

**ADDITIONAL QUESTIONS FOR THE CHINA LECTURE**  
(We will answer as many of these questions in the lecture as time permits.)

- 1. When is the absolute deadline for the new USA labeling standards?**  
After June 1, 2001 no products may be sold to consumers with the old label.  
However, in California, deadline is January 1, 2001.
- 2. Has the FTC approved the new USA label standards?**  
The FTC has already published what it deems reasonable for down and feather labeling standards. The USA/ADA standards meet the FTC expectation.

The FTC expects ABFLO, ADA and other industry groups to develop details for standards. The FTC will not object to such standards as long as they fall within the expectations outlined in the January 1999 brochure, "Advertising and Labeling of Feather and Down Products."
- 3. Have individual states changed their labeling laws?**  
Several states have begun the process to change down and feather laws.  
California has adopted its new regulation in place in April 2000. Other states are working on regulations and policy changes that should be effective for products sold after June 1, 2001.
- 4. What is the minimum down required for the "DOWN" label?**  
The new standard requires 75% minimum clusters (down clusters, nestling down and plumules) for products labeled "DOWN." No further tolerance is allowed.

## **ADDITIONAL QUESTIONS AND ANSWERS - USA STANDARDS (continued)**

**5. What is the tolerance allowed for down and feather "BLENDS"?**

No tolerance is allowed for blended products. Products labeled "50% DOWN / 50% FEATHER" must have a minimum of 50% down (clusters).

**6. Can down fiber be included in the "Minimum Required Clusters"?**

No. The old FTC guidelines had a requirement for minimum total down (clusters) & down fiber. The new standards do NOT include down fiber in the down (cluster) calculation. Only down clusters, nestling down and plumules are included in the down calculation.

**7. Do the standards apply to both bedding & garments (jackets, etc.)?**

Generally, the standards for filling material apply to both bedding and garments. Each state has individual regulations on what kind of label is required for bedding vs. garments. In most states the larger, legal hanging tag is required only for bedding. In garments, the down filling content can be listed on the normal collar or side label. Please check with individual states on current requirements.

The International Sleep Products Association (ISPA) publishes an annual list of state and federal regulations for bedding products: *"1999 Manual of Labeling Laws & Registration Requirements."* Please order from:

ISPA, 501 Wythe Street  
Alexandria, VA 22314-1917 USA

## ADDITIONAL QUESTIONS AND ANSWERS - USA STANDARDS (continued)

### 8. Why do feather and down products not use the normal FTC textile standards?

The normal FTC Textile Standard allows only a 3% tolerance. This means that a product labeled "DOWN" would require 97% down to meet the normal FTC textile labeling guides.

The FTC agrees that down and feathers need special guidelines. However, if reasonable labeling standards are not adopted, the FTC might enforce the normal textile standards.

### 9. What is the purpose of the sub-label in the USA/ADA standard?

The new USA/ADA standard allows four general categories in the label:

**DOWN**

**FEATHERS & DOWN**

**DOWN & FEATHERS**

**FEATHERS**

These labels would be used to generally describe products. These terms could be used in **advertising and marketing** of products.

The SUB-LABEL allows consumers and retail buyers to distinguish between different qualities of product within a general category.

For example, with the proposed sub-labeling two products might be labeled:

**DOWN**

(Minimum Down 90%)

**DOWN**

(Minimum Down

75%)

Both products are "DOWN" but the 90% product is normally a better product.

## **ADDITIONAL QUESTIONS AND ANSWERS - USA STANDARDS (continued)**

**10. Is the sub-label for "DOWN" products optional or required?**

The current USA/ADA standard requires sub-labels for "DOWN" products. products.

**11. Why has the minimum allowance for damaged feathers increased?**

The old FTC requirement of no more than 2% damaged feather was fine for down products, but unrealistic for high feather content products.

The International Down and Feather Bureau (IDFB) completed a study which determined that a 7-9% allowance (of the feather portion) for damaged feathers is realistic.

**12. What about threadcount and downproof claims?**

Threadcount and downproof claims fall under normal FTC guides for textiles and honest advertising. Threadcount claims should have no more than 3-5% tolerance. The use of double- yarn to double threadcount is not accurate. (There is disagreement about double yarns)

**13. What about "hyper-clean" or "super-clean" or "hypo-allergenic" claims?**

The FTC requires that such claims be carefully documented.

## **ADDITIONAL QUESTIONS AND ANSWERS - USA STANDARDS (continued)**

### **14. What if a product has more than 10% down or feather fiber?**

The new USA standard requires that if down or feather fiber exceeds 10%, such fiber must be listed separately on the label. Single fibers are inferior to down or feathers.

An example label for a product exceeding the fiber minimums would be:

#### **DOWN & FEATHERS**

Down 60%

Feathers 25%

Feather Fiber 15%

### **15. Why is the oxygen number standard more strict than before?**

The majority of products produced in the USA are below a 10 oxygen. Most of industry and government feel that a tightening of the rule was acceptable.

### **16. How does the new USA labeling standard compare to other countries?**

**JAPAN** Similar to the new USA standard. Japan includes Fill Power on the label.

**CHINA** The Chinese have a standard close to the new USA standard.

**CANADA** Canada has always required 75% for down products.

**EUROPE** The new European labeling standard is more strict than the old European. Europe's new label will contain more information than the new USA label.

## **ADDITIONAL QUESTIONS AND ANSWERS - USA STANDARDS (continued)**

**17. What are the official USA test methods?**

The new USA standards require the IDFB test methods. The IDFB test methods have been recently reviewed by IDFL and Hohenstein Institute. As the consulting lab to the International Down and Feather Bureau, IDFL has spent years researching and refining test methods.

**18. Is there a USA standard for Fill Power?**

Fill Power is not required on the law tag label. However, if fill power is used in advertising or packaging materials, the accepted tolerance for fill power is  $\pm 5\%$ . The official IDFB fill power method uses the Lorch machine. IDFL has tested 1,000 samples with both the USA cylinder and the Lorch machine. The variance between the two cylinders is 0.4%.

**19. What about testing tolerances or manufacturing variances?**

ABFLO and ADA agree that the average results of multiple tests of a product must meet or exceed the label. However, a single test result for a product may have a small variance.

**20. What is the penalty for mis-labeling down products?**

Each individual state has separate regulations for action against manufacturers and retailers. The FTC may also initiate action.

In the past, manufacturers/retailers have been fined and been subject to court action or products have been removed from shelves.