

ORGANIC TRADE ASSOCIATION BEST LABELING PRACTICES FOR TEXTILES

WHY THIS IS IMPORTANT

Many consumers have come to trust and understand that organic products are 3rd party certified to strict standards and regulated and enforced by the federal government. However, organic claims made on products such as processed fiber and textiles, personal care products and dietary supplements are outside of USDA NOP's scope of enforcement and therefore go unregulated and enforced. The Federal Trade Commission (FTC) has authority to act on misleading or fraudulent "organic" claims, but historically has not acted with the understanding that the responsibility belongs with USDA's National Organic Program (NOP). This creates a gap in the oversight system, creates unfair competition, negatively affects the success and growth of legitimately certified organic products, and can disenfranchise consumers in their ability to trust organic labels in general.

Consumers need assurance in the USDA organic label and certified organic brands need confidence in fair market conditions. The formal release of best labeling practices will promote and optimize compliant and truthful labeling and encourage leadership by companies committed to consumer trust. It will also educate new comers that may not know otherwise and will apply pressure on those that do. Ultimately it will support our members and lead the charge in stamping out misleading organic claims.

BEST LABELING PRACTICES FOR TEXTILES

The end goal is the establishment of best labeling practices that will apply to **all non-food categories** that are outside of NOP's scope of authority. As a starting point, and a prototype to work from, **Best Labeling Practices for Textiles** were drafted, and then endorsed by the Organic Trade Association's Fiber Council and formally adopted by our Board of Directors in February 2019. The document reflects the labeling guidelines we have consistently asked FTC to adopt over the years. In summary:

- ⇒ The use of term "organic" when used to modify a **PRODUCT** name (i.e. organic mattress, organic shampoo, organic lotion) should be reserved for NOP certified products only, OR, products produced and certified in accordance with a USDA accredited and NOP recognized standard when NOP standards do not exist (i.e. Global Organic Textile Standard)
- ⇒ Organic claims made on products that are **not certified**, as described above, should be limited to **CONTENT** claims only, and should not imply product certification
- ⇒ Organic **CONTENT** claims should clearly state "contains organic XX" and should not appear on the principle display panel of a product
- ⇒ Organic **CONTENT** claims may only apply to NOP certified ingredients/products

BACKGROUND: ORGANIC TRADE ASSOCIATION ACTION

For the past 8 years, the Organic Trade Association has been meeting regularly with FTC and USDA-NOP:

- Submitted multiple rounds of comments urging FTC and NOP to develop a policy on use of the term "organic" on products outside of NOP's scope of enforcement & update the FTC "Green Guides"
- Prompted FTC & USDA to launch a survey and convene an expert panel exploring consumer perception of organic claims on fiber/textile and other non-food products
- Participated in the panel and conducted a consumer survey in preparation

In late 2017, after years of pressing, FTC took its first action ever against a mattress company making misleading "organic" product claims. Although we commend FTC for taking this action against the deceptive use of the word "organic," FTC and USDA have yet to respond to our larger request and develop formal policy that is incorporated into its Green Guides. The lack of adequate response and the lack of consistent enforcement and/or guidance calls on the private sector to develop the following best labeling practices.

BEST LABELING PRACTICES FOR TEXTILES

The Organic Trade Association strongly discourages the use of organic claims on textile products, such as clothing, mattresses, towels, etc. unless the product is third-party certified to the USDA National Organic Program (NOP) regulations, the Global Organic Textile Standard (GOTS) or the Textile Exchange's Organic Content Standard (OCS). We also object to any organic claim made on a processed fiber or textile product that implies or leads the consumer to believe the final product is **certified organic** when it is not. In order to avoid misleading and/or inaccurate organic claims on textile products, the Organic Trade Association recommends the following best labeling practices:

- USDA regulates the term “organic” as it applies to agricultural products through the NOP Regulation, 7 CFR Part 205. Raw natural fibers, such as cotton, wool, and flax are agricultural products and are covered under the NOP crop and livestock production standards. The NOP regulations do not include specific processing or manufacturing standards for textile products. However, in keeping with NOP’s inclusive scope policy, any textile product produced and certified in full compliance with the NOP production and handling regulations may be labeled as NOP certified organic and may use the USDA organic seal. [NOP’s Policy on the Labeling of Textiles That Contain Organic Ingredients](#)

For example: Organic cotton balls



- The Organic Trade Association considers the [Global Organic Textile Standard \(GOTS\)](#) to be the practical option and gold standard in certification for textiles processed from organic raw fibers. Through a rigorous 3rd party certification process, GOTS ensures organic status of textiles, from harvesting of raw materials, through environmentally and socially responsible manufacturing up to labeling in order to provide a credible assurance to the end consumer.
- The Organic Trade Association supports and encourages **organic PRODUCT certification** under the Global Organic Textile Standard (GOTS). As such, use of the term “organic” to modify the *name of a product* (e.g. organic mattress, organic sheets, organic towels, organic t-shirt, etc.) should be limited to products that are GOTS certified or NOP certified (if possible).

For example:

Claim: *Organic Cotton Apparel* - Product should be GOTS certified

Claim: *Organic Mattress* – Product should be GOTS certified



- The Organic Trade Association supports and encourages **organic CONTENT claims** to be certified under the [Textile Exchange \(TE\) Organic Content Standards \(OCS\)](#). The goal of the OCS is to ensure trust in organic content claims by verifying the presence and amount of organic material in the final product.

For example:

Apparel: Contains 65% organically grown cotton – Should be certified to the Organic Blended Content Standard

Linen/Sheets/Bedding: Contains 100% organically grown cotton – Should be certified to the OCS 100



- Organic claims made on processed fiber and textile products that are **not certified** to one of the above standards should be limited to “content” claims about the raw fiber only and should not imply product certification. **The USDA Organic Seal, the GOTS Logo and/or the TE seals MUST NOT BE USED.** The following wording is recommended:

Correct examples (use the term “contains XX” and “organically grown....”):

- Contains 70% organically grown cotton
- Contains organically raised wool

Incorrect examples (avoid the terms “made with” and “certified” – both of which are regulated by NOP)

- Made with organic cotton
- GOTS certified organic cotton
- Made using organic cotton