

Product Responsibility Best Practices	SUBJECT Care Labeling for Apparel	LAST UPDATE July 2018
	APPLIES TO • Suppliers	FOCUS ON Creating care labels on apparel
	QUICK LINKS <ul style="list-style-type: none"> • PPAI Corporate Responsibility: www.ppai.org/corporate-responsibility/ • UL: industries.ul.com/premiums-promotional-and-licensed-goods • Consumer Product Safety Commission: www.cpsc.gov 	

Intended for beginner compliance programs

Italic grey text indicates a hyperlink listed in the Online Resources section of this document.

There are two Federal regulations that govern care labeling for apparel:

- Fiber Identification Act
- Care Labeling Regulations

Fiber Identification Act

Under the *Fiber Identification Act*, all wearing apparel must include the correct fiber content, +/- 3% accuracy. For example, if an item is labeled 65% polyester and 35% cotton, the minimum amount of polyester is 62%, and the maximum is 68%. The minimum for cotton is 32% and maximum is 38%. There is a 5% rule in which fibers of less than 5% should be disclosed as “other fiber” rather than their generic name.

The only exceptions to this 5% is wool which must be disclosed, or if the fiber has a definite functional significance such as spandex for elasticity. Then the label could say “96% acetate, 4% spandex.” Trim not exceeding 15% of the surface area does not need to be listed separately and label could state “exclusive of decoration.” If it exceeds 15% of the surface area, it must be labeled separately, such as “Body: 100% cotton” and “Decoration: 100% silk.”

Federal Trade Commission’s Care Labeling Rule

The Federal Trade Commission’s (FTC) *Care Labeling Rule* requires manufacturers and importers to attach care instructions to clothing and some piece goods in accordance with *16CFR part 423*.

The care label must include:

- How to launder the garment and at what temperature
- If the product can be bleached and if there is a recommended type
- How to dry the garment and at what temperature
- If the garment can be ironed and under what conditions

When Must An Item Have A Care Label?

- Domestic manufacturers must attach care labels to finished products before they sell them.

- Importers must ensure that care labels are attached to products before they sell them in the United States.

Testing for Care Label Information

Care labels are based on tests of a product for the characteristics below:

- Shrinkage (dimensional stability)
- Appearance after laundering
- Colorfastness to laundering
- Colorfastness to chlorine and non-chlorine bleach

A reasonable basis to determining appropriate care label instructions is necessary. This includes reliable evidence that the product was not harmed when cleaned reasonably often according to the instructions on the label or that the product or a fair sample of the product was harmed when cleaned by methods warned against on the label, such as “do not dry clean.”

For example if your label states “non-chlorine bleach only,” you should have information that chlorine bleach will harm the fabric.

- You cannot use the lowest denominator and label everything as “hand wash only, line dry.”



Exemptions

The following items don’t need permanent care labels but must have conspicuous temporary labels at the point of sale:

- Totally reversible clothing without pockets.
- Products that may be washed, bleached, dried, ironed, and dry-cleaned by the harshest procedures available, as long as the instruction, “Wash or dry-clean, any normal method,” appears on a temporary label.
- Products that have been granted exemptions on grounds that care labels will harm their appearance or usefulness. You must apply for this exemption in writing

to the Secretary of the FTC. Your request must include a labeled sample of the product and a full statement explaining why the request should be granted.

The following items don't need care instructions:

- Products sold to institutional buyers for commercial use. For example, uniforms sold to employers for employee use in job-related activities but not purchased by the employees.
- Garments custom-made of material provided by the consumer.
- Products granted exemptions under Section (c) (2) of the original rule because they were completely washable and sold at retail for \$3 or less. If the product no longer meets this standard, the exemption is automatically revoked.

Where Can I Put A Care Label On A Garment?

- Labels must be attached so they can be seen or easily found by consumers at the point of sale.
- If labels can't be seen easily because of packaging, additional care information must appear on the outside of the package or on a hang tag attached to the product.
- Labels must be attached permanently and securely and be legible during the useful life of the product.
- A garment that consists of two or more parts and is always sold as a unit needs only one care label if the care instructions are the same for all the pieces. The label should be attached to the major piece of the suit. If the suit pieces require different care instructions or are designed to be sold separately, like coordinates, then each item must have its own care label.

Penalty For Non-Compliance

Failure to provide reliable care instructions and warnings for the useful life of an item is a violation of the Federal Trade Commission Act. Violators are subject to enforcement actions and penalties of up to \$16,000 for each offense (in enforcement actions, the FTC contends that each mislabeled garment is a violation). Penalties have ranged as high as \$300,000.

What Symbols Can I Use?

The five care labeling sets of symbols used in the world are American, European, Japanese, Canadian and Australian. When shipping to customers outside of the United States, check to make sure that your garment is compliant with the appropriate regulation.

They all require symbols for washing, bleaching, drying, ironing and dry cleaning information on labels. Only the U.S. symbols by the ASTM can be used in the U.S.

CPSIA Tracking Labels

In addition to care labeling, all youth-sized apparel must include a permanent tracking label affixed to the garment. For more information on tracking labels see the *PPAI Best Practices: Decorated Children's Apparel Testing* and/or *PPAI Best Practices: Secondary Tracking Labels*.

ASTM Guide To Care Symbols			
 Wash	Machine Wash Cycles  Normal  Permanent Press  Delicate/Gentle  Hand Wash		Warning symbols for laundering  Do Not Wash  Do Not Bleach  Do Not Dry (used with do not wash)  Do Not Wring
	Water Temperatures (Maximum) (200F) (160F) (140F) (120F) (105F) (65F-85F) Symbol(s) 95C 70C 60C 50C 40C 30C 		
 Bleach	 Any Bleach When Needed  Only Non-Chlorine Bleach When Needed		Additional Instructions (in symbols or words)  Do Not Iron  Do Not Tumble Dry  In the Shade (added to line dry, drip dry or flat dry)  No Steam (added to iron)
 Dry	Tumble Dry Cycles  Normal  Permanent Press  Delicate/Gentle  Line Dry/Hang to Dry Tumble Dry Heat Setting  Any Heat  High  Medium  Low  No Heat/Air  Drip Dry  Dry Flat		
 Iron	Iron-dry or Steam Maximum Temperature  200C (390F) High  150C (300F) Medium  110C (230F) Low		
 Dryclean	Dryclean - Normal Cycle  Any Solvent  Any Solvent Except Trichloroethylene  Petroleum Solvent Only  Do Not Dryclean		Dryclean - Additional Instructions  Short Cycle  Reduce Moisture  Low Heat  No Steam Finishing
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Online Resources:

PPAI Responsible Sourcing FAQs:

ppai.org/corporate-responsibility/product-responsibility/product-responsibility-faqs/

PPAI Promotional Products TurboTest®:

ppai.org/corporate-responsibility/product-responsibility/solutions

PPAI Best Practices Decorated Children's Apparel Testing:

<http://www.ppai.org/media/1801/pr-bp-decorated-childrens-apparel-testing.pdf>

PPAI Best Practices Secondary Tracking Labels:

<http://www.ppai.org/media/1818/pr-bp-secondary-tracking-label.pdf>

Federal Trade Commission's Clothes Captioning: Complying with the Care Labeling Rule

www.ftc.gov/tips-advice/business-center/guidance/clothes-captioning-complying-care-labeling-rule

American Association of Textile Chemists and Colorists (AATCC) Test Methods & Evaluation Procedures:

www.standardsportal.org/usa_en/sdo/aatcc.aspx

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