



***Claims Regarding Organically Grown and Natural Textile Products***

*(1) Should the Guides be revised to include guidance regarding environmental claims for organically grown textile products? If so, why, and what guidance should be provided? If not, why not?*

ECONscious supports a revision of the Guides to provide specific guidance to ensure that consumers have an easier task of deciphering the plethora of “green claims” in the textile sector. The revised Guides should cover not only organically grown textile products but also man made/ synthetic fibers.

In regards to fiber from an agricultural source our suggestion would be to reference the USDA National Organic Program (NOP) for to the growing standards of the fiber. The NOP however is not a valid standard for the processing of fiber and we strongly encourage the FTC to adopt the Global Organic Textile Standards (GOTS – [www.global-standard.org](http://www.global-standard.org)) as the de facto “green standard” for agricultural textile production.

- (a) What evidence supports making your proposed revision(s)? Please provide this evidence.*
- (b) What evidence is available concerning consumer understanding of the term “organic” when used to describe a textile product? Please provide this evidence.*
- (c) What evidence constitutes a reasonable basis to support an organic textile claim? Please provide this evidence.*

c) A verifiable third party certification that includes not only the growing of the fiber but just as importantly that the processing of the fiber has been done in an environmentally responsible way. Third party certification to the GOTS standards would provide this evidence.

*(2) Should the Guides be revised to include guidance regarding environmental claims for so-called “natural” textile products? If so, why, and what guidance should be provided? If not, why not?*

- (a) What evidence supports making your proposed revision(s)? Please provide this evidence.*
- (b) What evidence is available concerning consumer understanding of the term “natural” when used to describe a textile product? Please provide this evidence.*
- (c) What evidence constitutes a reasonable basis to support a natural textile claim? Please provide this evidence.*

ECONscious does not believe that the term “natural” has a clear meaning in the textile sector and that this type of labeling should not be allowed.

*(3) Are there claims regarding organically grown or natural textiles in the marketplace that are misleading? If so, please describe these claims and provide any evidence that supports your answer.*

The textile sector has seen a tremendous increase in the organic and natural sector in the last five years and this coupled with the NOP's lack of guidelines for organic textile products, has created a market where confusion prevails regarding what is and what is not allowed.

We urge the FTC to work with the NOP to come up with an acceptable organic fiber standard that is based on growing the fiber organically and processing of the fiber in accordance to accepted international standards for environmentally sound fiber processing. (GOTS)

*(4) To the extent not addressed in your previous answers, please explain whether and how the Guides should be revised to prevent consumer deception, provide business guidance, and/or reduce costs that following the Guides may impose on businesses, particularly small businesses, with respect to environmental claims for organically grown or natural textiles. Please provide any evidence that supports your answer.*

The adoption of the GOTS standards by the FTC and the NOP would encourage the global move towards the use of this standard and therefore reduce the cost to companies producing organic textiles. Currently textile factories working on a global scale are forced to get themselves certified to different standards for different customers based on the country their goods are shipping to. Large and small manufacturers would reduce cost if the number of certifications went down. Global harmonization of standards will ultimately reduce confusion, lower costs and strengthen the credibility of the universally adopted standard.

#### ***Third-Party Certifications and Seals***

*(1) How effective have the Guides' provisions regarding third-party certifications and seals been in preventing consumer deception and providing business guidance with respect to environmental claims for textiles, building products, or buildings? Please provide any evidence that supports your answer.*

We find little evidence of provisions for third-party certification in the Green Guides and would encourage clarification on this issue. We would like the Guides to describe to consumers how to evaluate the credibility of a third party claim.

*(2) Has there been a change in consumer perception claims using third party certifications and seals for textiles, building products, or buildings since the Guides were revised (1998)?*

*(a) If so, please describe this change and provide any evidence that supports your answer.*

*(b) Should the Guides be revised to address any such change? If so, how?*

The implementation of the NOP "USDA Organic" label in 2002 has had a very positive effect on consumer recognition of seals.

We would encourage the creation of a textile specific "USDA Organic" labeling that would be based on the same organic agricultural practices in the NOP but have a specific allowed substance list to textiles.

In the fiber sector the use of seals like Oekotex 100 is starting to have an impact and be recognized by consumers. This process has taken years to gain acceptance.

*(4) Are there environmental claims for textiles, building products, or buildings using third-party certifications and seals in the marketplace that are misleading? If so, please describe these claims and provide any evidence that supports your answer.*



No comment

*Green Building and Textiles Claims Currently Not Addressed by the Green Guides*

*(1) Should the Guides be revised to include guidance regarding “sustainable” or “renewable” claims for textiles and building products? If so, why, and what guidance should be provided? If not, why not?*

*(a) What evidence supports making your proposed revision(s)? Please provide this evidence.*

*(b) What evidence is available concerning consumer understanding of the terms “sustainable” or “renewable” with respect to textiles and building products? Please provide this evidence.*

*(c) What evidence constitutes a reasonable basis to support a “sustainable” or “renewable” claim with respect to textiles and building products? Please provide this evidence.*

No comment

*(2) Should the Guides be revised to include guidance regarding life cycle claims for building products?*

No Comment

*(3) Are there other environmental claims concerning textiles or building products not currently addressed by the Guides, and if so what are they? Please provide any evidence that supports your answer.*

*(a) Should the Guides be revised to include guidance regarding these claims? If so, why, and what guidance should be provided? If not, why not?*

*(b) What evidence is available concerning consumer understanding of these claim(s)? Please provide this evidence.*

*(c) What evidence constitutes a reasonable basis to support these claim(s)? Please provide this evidence.*

We feel that there is a need for environmental green standards not only for organically grown agricultural products but also for synthetic or man made fibers. There is a high degree of confusion in the marketplace in regards to for instance; Bamboo fiber (Rayon from Bamboo as well as mechanically treated Bamboo), recycled and recycleable products, soy fiber, PLA derived from corn among others.

The challenge here is that there are few internationally accepted standards to use in certifying these claims. In the meantime we feel that manufacturers claiming environmental benefits from any fiber need to have scientific data to back their claims.

For ECONscious / Stefan Bergill August 15/2008