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“Proposed, Revised Green Guides, 16 CFR Part 260, Project No. P954501”

Gentlemen,

We have read “recycled content claims” in the Green Guides and have special interest in the debate between post consumer and pre-consumer content being equally labeled as recycled.

As a manufacturer of filament polyester yarn with a large percentage of our yarn made from 100% recycled PET bottles (ECO-Fil) we feel the following comments help to clarify industry standards:

- Our long held company and industry position is that 100% post consumer PET bottle resin represents the gold standard and contributes to an elite marketing position - if it is denigrated in any way with a blend of pre consumer or otherwise it lessens the message and brand integrity.
- Our industry understands the following distinction between post consumer and pre-consumer:

1. PET post consumer flake or resin -

The only 100% source we know is PET bottles (destined to landfill) and they qualify provided they have been filled and depleted by consumer.

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2. PET pre-consumer waste - there are three sources:

- Fiber producer - thread waste and floor waste.
- Yarn spinner or texturizer - yarn waste, soft waste and floor waste.
- Knitter/weaver/cutter - clips & fabric cuttings.

The #2 PET pre-consumer waste above collection areas intrinsically have contamination problems with other fibers i.e. nylon, viscose & cotton - therefore these categories cannot be labeled 100% PET. Further these categories are not destined for landfill but historically been reused, re-manufactured (chopped and garneted for comforters, pillows and other non-woven applications) never consumed hence not recycled - so what we have in pre-consumer waste is a category not virgin, not 100%, and not recycled - note, further clarification by the Association of Contract Textiles (ACT) that scores recycled content for Leeds point system. (Illustration F)

Labels should be meaningful, honest and serve to build consumer confidence and trust and if they are undermined by blending or allowing pre-consumer product to be labeled as recycled we are distorting industry standards and as a yarn manufacturer is the first step in the process chain it would give downstream manufacturing a false foundation to build on.

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In addition, the consumer has been bamboozled with what's going on in labeling - every manufacturer jumping on the green bandwagon with all sorts of false claims, massaging the story and creating ambiguities (Illustration A, B, C, D, E, F) - I would hope that green guides clarifies for the industry and the consumer the following distinctions- recycled vs. non-recycled categories:

Recycled - 100% post consumer waste or PET bottles

vs.

Non-Recycled - Blend of PET bottle and pre-consumer

vs.

Non-Recycled - Pre Consumer PET Waste

Awaiting your final comments.

Sincerely yours,
Tim O'Mara
President
North Carolina

WHAT IS REPREEVE?

HOW GREEN IS REPREEVE? REPREEVE GIVE BACK SUSTAINABILITY

A UNIQUE RECYCLED PRODUCT

MAKING REPREEVE POLYESTER

MAKING REPREEVE NYLON

WHO M

WHAT IS REPREEVE? 100% RECYCLED. MADE BETTER.

A.

Repreve isn't like other recycled fibers. It took years to develop the process that makes Repreve a leading recycled yarn. We tightly manage every step, and pass strict annual certifications by outside third parties.

- LEARN ABOUT MAKING REPREEVE RECYCLED POLYESTER
- LEARN ABOUT MAKING REPREEVE RECYCLED NYLON

B.

Recycling Different Kinds Of Waste

Repreve pulls post-consumer products out of the waste stream. But making Repreve is not just about recycling things like used water bottles.



Behind every mound of post-consumer waste is a mountain of pre-consumer waste. That's why our process includes collecting and using pre-consumer waste from manufacturing. We start with our own—collecting and reusing all of our own industrial waste. To conserve more natural resources.

What It Takes To Wear The Repreve Label

Repreve is made better. And we protect what it stands for, too. Products made from fabrics with Repreve are tested and certified before they can use the Repreve label.



cals, fibers, textiles and consumer products such as clothing or bags. DNAtex is clearly and quickly recognized by a small electronic scanner that looks for the "unique ID" and immediately tells the user if it is an original item or a counterfeit. According to Schoeller, DNAtex was originally developed to protect the company's own fabrics and technologies, but more recently is broadening the reach of the product's availability.

Schoeller is also extending the use of c_change with two interesting and unique new footwear lining materials. The c_change membrane is water and windproof, offers a high level of breathability and conforms to the bluesign standard. The three-layer version (shoe lining, membrane and charmeuse) is suitable for summer use; the four-layer version is equipped with an additional warming fleece more fitting for winter applications.

9. SMARTSILVER has partnered with Wigwam to make new Anti-Odor Merino Wool Performance Socks. The new Wool Runner socks, feature the softness of Merino wool with SmartSilver's anti-odor protection.. SmartSilver antimicrobial additives bind to fibers and won't wash out or wear off for the expected life of the socks, according to Dr. James

Delattre, VP global marketing at NanoHorizons Inc. SmartSilver additives are EPA registered. Plus, they are approved by the International Oeko-Tex Association indicating that they are free from harmful levels of more than 100 substances believed to be hazardous to human health.

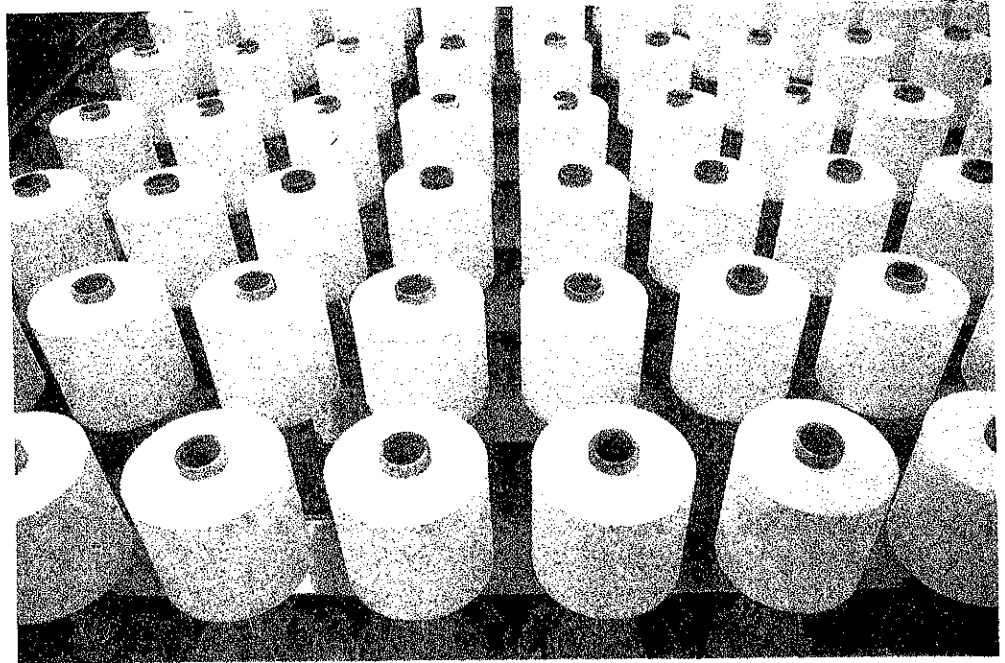
C.
10. UNIFI continues to grow its family of Repreve recycled products with the introduction of a new fiber made from 100 percent post-consumer PET bottles. The new addition offers a 100 percent post-consumer option to the brand's well known 100 percent hybrid blend, which combines pre-consumer and post-consumer content.

Unifi, in an effort to ensure that fabrics and products made from Repreve are traceable, transparent and certifiably sustainable, is introducing during Summer Market this month the novel U TRUST verification program. U TRUST is a comprehensive certification program designed to provide Repreve customers with a new level of transparency. As part of the U TRUST program, the company is introducing FIBERPRINT - a unique technology allowing for enhanced traceability in fabrics and products. Unifi will be able to analyze fabrics for the FIBERPRINT signature and certify the level of Repreve content. ♦

through the U Trust™ verification program, in which Repreve fiber is third-party certified for 100% recycled content claims by Scientific



Certification Systems, and Oeko-Tex certified to be free of harmful levels of more than 100 restricted chemicals. In addition, throughout the supply chain, using unique Fiberprint™ technology, Unifi can verify that Repreve is in manufactured fabrics and products, and in the right amounts.



An Ever-Growing Commitment To Sustainability

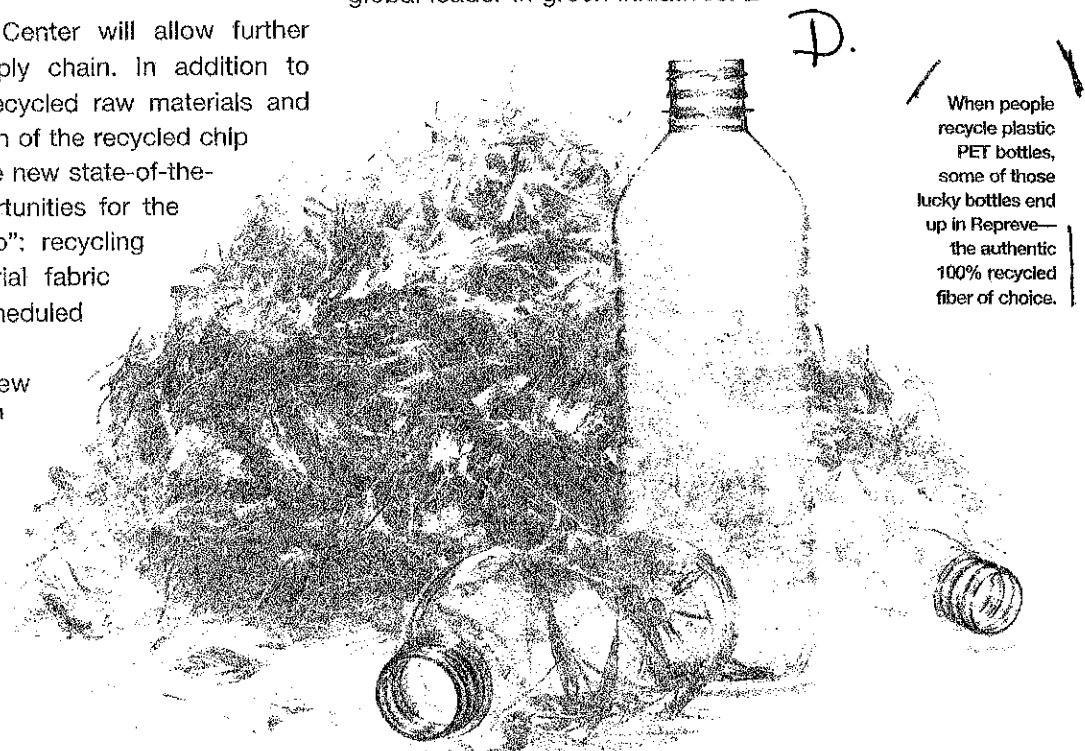
Developing Repreve recycled fiber was just the beginning. Unifi is continually expanding its commitment to sustainable practices and initiatives. New investments involve the integration of recycled product collection and processing into the supply chain, and a new joint venture focused on renewable energy.

The new Repreve Recycling Center will allow further integration of the Repreve supply chain. In addition to providing a consistent flow of recycled raw materials and greater control over the production of the recycled chip that is used to make Repreve, the new state-of-the-art technology will provide opportunities for the Company to "complete the loop": recycling post-consumer and post-industrial fabric waste directly into Repreve. Scheduled startup is February 2011.

Unifi has also entered a new joint venture, called Repreve™ Renewables, which will focus on marketing Freedom™ Giant Miscanthus to farmers. They, in turn, will supply the product to bioenergy and biofuel operations in the U.S. and E.U. Freedom Giant Miscanthus is a non-

invasive, perennial C4 grass that is extremely efficient in converting sunlight to biomass energy, the highest-yielding biomass feedstock available on a commercial scale.

As environmental stewardship and sustainability become more important to companies around the world, these new investments, combined with the continued growth of Repreve recycled fiber, will solidify Unifi's position as a global leader in green initiatives. ■



When people recycle plastic PET bottles, some of those lucky bottles end up in Repreve—the authentic 100% recycled fiber of choice.

WHAT IS REPRIEVE?	HOW GREEN IS REPRIEVE?	FIGURE E-GIVES BACK	SUSTAINABILITY
ECO-BENEFITS	END USES		

IT'S A REPRIEVE FOR THE PLANET.

Reprieve diverts waste from the landfill. For sure, soda bottles. But tackling the problem is not just about recycling soda and water bottles, or post-consumer waste. Because behind every mound of post-consumer waste is a mountain of pre-consumer waste. (The waste created by manufacturers when they make products for consumers) Guess what? Unifi uses both to make Reprieve polyester.

It offsets the need to refine new crude oil. Reprieve is made from 100% recycled materials, offsetting the need to use new crude oil. Did you know that on average, every pound of Reprieve yarn conserves the equivalent of half a gallon of gasoline?

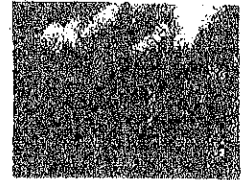
It requires less energy to produce. Crude oil refining is a long process that consumes precious natural resources and energy—far more than it takes us to process recycled materials into Reprieve.

Polyester And Nylon Come From Crude Oil

Did you know... polyester, nylon, and water bottles all come from the same natural resource as gasoline? Crude oil is the natural resource in thousands of things we use every day. Computers. Auto hardware. Heart valves. Credit cards. Toys. And yes, even clothing. By recycling materials into Reprieve we are offsetting the need to produce new raw materials. Which helps reduce the demand for this precious natural resource.

Recycling Helps Offset Refining

As a leading yarn manufacturer, we feel it's our responsibility to do our part. Using less crude oil is a major way to reduce our environmental footprint. With Reprieve, we're doing everything we can to cut our reliance on it.



Reprieve is made entirely without drilling for oil refining it, transporting it, breaking it into chemicals, blending it with other additives, or turning it into the raw materials needed for manufacturing. Recycling allows us to reuse materials already made from precious natural resources. With today's concerns about the environment, reducing demand is better for everyone.



Illustration F

Calculating Points for Fiber Sourcing Using "Ingredient" Approach

Product Example: 50% antimony-free, post-consumer recycled PET; 30% organic bamboo; 20% bast w/ treated wastewater

Fiber Sourcing -- Revised 6/9/09 T. Mak	Credit	Max Optional Pts	Fiber Ingredients	
			Enter data in this column only Fiber Content as % of Total Fiber Mass	Calculated Actual Pts (= max pts * % fiber content)
NO PREREQUISITES	5.3	---	---	---
OPTIONAL	5.4	---	---	---
Selection of fibers that are not fossil fuel based	5.4.1	---	---	---
Rapidly-Renewable Fibers (minimum 10% by weight)	5.4.1.1	---	---	---
Percentage of rapidly renewable fibers consisting of				
Natural fibers like seed, bast, and animal fibers		12	20.00%	2.400
Bio based fibers like polylactic acid (PLA), polyhydroxyalkanoates (PHA)		12	0.00%	0.000
Selection of least-processed fibers (natural fibers)	5.4.1.1.1	2	50.00%	1.000
Renewable Fibers (minimum 10% by weight)	5.4.1.2	---	---	---
Regenerated cellulose fibers like rayon from bamboo		6	30.00%	1.800
Recycled Fibers (minimum 10% by weight)	5.4.1.3	---	---	---
Pre-consumer (Post-industrial) recycled fibers	5.4.1.3.1	8	0.00%	0.000
Post-consumer recycled fibers	5.4.1.3.2	16	50.00%	8.000
Selection of fibers with reduced toxic chemical inputs	5.4.2	---	---	---
Organic	5.4.2.1	6	30.00%	1.800
Transitional-organic/in-conversion-organic	5.4.2.2	3	0.00%	0.000
Integrated Pest Management	5.4.2.3	2	0.00%	0.000
Cotton and Other Natural Cellulosic Fibers	5.4.2.4	2	0.00%	0.000
Greasy wool and other Keratin Fibers	5.4.2.5	2	0.00%	0.000
Bast Fibers	5.4.2.6	2	20.00%	0.400
Manmade Cellulosic (Regenerated Cellulosic) Fibers meeting content, emissions, and effluent requirements	5.4.2.7	2	0.00%	0.000
Polyester Fibers "free of antimony"	5.4.2.8	4	50.00%	2.000
Nylon Fibers produced with reduced N ₂ O emissions	5.4.2.9	4	0.00%	0.000
Polyolefin Fibers produced without lead based additives	5.4.2.10	4	0.00%	0.000
Acrylic Fibers produced with reduced acrylonitrile content and emissions to air	5.4.2.11	4	0.00%	0.000
Total Points (actual pts rounded to 0.00; max 20.00 pts)		20	---	17.40