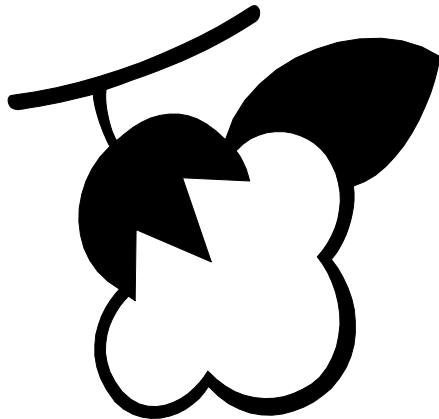


# Facts for Business

## Calling It Cotton: Labeling & Advertising Cotton Products



Federal Trade Commission  
Bureau of Consumer Protection  
Office of Consumer & Business Education  
1-877-FTC-HELP [www.ftc.gov](http://www.ftc.gov)

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If you advertise or sell clothing or household items containing cotton, the product labels must accurately reflect the fabric content. So say the Textile Act and Rules, which are enforced by the Federal Trade Commission. The Textile Act and Rules cover fibers, yarns, and fabrics, and household textile products made from them, such as clothing and accessories, draperies, floor coverings, furnishings, and beddings.

The FTC has prepared this brochure to tell you what information must be included on labels and in written advertisements if you want to mention the presence of specific kinds of cotton in textile products.

### Labels

Any product covered by the Textile Act and Rules must include a fiber content statement.

- The fiber content statement must list the generic name of each fiber that equals 5 percent or more of the product's weight, in order of predominance, and the percentage of the product's weight represented by each fiber. For example, "85% Cotton, 15% Polyester." Fibers that are less than 5% of the weight should be listed as "other fiber[s]." However, if the fiber has a functional significance, even in small amounts, it may be listed by name. For example: "96% Cotton, 4% Spandex". A product should not be labeled "100% Cotton" unless it contains only cotton (exclusive of "trim"). For more information about

textile labeling requirements, see the FTC business guide, *Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts*.

- The fiber content statement may include the name of a type of cotton, cotton trademark, or a term that implies the presence of a type of cotton, as long as it's not deceptive. If you use a cotton name, trademark, or other term that implies the presence of a type of cotton, the generic fiber name "cotton" must be used with it. For instance, "100% Sea Island Cotton," "50% Pima Cotton, 50% Upland Cotton," "85% Egyptian Cotton, 15% Silk."
- You must use type of the same size and conspicuousness for the required fiber content information. The type must be reasonably easy to read. For example, "50% EGYPTIAN COTTON, 50% OTHER COTTON" is permissible; "50% EGYPTIAN COTTON, 50% other cotton" is not.
- If your product contains more than one kind of cotton, the fiber content statement doesn't have to specify the name and percentage of each cotton type. For example, the product may be labeled "All Cotton" or "100% Cotton." However, if the label of a product made from various kinds of cotton names a cotton type, it must also give the cotton's percentage by weight and must make clear that other types of cotton were also used to make the product. For

instance, a sheet that contains 65% Pima Cotton and 35% Upland Cotton may be labeled “100% Cotton,” “100% Cotton (65% Pima Cotton),” “65% Pima Cotton, 35% Upland Cotton,” or “65% Pima Cotton, 35% Other Cotton.”

- If your product contains more than one kind of cotton, a content statement that claims the product is made of only one type of cotton is not acceptable. For example, when a sheet contains 50% Egyptian Cotton and 50% Upland Cotton, a fiber content label that reads, “100% Egyptian Cotton,” is unacceptable.
- A fiber trademark or other term must not be used to imply the presence of a fiber that is not actually present in the product. For example, a trademark such as “Pimalux” (a fictitious trademark) couldn’t be used if the textile product didn’t contain pima cotton.
- Also, a trademark or other term that implies that a product is wholly made of one kind of cotton may not be used when the product is made of more than one kind of cotton, or when it contains fibers other than cotton. For example, “Pimalux Towel — 100% Cotton” would not be an acceptable disclosure for a product made of 50% Pima Cotton, 50% Upland Cotton because the statement may falsely imply that all of the cotton in the towel is pima cotton. An acceptable fiber content statement would be “Pimalux Towel — 50% Pima Cotton, 50% Upland Cotton.”

- Towel manufacturers may wish to distinguish between the fiber of the loops and the fiber of the ground, if the loops are made of a premium cotton such as Pima. A label saying “100% Cotton, 100% Pima Cotton Loops” or “100% Cotton, Pima Cotton Loops” is acceptable — assuming that the towel is made of 100% cotton and the loops are made entirely of Pima cotton. A label saying “100% Pima Cotton” or simply “Pima cotton” would not be acceptable if only the loops were Pima and the ground consisted of another kind of cotton.

If the loops and the ground of a towel are not the same generic fiber, the label must take into account the fiber weight of each. For example, if the loops are cotton and the ground is polyester and each comprises 50% of the weight, the label could say: “50% Cotton, 50% Polyester.” If the manufacturer wishes to show the fiber of the loops separately, however, the label should disclose: “100% Cotton loops, 100% Polyester ground (loops 50% of fabric, ground 50%).”

- A label reflecting only the content of the pile or the back is not acceptable. For example, when towel loops are 100% Pima Cotton, and the base fabric is 100% Upland Cotton, a label that says only “100% Pima Cotton” or “100% Pima Cotton Loops” is unacceptable.

- Any reference to a type of cotton that appears other than as a part of the required fiber content statement, even if it appears on the same label, is “non-required information.” Such information must: (a) be separate from the required information; (b) not interfere with, minimize, detract from, or conflict with the required information; and (c) not be false or deceptive as to fiber content. For example, if the required fiber content statement says “70% Pima Cotton, 30% Upland Cotton,” the non-required phrase “Pimalux Towel” must be separate from the fiber content statement, and must not interfere or detract from it, or be false or deceptive.

- If non-required information includes the word “cotton,” the name of a type of cotton, a cotton trademark, or other term implying the presence of a type of cotton, the required fiber content information must be repeated the first time the word “cotton,” the name of a type of cotton, the cotton trademark, or the term implying the presence of a type of cotton appears in the non-required information. For example, if the required information says “70% Pima Cotton, 30% Upland Cotton” and you want to attach a hangtag to the product containing the non-required information “Pimalux Towel,” then the hangtag must read: “Pimalux Towel (70% Pima Cotton, 30% Upland Cotton)” the first time “Pimalux” appears on the hangtag. Or if the required fiber content statement says “50% Pima Cotton, 50%

Upland Cotton,” and you want to attach a hangtag to the product containing the non-required information “Fine Pima Blend Fabric,” then the hangtag must read: “Fine Pima Blend Fabric (50% Pima Cotton, 50% Upland Cotton)” the first time “Pima” appears on the hangtag.

- If your ad uses the name of a particular type of cotton, a cotton trademark, or other term implying the presence of a type of cotton, the cotton name, trademark, or other term should also be included on the product’s content label.

## **Written Advertisements**

- An ad doesn’t have to mention a product’s fiber content or include the name of a particular kind of cotton, cotton trademark, or other term implying the presence of a type of cotton. However, if it does, it also must include the required fiber content information with fibers listed in order of predominance by weight. But the percentages of fibers don’t have to be included. For example: “Fine Pima Blend Fabric (Pima Cotton, Upland Cotton)” is permissible in an ad for a product whose label reads “90% Pima Cotton, 10% Upland Cotton,” and “Pimalux Towel (Pima Cotton, Upland Cotton)” is permissible in an ad for a towel whose label reads “70% Pima Cotton, 30% Upland Cotton.” All required fiber information must appear together in the ad in type of the same size and conspicuousness — one that’s reasonably easy to read.
- Any reference in an ad to fiber content, including the name of a particular kind of cotton, a cotton trademark, or other term implying the presence of a type of cotton, must not be false, deceptive, or misleading as to fiber content.

## **For More Information**

For inquiries or to get a copy of the Textile Act or Rules, and the FTC business guide *Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts*, contact: Consumer Response Center, Federal Trade Commission, Washington, DC 20580; toll-free: 1-877-FTC-HELP (382-4357); TDD: 202-326-2502. Or visit the FTC at [www.ftc.gov](http://www.ftc.gov).