

June 2, 2015

Office of the Secretary
Consumer Product Safety Commission
Room 820, 4330 East West Highway
Bethesda, MD 20814

RE: Docket No. CPSC-2006-0011: Review of the Standard for the Flammability Open Flame of Mattress Sets

Dear Consumer Product Safety Commission:

The Organic Trade Association (OTA) and the Global Organic Textile Standard Advisory Council thank the Consumer Product Safety Commission for its work on creating the Standard for the Flammability Open Flame of Mattress Sets, and specifically thanks the Committee for considering our comments on sustainability and safety.

OTA is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states including more than 100 organic fiber businesses. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

The Global Organic Textile Standard (GOTS) Advisory Council was formed to define globally recognized requirements that ensure the organic status of textiles. GOTS is the stringent voluntary global standard for the entire post-harvest processing (including spinning, knitting, weaving, dyeing and manufacturing) of apparel and home textiles made with organic fiber (such as organic cotton and organic wool). Key provisions include a ban on the use of genetically modified organisms (GMOs), highly hazardous chemicals (such as azo dyes and formaldehyde), and child labor, while requiring strong social compliance management systems and strict waste-water treatment practices. OTA is a founding member of GOTS along with the Japan Organic Cotton Association, International Association Natural Textile Industry (Germany), and Soil Association (UK).

OTA and GOTS do not support regulations that cause organic (cotton) fabrics to be treated with toxic flame retardant chemicals. Treatment of organic fiber products with such chemicals is in conflict with the requirements of GOTS, and accordingly, negatively impacts the organic fiber marketplace and organic agriculture as a whole. Responsible flammability regulations must not be designed to discourage the use of less flammable, and sustainable, natural and organic materials. Furthermore, regulations should not encourage the need for chemical flame retardants in order to allow natural fibers to pass smolder tests. This does not lead to safer products. Instead it will increase the use of such chemicals in both organic surface and barrier fabrics and organic products in general while creating an unnecessary burden on organic fiber businesses.

We acknowledge that cotton products, including organic cotton products—which are the primary type of organic products—are not smolder-resistant, and the most effective but also most toxic finishing auxiliaries available to increase the smolder-resistance fail the corresponding GOTS requirements related to (human) hazards and toxicity. Accordingly, a product made with organic cotton fabric over organic cotton fill – even if treated with acceptable flame retardants—will likely fail smoldering standards. However, natural fibers release less heat than their petroleum-based counterparts, and the reduction of heat released allows them to be used safely *without the addition* of flame-retardants. Natural fibers by their nature smolder and char, but this smolder is not likely to lead to a flame. Organic cotton fiber, for example, does not burn well, but will blacken and char when exposed to a flame source. The heat release from this charring remains low.

The underlying issue is *flammability*, not smoldering characteristics. It is the *polyurethane* foam-filled products—not the organic cotton-filled products—that represent the more flammable environment. Compared to highly flammable petroleum-based materials, natural fibers such as organic cotton offer a lower fuel load, meaning lower heat release in the case of a fire. Exposed to heat sources, natural fibers take much longer to erupt into open flame and have much lower heat release than petroleum-based materials. In fact, natural materials largely meet open flame testing without the need for flame retardant chemicals. **Natural materials such as organic cotton that can pass an open flame standard like 16 CFR 1633 and can do so without the need for flame retardant chemicals should be allowed to do so without any further requirements.**

In conclusion, OTA supports the growth of the organic textiles marketplace, and opposes initiatives to restrict that growth when substantial benefits of taking restrictive actions are not proven. Organic fiber products offer the best hope of finding products free of toxic flame-retardant chemicals. Consumers increasingly are looking to eliminate such chemicals from their household furnishings. Smoldering requirements reduce the availability of products that are free of toxic flame-retardant chemicals while not increasing overall safety to consumers. In addition, such requirements negatively impact the organic fiber marketplace at a time when certification to GOTS by companies around the world is soaring—growing 18% from 3,085 facilities in 2013 to 3,663 facilities in 2014. This growth is driven by consumers who are demanding ecologically and socially responsibly processed textiles and companies that are searching for tools to make their supply chains more sustainable.

Again, on behalf of our organic textile members across the supply chain and the country, thank you for the opportunity to comment on this important topic.

Respectfully submitted,

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