

IDFL NEWS

Issue No. 11

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USA - FTC GUIDELINES

The Federal Trade Commission Guide for Down and Feather Products is the document that guides the labeling of down and feather products in the USA.

CURRENT FTC GUIDELINES

The current FTC "Guides" were developed in 1971 and contain guidelines for the following:

1. Down & Feather Definitions.
2. Misrepresentation in General.
3. Use of Trade Names, etc.
4. Misuse of Tan-O-Quil-QM
5. Disclosure of Filling Material.
6. Tolerances in Filling Material
7. Crushed Feathers
8. Damaged Feathers
9. Secondhand Filling Material
10. Cleanliness of Filling Material
11. Disclosure as to Size.

PROPOSED CHANGES IN THE FTC GUIDELINES

As part of ongoing FTC review, several changes are proposed:

1. **Misrepresentation and use of Trade Names, etc.**
Replace outdated language.
2. **Tan-O-Quil-QM.** Dropping this guideline altogether.
3. **Test Methods.** Allowing IDFB ABFLO & other test methods.

4. **Cleanliness.** Revising the maximum oxygen # to 10.

5.. **Size.** Elimination of this section because of state laws.

ADDITIONAL POSSIBLE CHANGES TO FTC GUIDES

1. **Damaged Feather.** Add new IDFB definitions & tolerances.

2. **Fill Power / Warmth Factor.** The FTC is considering adding a section about Fill

Power or warmth factor. (Fill Power is **not** part of current FTC Guidelines)

3. **Landfowl.** Reduce the tolerance from 8% to 2-4% for waterfowl feather products.

4. **Tolerances in Filling Products.** The FTC is considering raising the minimum down for "DOWN" to 75% or changing labeling to more accurately describe products. (See below:)

TOLERANCES IN FTC GUIDELINES

| Current FTC Label | Current FTC Minimums | | Possible FTC Changes |
|-------------------|----------------------|------------|---|
| | Down | Down-Fiber | |
| Down | 70% | 80% | No change (or) raise down min. to 75% (or) Change label as follows DOWN (min of xx% down) |
| 90% Down | 63% | 72% | No change (or) possible new label: DOWN & FEATHERS (minimum of xx% down) |
| 80% Down | 56% | 64% | |
| 70% Down | 49% | 56% | |
| 50% Down | 35% | 40% | No change (or) possible new label FEATHERS & DOWN (minimum of xx% down) |
| 10% Down | 7% | 8% | |
| 5% Down | 3.5% | 4% | |

xx = actual down percentage

| Other Guidelines | Current Rule | Possible new rule |
|-----------------------------|-----------------|-----------------------|
| Goose on Label | Min 90% Goose | No proposed change |
| Quill Feathers | None allowed | No proposed change |
| Landfowl (down products) | Max 2% | No proposed change |
| Landfowl (feather products) | Max 8% | Max 2-4% |
| Damaged feathers allowed | Max 2% of Total | Max 7-10% of feathers |
| Residue | Max 2% | No proposed change |

SPECIE PROBLEMS

During 1997, IDFL has noticed an increase in the number of goose samples where the duck is higher than expected.

In some cases raw material has tested 95-100% goose **feather** but only 50-80% goose **down**. The problem could be related to supply shortages in Asia.

IDFL welcomes information that confirms or contradicts our experience in specie trends.

Unidentified Specie.

If a down or feather specie cannot be identified -- how should it be classified? In the USA it is classified as goose.

Unidentified specie could be classified in 3 possible ways:

1. Classify as goose.
2. Classify with specie majority.
3. Classify separately as "unidentified specie".

Research on Specie Methods.

IDFL is working with IDFB on more accurate specie testing methods such as:

1. Double testing
2. Larger sample size.
3. Unidentified Classification.

MYTH #1

DOWN PILLOWS CAUSE DUST MITE ALLERGY

For years, feather and down products have been accused of harboring dust mites and causing allergy problems.

Research done by several institutes have shown that dust mites do not easily penetrate

downproof fabrics and do not feed on the feather particles.

Dust mites are found on the outside surface of all household material (carpet, drapes and bedding.)

Regular care and cleaning of down and feather products help keep the fabric and filling material dust free and retain fill power.

MYTH #2

SYNTHETIC PILLOWS CAN REDUCE DUST MITE ALLERGY PROBLEMS

A new study published in the October 12, 1996 issue of the "**BRITISH MEDICAL JOURNAL**" show that **synthetic pillow surfaces have three times** more dust mite allergen than down and feather pillows.

It is not certain if synthetic fillings retain more allergen or support greater dust mite infestation.

The research was completed by the Wellington Asthma Research Group, Department of Medicine, Wellington, New Zealand.

CONTENT ANALYSIS (COMPOSITION) DOUBLE / SPLIT TESTING

Both Japanese (JIS) and German (RAL) methods require two separate composition tests.

The JIS system requires two tests of 3g each. The RAL system requires two tests of 5g each.

IDFL is researching double or split testing of the IDFB method. The International IDFB method requires a single test of 4g for down and 6g for feathers.

Double testing was tried on about 100 samples. This requires two tests of 4g or 6g each.

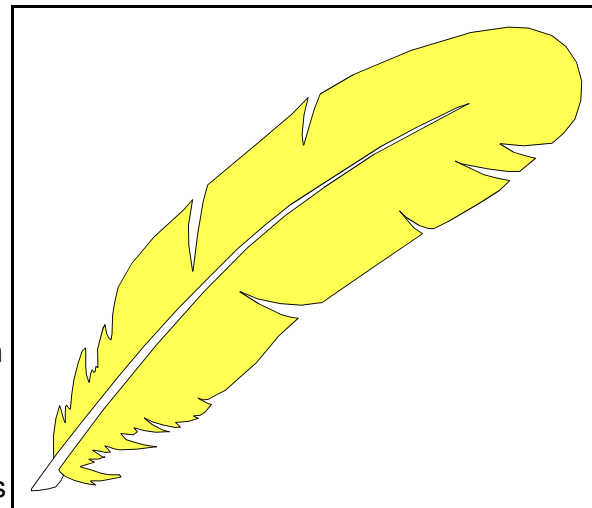
Split testing was completed for over 2,000 samples. The "split" test divides the 4g/6g original sample into two 2g/3g samples.

Our findings show that the average result of both double testing and split testing yield a more accurate content analysis result.

IDFL will split-test all samples which require the International IDFB content analysis test. If the split tests yield significantly different results a 3rd test will be completed.

IDFL CONTINUES TO BE AN IDFB "RECOGNIZED LAB"

IDFL has again met the criteria for acceptance in 1997 as an recognized lab of the IDFB (International Down and Feather Bureau) in Frankfurt, Germany.



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