



## OTA ADVOCACY: ORGANIC FIBER AND TEXTILES

### GLOBAL ORGANIC TEXTILES STANDARD

**IWG:** The International Working Group (IWG) on the [Global Organic Textile Standard](#) (GOTS) is comprised of the Organic Trade Association (OTA) (North America), The Soil Association (UK), International Association Natural Textile Industry (IVN) (Germany), and the Japan Organic Cotton Association. Each of these associations introduced their own textile standard previous to the development of GOTS, and tapped their knowledge and experiences to work together on the joint project. IWG is the decisive committee for all relevant organizational, structural and political issues. **Marni Karlin**, OTA's VP of Government Affairs and Legal Counsel, serves as OTA's designated IWG member.

**Technical Committee:** The Technical Committee is in charge of generating revisions of the standard and issue interpretation documents, developing the quality assurance system, and supervising its implementation. Committee members are made up of one expert appointed by each party of the IWG and the GOTS Technical Director. **Gwendolyn Wyard**, OTA's Regulatory Director of Organic Standards and Food Safety, serves as the GOTS Technical Committee Representative for North America.

Through its participation as an IWG member and work on the Technical Committee, OTA actively participates in the continued development and advocacy of GOTS, and ensures that any changes or other relevant actions are communicated to and supported by OTA members.

### NATIONAL ORGANIC PROGRAM (NOP) POLICY MEMO 11-14

On May 20, 2011, NOP announced a [Policy Memorandum](#) addressing the labeling of textile products containing organic ingredients (such as organic cotton, organic wool, and organic linen). This NOP Policy Memo 11-14, entitled "Labeling of Textiles that Contain Organic Ingredients," clarifies that while NOP regulations do not include specific processing or manufacturing standards for textile products, a product can be labeled as "organic" and make reference to NOP certification if it is produced in full compliance with both the NOP production standards (crops and livestock for raw materials) and the NOP handling standards (processing for the finished product). However, as most of these methods and ingredients are not applicable to textile processing, NOP labeling is likely unachievable for most garments and textile products that use a variety of dyestuffs and auxiliary agents.

As a practical alternative, the policy memo explicitly confirms that textile products produced in accordance with GOTS, such as apparel, mattresses, or socks, may be sold as "organic" in the United States, although they may not refer to NOP certification or carry the USDA Organic seal.

OTA is working to ensure that NOP's Policy is visible to the entire fiber and textiles industry, understood, and followed. To this end, OTA is working with NOP on carrying out minor revisions to improve its clarity. OTA has also requested that the Federal Trade Commission (FTC) formally recognize NOP's Policy Memo and, in doing so, update its "Green Guides" to communicate the policy to marketers of fiber and textiles. For more information, see "Enforcing the Use of Organic Claims on Processed Fiber and Textiles."

## **ENFORCING THE USE OF ORGANIC CLAIMS ON PROCESSED FIBER AND TEXTILES**

On May 27, 2014 OTA filed [comments](#) to the Federal Trade Commission (FTC) regarding its notice and request for comment on its proposed plans to conduct research to explore consumer perception of environmental marketing claims such as “organic” and “pre-consumer recycled content.” The study is intended to enhance FTC’s understanding of how consumers interpret such claims in order to decide whether to recommend revisions to the “[Green Guides](#).” It could ultimately provide FTC with increased understanding on when and how to act on the fraudulent use of the term “organic” on non-food products such as mattresses, t-shirts, and other similar products that fall outside of the U.S. Department of Agriculture’s (USDA) National Organic Program (NOP) scope of enforcement authority.

OTA's [comments](#) to FTC focused on "organic" product claims and the need for FTC enforcement action on the inaccurate, misleading, or fraudulent use of the term “organic” when used on products that fall outside of NOP’s jurisdiction. Many consumers have come to trust and understand that organic products are certified to strict standards, and that those claims are regulated and enforced by the federal government. However, USDA NOP does not regulate or enforce organic claims made on certain types of products, such as processed fiber and textiles. This leaves a major gap in the system. Consumers need to trust products that are labeled as “organic” whether they are sold in the food aisle or the personal care aisle of a retail outlet. Failure to enforce the use of the term “organic” on all products creates consumer confusion, can be misleading, and can lead to consumers mistrusting the integrity of the word “organic.”

OTA urged FTC to confer with NOP and develop an enforcement policy on the use of "organic" claims, and exercise its consumer protection authority to act on misleading and/or fraudulent use of the term “organic” when used on products outside NOP’s jurisdiction. OTA expressly requested that FTC acknowledge GOTS, defer to NOP’s Policy Memorandum on Textiles, and monitor and enforce the use of the term “organic” on textiles not certified either under NOP or GOTS. For products that are making organic content claims only, OTA requested that FTC include reference to the Textile Exchange [Organic Content Standard](#)<sup>1</sup>.

## **IMPORTED COTTON: SECURING AN ALTERNATIVE TO METHYL BROMIDE**

OTA has taken a leadership role in finding an alternative quarantine treatment for organic cotton imported into the United States. USDA-APHIS (Animal & Plant Health Inspection Service) requires imported cotton to be fumigated with methyl bromide as a condition of entry into the United States. The Global Organic Textile Standards (GOTS) recently included a derogation that allowed the application of legally required treatment of raw materials otherwise prohibited (such as methyl bromide). The derogation, however, expired in the revised GOTS 4.0 standard released in March 2014. GOTS certified operators are now operating under a one-year implementation period. All companies participating in GOTS certification system must comply with all criteria of GOTS Version 4.0 by March 2015 at the latest. At that time, any raw agricultural organic cotton treated with methyl bromide cannot be used in GOTS certified products.

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<sup>1</sup> The Organic Exchange “organic content” standards are chain-of-custody standards that give third-party verification to a final product containing a given amount of organically grown cotton. The OE 100 and OE Blended are voluntary standards that do not address the use of chemicals or any other aspects of production beyond the integrity of the organic fiber used.

Recognizing the long-time need for an alternative, OTA met with APHIS to discuss the potential use and approval of an alternative technology to treat organic cotton imported into the United States. A representative from a Netherlands-based company called Ec02 traveled to the United States to present its Controlled Atmospheric technology. APHIS was extremely impressed by the presentation and is now actively participating in efforts to move forward with its approval provided Ec02 can meet the required efficacy testing for quarantine treatment. USDA has drafted a proposal to Ec02 for testing the technology in order to demonstrate that it would be a suitable alternative to methyl bromide. Ec02 wants to move forward with testing and is able to fund 50% of the research. **An additional \$12,000 is needed.** The research would take 16 month beginning this winter and continuing through 2015 in both Greece and California.

Finding an alternative to methyl bromide is a top priority for USDA under obligations of the Montreal Protocol on Substances that Deplete the Ozone Layer and the Clean Air Act. OTA is working closely with Ec02 and APHIS to ensure that an accepted protocol for efficacy testing is in place and conducted. An acceptable alternative to methyl bromide would be a highly visible accomplishment for both for APHIS and OTA, and could potentially open the door for future application and approval for other commodities of concern.

### **OTA'S ORGANIC COTTON SURVEY**

Each year, OTA produces a report on domestic organic cotton production in partnership with Cotton, Inc. OTA has collected information on organic cotton production in the U.S. since 2001. The annual U.S. Organic Cotton Production & Marketing Trends is made available at no cost in January via OTA's Web site. **The most recent report can be found here:**

<http://www.ota.com/pics/documents/2012-2013-Organic-Cotton-Report.pdf>

*For additional information, contact [Gwendolyn Wyard](#), OTA's Regulatory Director, Organic Standards & Food Safety.*

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