

## Apparel Label Regulations

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In response to requests from NAUMD members for information regarding clothing labeling requirements under federal law, we had Chwat & Co. contact the following federal agencies: U.S. Customs and Border Protection, the Department of Commerce & The US Federal Trade Commission (FTC) and collected information on applicable laws regarding Apparel Labeling regulations, standards and practices. The following are general rules and regulations for your use in labeling of all apparel in both the creation of uniforms and imagewear.

### **1. Federal Trade Commission Act**

#### **a. Care Instructions**

##### **Clothes Captioning: Complying with the Care Labeling Rule** (ftc.gov)

Labels for clothing must have a washing instruction or a drycleaning instruction. If the item can be washed and drycleaned, the label needs only one of these instructions. However, you may want to consider that consumers like having washing instructions for items that can be washed. If you prefer, you can give instructions for both washing and drycleaning.

Sometimes, because of the particular combination of components, a garment can neither be safely washed nor drycleaned, but the manufacturer nevertheless wishes to market it. The label on such a garment must say "Do not wash - Do not dryclean."

We recommend, but don't require, that the terms defined in the Rule's glossary be used when applicable.

The care symbols from the American Society for Testing and Materials (ASTM) designated as ASTM Standard D5489-96c, Standard Guide for Care Symbols for Care Instructions on Textile Products, may be used in place of words, but the symbols must fulfill the requirements of the Rule. These symbols are also very similar but not identical to the symbols designated as an international standard by the International Standards Organization (ISO) that are used in many European countries. Only the ASTM symbols have been approved for use in the United States. The system used in Europe does not provide symbols for all the information required by the Care Labeling Rule. The U.S. representatives to the ISO are working to add the necessary symbols to the international standard and to harmonize the international standard with the ASTM standard.

#### **b. Washing Instructions**

##### **One: Washing by hand or by machine**

The label must say whether the product should be washed by hand or machine. The label also must give a water temperature setting if regular use of hot water will harm the product.

### **Two: Bleaching**

If all commercially available bleaches can be used on a regular basis without harming the product, the label does not have to mention bleach. If using chlorine bleach on a regular basis would harm the product, but using non-chlorine bleach on a regular basis would not, the label must say, "Only non-chlorine bleach, when needed."

If all commercially available bleaches would harm the product when used on a regular basis, the label must say "No bleach" or "Do not bleach."

### **Three: Drying**

The label must say whether the product should be dried by machine or some other method. Unless regular use of high temperature will harm the product when machine dried, it is not necessary to indicate a temperature setting.

### **Four: Ironing**

Ironing information must be given on a care label if ironing will be needed on a regular basis. If regular use of a hot iron will not harm a product, it is not necessary to indicate a temperature setting.

### **Five: Warnings**

If the consumer reasonably could be expected to use a care procedure that would harm the product, the label must contain a warning like "Do not," "No," "Only," to warn against the harmful procedure. For example, if a garment will be harmed by ironing, even if ironing is not regularly needed, the label should state "Do not iron" if the customer can be expected to "touch up" the garment occasionally.

If a care procedure on one product could cause harm to another product being washed with it, a warning must be included. For example, if an item is not colorfast, the label must say, "Wash with like colors" or "Wash separately."

Warnings are not necessary for alternative procedures that could be harmful. For example, if the instructions state, "Dry flat," it's not necessary to state, "Do not tumble dry."

### **c. Drycleaning Instructions**

A simple "dryclean" instruction may be used under two conditions. First, if all commercially available types of solvent can be used, the label doesn't have to mention any particular type of solvent. If one or more solvents would harm the product, however, a safe solvent must be mentioned. (For example, "Dryclean, petroleum solvent.") Second, a simple "dryclean" may be used if the drycleaning process, as defined in the Rule, can be used on the garment with no modifications. If any part of the drycleaning process would harm the product, the "dryclean" instruction must include a warning to avoid or modify that part of the process. "Do not," "No," "Only," or other clear wording must be used. For example, if steam would damage a garment, the label should say, "Dryclean. No steam." In this situation, where a modification must be made to the normal drycleaning process, you may, if you wish, say, "Professionally dryclean. No steam." But "Professionally dryclean" should not be used where there is no need to modify the normal drycleaning process, and it should only be used with the instructions for modifying the process. (E.g., "Professionally dryclean. No steam.") By itself, "Professionally dryclean" is not an adequate instruction.

Remember that "Dryclean Only" is a warning that the garment cannot be washed. For any warning on the label, you must have evidence that the process warned against will damage the garment. You may label garments "Dryclean Only," but only if you have evidence that washing will damage the garment.

## 2. Textile Act & Wool Act

### a. Labeling Requirements

#### Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts (ftc.gov)

The Federal Trade Commission (FTC) has prepared this guide to help you comply with federal labeling requirements for textile, wool and fur products. The law requires that most textile and wool products have a label listing: the fiber content, the country of origin, and the identity of the manufacturer or another business responsible for marketing or handling the item.<sup>1</sup> Labels for fur products are required under a separate statute and rule.<sup>2</sup> The labeling requirements for fur are summarized at pp.34-36. Citations to the statutes and the rules are found in the endnotes.

Care labels for wearing apparel are required under another FTC rule,<sup>3</sup> and information about care labels is found in other FTC publications. For business: Clothes Captioning: Complying with the Care Labeling Rule (listed above).

### b. Fiber Content

If your product is covered by the Textile or Wool Act and Rules, it must be labeled to show the fiber content. The generic fiber names and percentages by weight of each constituent fiber must be listed in descending order of predominance.<sup>14</sup> For example:

65% rayon 35% polyester
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If the product is made from one fiber, you may use the word “All” instead of “100%.” For example: “100% Wool” or “All Wool.”

The disclosure requirement applies only to fibers — contained in yarns, fabrics, clothing, and other household items. If part of the product is made from a non-fibrous material — such as plastic, glass, wood, paint, metal or leather — you don’t have to include that on your label. That is, you don’t have to disclose the contents of zippers, buttons, beads, sequins, leather patches, painted designs, or any other parts that are not made from fiber, yarn, or fabric.

In general, you may name only the fibers that comprise five percent or more of the fiber weight. Fibers of less than five percent should be disclosed as “other fiber” or “other fibers,” as the case may be, and not by their generic name or fiber trademark.<sup>15</sup>

### c. Country Of Origin

Products covered by the Textile and Wool Acts must be labeled to show the country of origin.

- *Imported products must identify the country where they were processed or manufactured.*
- *Products made entirely in the U.S. of materials also made in the U.S. must be labeled “Made in U.S.A.” or with an equivalent phrase.*
- *Products made in the U.S. of imported materials must be labeled to show the processing or manufacturing that takes place in the United States, as well as the imported component.*
  
- *Products manufactured in part in the U.S. and in part abroad must identify both aspects.*

#### **d. Identification Of Manufacturer, Importer, Or Other Dealer**

In addition to identifying fiber content and country of origin, textile labels must identify either the company name or Registered Identification Number (RN) of the manufacturer, importer, or another firm marketing, distributing, or otherwise handling the product. An RN is a number issued and registered by the FTC and may be issued to any firm in the U.S. that manufactures, imports, markets, distributes, or otherwise handles textile, wool, or fur products. RNs are not issued to businesses outside of the U.S. You may use an RN instead of a name to satisfy the labeling requirement.

**Note:** An RN is not required in order to do business in the U.S.

#### **e. If you use a Registered Identification Number (RN)**

A single RN may be used by a company for labeling products under the Textile, Wool, and/or Fur Acts. Only one number will be assigned to a company. In the past, the Commission issued Wool Products Labeling (WPL) numbers for wool products. Although no longer issued, WPL numbers may still be used by companies holding them. An RN or WPL may be used only by the business to which it was assigned. That is, RNs and WPLs are not transferable or assignable.

**The prefix "RN" or "WPL" is part of the Registered Identification Number and must precede the numerals on the label.**

You don't need to get or use an RN to do business; the RN is simply another way to identify your company on labels, instead of using the full company name. However, there are several benefits to using an RN:

- **it lets buyers easily identify and find you by using an RN directory or the RN look-up service on the Internet;**
- **it usually takes up less space on the label than the company name; and**
- **it facilitates record-keeping and helps you keep track of who's who in the textile trade.**

You also may find that some companies will require you to have an RN in order to do business with you.

#### **\* Other Sites of Interest**

Textile Products Identification Act

[Textile Products Identification Act](#) (ftc.gov)

Wool Products Identification Act of 1939

[Wool Products Identification Act of 1939](#) (ftc.gov)

19 CFR Part 102 (Rules of Origin)

[Part 102—Rules of Origin](#) (gpo.gov)