claims as explained in Guides: 260.7

I think the GOTS is a more thorough and less misleading standard.