

# SAFEGUARDS

SGS CONSUMER TESTING SERVICES

SOFTLINES

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## RECYCLED TEXTILES: IMPACT ON LABELING REQUIREMENTS, MATERIAL IDENTIFICATION AND ADVERTISING CLAIMS

The use of recycled material in textile garments is very popular today. Information about recycled textiles emphasizes various environment benefits, limiting waste and reducing energy consumption. Are you confused by the number of different standards, labels, and various environmental market claims about recycled textiles? What do they mean? Are they legitimate and accurate labels? How can we be sure?

- Environmental Marketing Claims

In US, the Federal Trade Commission (FTC) seeks to prevent deception and unfairness in the marketplace. The FTC has authority to bring law enforcement actions against false or misleading marketing claims, including environmental or "green" marketing claims.

The FTC looks at all advertising from the consumer's perspective: what message does the advertising actually convey to consumers? The FTC Environmental Guides, often referred to as the "Green Guides", explain how consumers are likely to interpret environmental marketing claims so that marketers can avoid making false or misleading claims.

For environmental claims that the Guides do not address specifically, FTC law requires substantiation for all reasonable interpretations of an advertisement. Sometimes, it may be necessary to do research to determine how different consumers interpret an advertisement.

- Environmental Marketing Claims Must be Clear to Consumers

Specific environmental claims are easier to substantiate than general claims and are less likely to be deceptive. An unqualified general claim of environmental benefit may convey that the product has far-reaching environmental benefits, when it doesn't.



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A cloth shopping bag is labeled "eco-friendly." This claim would be deceptive if it leads consumers to believe that the bag has environmental benefits that the manufacturer can't substantiate. The claim would not be deceptive if "eco-friendly" were followed by clear and prominent language limiting the "friendly" representation to substantiated product attributes and if the context didn't create any other deceptive implications. A qualification for the "eco-friendly" claim (assuming substantiation) might be: "This cloth bag is reusable and is made from 100% recycled fibers."

- "Recycled Content" Claims on recycled textiles

"Recycled content" claims on labels and in advertising may be made for materials that have been recovered or diverted from the manufacturing process (pre-consumer) or recovered after consumer use (post-consumer). If the product or package does not consist of 100 percent recycled content (excluding minor, incidental components), qualifying words like the percentage of recycled content in the product-must be used to limit the claim.

For example, recycled textiles can be made from both pre-consumers waste (e.g. fiber, yarn or fabric waste) and post-consumer waste (e.g. used water bottles, used clothes). Through a conversion process, the waste materials are reformulated to recycled chip or fiber materials. The recycled chips are melted into molten polymer and are extruded into yarn for making fabric. Recycled natural fibers are spun into yarn that can be used in fabrics.

Pre-consumer recycled material is a waste product of a manufacturing process which would not normally be reused by industry during the original manufacturing process. To make an appropriate "pre-consumer" recycled content claim, proof must be made that the pre-consumer material would otherwise have gone into a waste disposal process.

In contrast, by-products of a manufacturing process that normally are reused within the process and usually don't enter the waste stream don't count toward recycled content. When a "recycled content" is claimed on the article, it is required to distinguish between pre-consumer and post-consumer materials if substantiation is needed.

For any enquiries about labeling, please do not hesitate to contact us for further information.

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WHEN YOU NEED TO BE SURE

