



INTERNATIONAL
SLEEP
PRODUCTS
ASSOCIATION

August 15, 2008

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

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

The International Sleep Products Association (ISPA) is the trade association representing the mattress manufacturing industry. ISPA currently represents more than 750 mattress manufacturers and bedding component, machinery and service suppliers in some 50 countries around the world. ISPA welcomes the opportunity to comment on several of the questions posed in the FTC's June 10, 2008 Federal Register Notice (73 FR 32662), specifically those questions concerning environmental claims for textiles.

As the marketing of "green" consumer products evolves, it is critical that the *Green Guides* be updated to provide manufacturers, retailers, and consumers with clearly defined criteria for making and evaluating environmental marketing claims. In response to growing consumer awareness and demand for such products, mattress manufacturers, like other industries, are adapting their products and marketing to meet these demands.

The current *Green Guides* provide guidance for making some environmental marketing claims, but do not reflect the current state of the market for products made from textiles, such as mattresses. We support the FTC's efforts to update its *Green Guides* in this regard and encourage the Commission to examine claims currently being made by textile and textile product manufacturers.

ISPA urges the FTC to include guidance for such terms as "chemical free," "organic," "organically grown," and "natural," as well as other environmental claims as they relate to textiles. An increasing number of mattresses are being marketed as organic or containing organic materials. Our industry and consumers will benefit from uniform rules setting objective criteria that describe when these and similar terms may be used, and the documentation required to substantiate such claims.

The marketplace is also seeing an increase in the use of terms such as "sustainable" and "renewable." ISPA urges the FTC to define these and other similar environmental terms relating to the life cycle of a product using objective and quantifiable criteria. The FTC should clearly identify the types of documentation and assessments required before such claims may be asserted.

To the extent possible, the FTC should base definitions and assessments contained in the *Green Guides* on current business practices in order to minimize compliance costs. ISPA urges the FTC to require that all product labeling and advertising conform to these criteria.

The *Green Guides* can serve as a valuable resource for businesses making environmental claims. Paramount to this effort is uniformity and broad acceptance of the *Guides*. The FTC should make clear that these rules are intended to be national in scope, preempting any inconsistent or differing state requirements in this regard.

ISPA also urges the FTC to work with U.S. Customs and Border Protection to prohibit the entry into the United States of imported goods that contain labels or other documents with claims that do not comply with these rules. To publicize and encourage broader compliance with these rules, ISPA urges the FTC to consider processes that would allow consumers or competitors to challenge the validity of questionable claims.

Finally, ISPA anticipates that consumer demand for greener products will continue to grow and that green-related marketing will continue to evolve. Therefore, it is critical that the FTC regularly review and update the *Guides* at least every five years.

Thank you for the opportunity to share our remarks. Should you have any questions, you may contact me at (703) 683-8371 or chudgins@sleepproducts.org.

Sincerely,



Christopher Hudgins
Vice President
Government Relations & Policy