

## Wedding Gown Labels: Unveiling the Requirements

**H**ere comes the bride-to-be, shopping for the perfect dress for her big day. Her main focus may be on style and price, but it's likely she also wants to know about the manufacturer, fiber content, country of origin and care instructions. Today's bride wants this labeling information to help make a smart choice about what is surely to be one of the most memorable — and expensive — clothing purchases of a lifetime. What's more, this labeling information is required.

### GARMENT LABELS

If you manufacture, import or sell wedding gowns, you must ensure that consumers have certain garment information. The Textile Act, its regulations and the FTC's Care Labeling Rule require that labels be attached to imported and domestic textile products such as wedding gowns. These rules apply to sample gowns, as well as to gowns that are for sale. Wedding gown labels must contain four pieces of information:

#### **1. The identity of any one business in the distribution channel, including:**

- the manufacturer;
- the manufacturer's Registered Identification Number (RN), which is issued to companies in the U.S. and registered by the FTC;
- the retail store's name or RN; or,
- the RN or business name of any other company in the U.S. directly involved in the distribution of the gown.

# Facts for Business

The label showing the name or RN may be sewn-in or attached as a hang-tag. Either way, it must be conspicuously placed.

## 2. The garment's fiber content.

The generic fiber names and percentages by weight of each fiber used must be listed in descending order of predominance. The label may be sewn-in or attached as a hang-tag and must be conspicuously placed. It may appear with other information or it may be a separate label. To insure proper care of the garment, it may be important — although not required — to have the fiber content on a label that is permanently attached.

## 3. The country of origin.

Imported wedding gowns must identify the country where they were processed or manufactured.

- Gowns made entirely in the U.S. of materials also made in the U.S. must be labeled “Made in U.S.A.” or an equivalent phrase.
- Gowns made in the U.S. of imported materials must be labeled to show the processing or manufacturing that takes place in the U.S., as well as the imported component.
- Gowns manufactured partly in the U.S. and partly abroad must identify both aspects.
- If a gown is imported, the country-of-origin label must be sewn in to comply with U.S. Customs Service requirements. If a gown is made in the U.S. — of either imported or domestic fabric — the country of origin information can be sewn in or placed on a hang-tag. In any case, the country-of-origin disclosure must be placed as close as possible to the center back of the neck.

## 4. Care instructions.

The care label must identify:

- At least one safe cleaning method — either washing or drycleaning — and any necessary warnings about the cleaning method.

- Example: If the care instruction is to dryclean, the label must specify one type of solvent that may be used, unless all commercially available types of solvents can be used safely on the gown.
- Example: If the gown is labeled for washing, the label must say whether any step of the normal washing process — washing, bleaching, drying, or ironing — could harm the garment or other items cleaned with it.

The care label must be sewn in. Imported garments should have care labels when they are sent to the U.S., or labels should be attached by the importer.

## TAG OMISSION, REMOVAL AND SUBSTITUTION

A wedding gown must have all the required labeling information when it leaves the manufacturer.

Under the Textile Act, it is illegal to remove a label containing manufacturer, fiber content or country-of-origin information without substituting another label with the required information. For example, a retailer who wants to remove a label identifying the manufacturer, must substitute it with a label that lists the shop's own name or RN, or the name or RN of someone else in the gown distribution chain. In addition, the substituted label must contain all the information that is required on the original label. All substitute labels must be properly attached to the gown — either sewn in or on a conspicuously placed hang-tag. Finally, a retailer must not remove the sewn-in care instructions.

## RECORD KEEPING

Wedding gown manufacturers must keep records that show the information required on the label (manufacturer or dealer identity or RN, fiber content, and country of origin) for every garment they produce. The records, which must be kept

for three years, should show that the letter of the law has been met and establish a traceable line from the raw materials to the finished product.

In addition, any business that substitutes a label on a textile product — such as a wedding gown retailer — also must keep records for three years that show what information on the label was removed and the name of the party from whom the product was received.

### NON-COMPLIANCE

Any violation of the Textile Act regulations or the Care Labeling Rule is considered an unfair and deceptive act or practice under the FTC Act. As a remedy, the Commission may issue an administrative order prohibiting the unlawful behavior. Violations of an administrative order can result in a federal district court action for civil penalties up to \$16,000 per violation. Businesses not subject to a previous administrative order also can be subject to monetary civil penalties, an injunction, and other remedies — including consumer redress — in a federal district court action for knowingly engaging in practices — such as mislabeling garments — that the Commission has determined in prior cases to be unfair or deceptive.

For violations of the Care Labeling Rule by a manufacturer or importer, the Commission may seek an injunction in federal district court and civil penalties of up to \$16,000 per violation. A retailer

who removes care labels from garments may be held liable for unfair and deceptive acts or practices under the FTC Act and may be the subject of an administrative order. Violations of such orders can result in an action for civil penalties in federal district court.

Each instance of mislabeling under the textile laws and the Care Labeling Rule may be considered a separate violation.

### FOR MORE INFORMATION

To learn more about textile labeling requirements and care labels, see **Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts** and **Writing a Care Label**. For your copy, contact the Consumer Response Center, Federal Trade Commission, Washington, DC 20580, 1-877-FTC-HELP (1-877-382-4357), or visit us at [www.ftc.gov](http://www.ftc.gov) on the Web.

### YOUR OPPORTUNITY TO COMMENT

The National Small Business Ombudsman and 10 Regional Fairness Boards collect comments from small businesses about federal compliance and enforcement activities. Each year, the Ombudsman evaluates the conduct of these activities and rates each agency's responsiveness to small businesses. Small businesses can comment to the Ombudsman without fear of reprisal. To comment, call toll-free 1-888-REGFAIR (1-888-734-3247) or go to [www.sba.gov/ombudsman](http://www.sba.gov/ombudsman).



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