



USA LABELING QUESTIONS & ANSWERS

有关美国标签标准的问答

IDFL has received many calls and faxes about the new USA Standards for down and feather labeling. The following are the most common questions about the new labeling standards.

DEADLINES FOR CONFORMING TO THE NEW USA LABELING STANDARDS

Sept. 1, 2000	Members of the American Down Association (ADA) began using the new USA labels for all new products.
Jan. 1, 2001	Products sold in California should have the new label.
June 1, 2001	All products on the retail shelves must have the new label as per agreement of the association of state regulators (ABFLO).

1. HAS THE FTC APPROVED THE NEW USA LABELING STANDARDS?

The FTC has published what it deems reasonable for down and feather labeling standards. The USA standards meet the FTC expectation. The FTC expected ABFLO, ADA, and other industry groups to develop details for new USA labeling standards. The new USA standards meet the FTC requirements as contained in the January 1999 brochure, "Advertising and Labeling of Feather and Down Products."

2. DO THE STANDARDS APPLY TO BOTH BEDDING & APPAREL?

Yes, the basic labeling standards for filling material apply to both bedding and garments. The old FTC rules for both bedding and garments NO LONGER EXIST. Labeling of garments must follow the new down and feather guidelines agreed on by the American Down Association and ABFLO. Obviously, the complex bedding label is not necessary for garments. But the basic rules of the down/feather content apply. Each state has individual regulations on what kind of label is required for bedding and garments. In most states the larger, legal hanging tags are 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.

迄今为止, 国际羽绒羽毛检测实验室 (IDFL) 已接收到许多咨询美国新羽绒羽毛产品标签规定的来电和传真。以下是咨询者提出的有关美国新羽绒羽毛产品标签规定的一些常见问题。

各组织、机构及销售商、制造商必须开始强制性遵守并执行美国新产品标签规定的最终期限

2000 年 9 月 1 日	美国羽绒协会 (ADA) 下属各成员开始遵守并执行美国新产品标签规定, 所有新产品都必须符合新产品标签规定的要求。
2001 年 1 月 1 日	美国加利福尼亚州境内销售的产品都必须使用符合新产品标签规定的新标签。
2001 年 6 月 1 日	根据各州政府调节员组织协会, 即国际家纺用品和家居用品法律官员协会 (IABFLO) 所达成的协议, 所有上架产品都必须使用符合新产品标签规定的新标签。

1. 美国新羽绒羽毛产品标签规定是否已通过美国联邦贸易委员会 (FTC) 的审核和批准?

美国联邦贸易委员会 (FTC) 已对外公布其认为合规合理的羽绒羽毛产品标签规定。美国新羽绒羽毛产品标签规定完全符合美国联邦贸易委员会 (FTC) 的各项要求。美国联邦贸易委员会 (FTC) 希望国际家纺用品和家居用品法律官员协会 (IABFLO), 美国羽绒协会 (ADA) 及羽绒羽毛行业其他组织或机构不断健全、完善美国新羽绒羽毛产品标签规定。美国联邦贸易委员会 (FTC) 于 1999 年 1 月制定并颁发了《羽绒羽毛制成品广告和产品标签的规定》, 美国新产品标签标准符合该规定的所有要求。

2. 美国新羽绒羽毛产品标签标准是否适用于以羽绒羽毛为原材料的家纺用品及服装产品?

答案是**肯定**的。该标准中用于规范填充材料的基本产品标签准则适用于家纺用品和服装产品。由美国联邦贸易委员会 (FTC) 制定的有关家纺用品和服装产品的指导准则已经失效。美国羽绒协会 (ADA) 和国际家纺用品和家居用品法律官员协会 (IABFLO) 经协商达成一致, 共同制定了新的羽绒羽毛指导准则; 目前, 所有服装产品的标签都必须符合新的羽绒羽毛指导准则的要求。有关家纺用品的产品标签标准显然过于复杂, 并不完全适用于服装产品; 但其中用于规范羽绒/羽毛成分的基本准则仍然适用于服装产品。对家纺用品和服装产品应使用何种产品标签这一问题, 美国各州的规定各不相同, 各州有各州特定的规范和标准。目前, 绝大多数州只要求家纺用品必须附有符合法律规定的、尺寸较大的悬挂标签。而销售商/制造商可以选择在服装产品的衣领标签或侧面标签上清晰注明羽绒填充材料所含的各种成份。若想具体了解各州

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3. HAVE INDIVIDUAL STATES CHANGED THEIR LABELING LAWS?

California adopted new regulations in April 2000. Other states are working on regulations and policy changes for products sold after June 1, 2001. The International Sleep Products Association (ISPA) publishes an annual list of state and federal regulation for bedding products in the "2002 Manual Labeling Laws & Registration Requirements." Please send order from to: ISPA 501 Wythe Street Alexandria, VA 22314-1917

4. WHAT IS THE MINIMUM DOWN REQUIRED FOR THE "DOWN" LABEL?

The new standard requires 75% minimum down clusters (down, nestling down, and plumules) for products labeled "DOWN." No tolerance is allowed.

5. WHAT IS THE TOLERANCE FOR DOWN & FEATHER "BLENDS?"

No tolerance is allowed for blended products. Products labeled "50% DOWN / 50% FEATHERS" must contain a minimum of 50% actual down cluster.

6. CAN DOWN FIBER BE INCLUDED IN THE "MINIMUM REQUIRED DOWN CLUSTER?"

No. The previous FTC guidelines had a down fiber allowance, but the new standards do NOT include a down fiber allowance. Only down clusters (down, nestling down, and plumules) are included in the down calculation.

7. WHY DO FEATHER AND DOWN PRODUCTS NOT USE THE NORMAL FTC TEXTILE STANDARDS?

The FTC Textile Standard allows only a 3% tolerance. This means that a product labeled "DOWN" would require 97% down. The FTC agrees down and feathers need special guidelines. However, if reasonable labeling standards are not adopted, the FTC might enforce the textile standards.

8. WHAT ARE THE OFFICIAL USA TEST METHODS?

The new USA standards require International Down and Feather Bureau (IDFB) test methods. The IDFB test methods have been recently updated. IDFL, along with Hohenstein Institute, organized the recent update after years of researching and refining test methods.

现行的规范和标准, 请向各州有关部门进行咨询。

3. 各州用于规范产品标签的法律、法规及标准是否已发生变化?

美国加利福尼亚州于 2000 年 4 月正式采纳并实施有关羽绒羽毛产品的新规范。其他各州正致力于修改并完善相关标准、规范和政策, 以便适用于 2001 年 6 月 1 日后销售的产品。国际床上用品协会 (ISPA) 在其出版的《2002 年度有关产品标签法律法规和注册管理的指导守则》中, 发布了一份囊括联邦政府和各州政府制定的有关家纺产品的标准和规范的年度清单。若有意购买此清单, 请将订单寄至: The International Sleep Products Association (ISPA) 501 Wythe Street, Alexandria, VA, 22314-1917

4. 新产品标签标准对标签中使用“羽绒”一词的产品的最低羽绒含量的具体规定?

新产品标签标准明确规定, 标签中使用“羽绒”一词的产品, 其朵绒含量 (含绒朵、未成熟绒和毛型绒) 不得低于 75%, 即最低朵绒含量为 75%。同时不允许存在任何公差。

5. 新产品标签标准对以羽绒和羽毛为原材料的混纺产品的公差规定?

新产品标签标准明确规定, 混纺产品不允许存在任何公差。例如, 若某混纺产品的标签上标明“羽绒含量 50%/羽毛含量 50%”, 则该产品的实际朵绒含量必须至少达到 50%。

6. “绒丝”能否被视为“最低朵绒含量”的组成部分?

答案是否定的。过去通行的、由美国联邦贸易委员会 (FTC) 制定的指导准则中明确规定了可接受的“绒丝公差”, 但新标准中并未制定可接受的“绒丝公差”。只有朵绒 (含绒朵、未成熟绒和毛型绒) 才能被认可属于“羽绒”的有效组成部分。

7. 美国联邦贸易委员会 (FTC) 制定的普通纺织品标准不适用于羽绒羽毛制成品的原因?

美国联邦贸易委员会 (FTC) 制定的普通纺织品标准规定的可允许的公差为 3%, 这就意味着若依据此标准, 标签上标明“羽绒”一词的产品, 其最低羽绒含量不得低于 97%。因此, 美国联邦贸易委员会 (FTC) 考虑到羽绒羽毛的特殊性, 同意为其单独制定特别的指导准则。但是, 若没有合理合规的标签标准供美国联邦贸易委员会 (FTC) 研究采纳, 美国联邦贸易委员会 (FTC) 则可能采纳并执行普通纺织品标准。

8. 目前美国官方认可的羽绒羽毛检测方法是什么?

美国新标准明确规定, 国际羽绒羽毛局 (IDFB) 检测方法是其官方认可的羽绒羽毛检测方法。国际羽绒羽毛局 (IDFB) 检测方法于近期得到进一步改进和升级。国际羽绒羽毛检测实验室 (IDFL) 联合德国海恩斯坦研究院, 负

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9. WHAT IS THE PURPOSE OF THE SUB-LABEL IN THE USA STANDARD?

The new USA standard allows for general categories in the label:

DOWN

FEATHERS AND DOWN

DOWN AND 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:

Both products are “DOWN,” but the 90% product is generally better.

10. WHAT ABOUT TESTING TOLERANCES OR MANUFACTURING VARIANCES?

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.

11. IS THE SUB-LABEL FOR DOWN PRODUCTS OPTIONAL OR REQUIRED?

The current USA standard requires sub-labels for “DOWN” products.

12. WHAT ABOUT “HYPER-CLEAN,” “SUPER-CLEAN,” & “HYPO-ALLERGENIC” CLAIMS?

The FTC requires that such claims be carefully documented.

13. WHY HAS THE MINIMUM ALLOWANCE FOR DAMAGED FEATHERS INCREASED?

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

The IDFB completed a study which determined that a 7% allowance (of the feather portion) for damaged feathers is realistic.

责改进和升级国际羽绒羽局（IDFB）检测方法；经过数年的研究和实验，该检测方法日趋完善。

9. 美国新标准中规范产品的副标签的目的是什么？

美国新标准将产品标签的主标签分为四大类：

羽绒

羽毛和羽绒

羽绒和羽毛

羽毛

产品的主标签通常被使用于概括性描述产品。销售商/制造商可以在产品的广告宣传及市场营销中使用以上四个主标签专业术语。

产品的副标签则有助于消费者和零售商大致辨别出不同产品在质量上的差异。例如，两份不同的产品，其主标签上都标明“羽绒”，但正是得益于新标准所倡导的副标签，我们可以辨别出那一份产品的羽绒含量较高，那一份产品的羽绒含量较低；一般说来，羽绒含量较高的产品，其质量更胜一筹

10. 美国新标准对检测公差和生产差异的规定？

对产品进行多重检测，综合各检测结果后取平均检测结果为实际检测结果。产品的实际检测结果必须符合或超过产品标签上所宣称的标准。然而，产品的单一检测结果与产品标签上所宣称的标准之间可能存有差异。

11. 羽绒羽毛产品的副标签是必须有的还是可选性的？

现行美国新羽绒羽毛产品标签标准明确规定，所有“羽绒”产品必须附有副标签。

12. 美国新标准对宣称“极净”、“超净”和“抗过敏”性能的产品标签的规定？

美国联邦贸易委员会（FTC）明确规定，凡是在标签中宣称“极净”、“超净”和“抗过敏”性能的产品，都必须附有相关证明文件。

13. 美国新标准中损伤毛最小公差变大的原因？

过去通行的美国联邦贸易委员（FTC）标准中规定，损伤毛含量不得超过 2%。该规定适用于羽绒制成品，但不适用于某些羽毛成份含量高的产品。

经过研究试验，国际羽绒羽局（IDFB）决定将损伤毛含量（即损伤毛占总羽毛的比例）的最小公差提高到 7%，以更为符合实际情况的需要。

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14. WHAT ABOUT THREADCOUNT AND DOWNPROOF CLAIMS?

Thread count and downproof claims fall under normal FTC guidelines for textiles and honest advertising. Thread count claims should have no more than 3-5% tolerance. The use of double-yarn to double thread count is not accurate. (There is disagreement on how whether to count double yarns as one or two threads.)

15. 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%.

16. WHAT IS THE STANDARD FOR OXYGEN NUMBER AND TURBIDITY?

The California regulation requires an oxygen number of 20 or less. Many buyers and some states have considered a stricter requirement (10 or less). No official standard exists for turbidity. Super-clean products generally have a turbidity of 500+. A turbidity of over 200-300 is considered acceptable.

17. HOW DOES THE NEW USA LABELING STANDARD COMPARE TO OTHER COUNTRIES? JAPAN

Similar to new USA label, 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 stricter than before and contains additional information, such as fill power.

14. 新标准对产品经纬密度和防钻绒性能的规定?

产品的经纬密度和防钻绒性能必须严格遵照美国联邦贸易委员会 (FTC) 制定的用于规范普通纺织品及诚信广告宣传的指导准则。产品的实际经纬密度和产品标签上标明的经纬密度之间的最小公差不得超过 3%-5%。在计算经纬密度时, 若一根经纱或纬纱是由两股纱线绞捻而成的, 那么该经纱或纬纱在数量上仍应当计为一根, 而不是两根。(有人对此不赞成, 认为两股纱线绞捻而成的应计为两根)

15. 若某产品的绒丝含量或羽丝含量超过 10%, 美国新标准对此有何规定?

美国新羽绒羽毛标签标准明确规定, 若产品的绒丝含量或羽丝含量超过 10%, 则必须在产品的标签上单独列明实际的绒丝含量或羽丝含量。单一的纺织纤维在品质上逊于羽绒或羽毛。

例如, 某产品的羽丝含量超标, 其标签应当遵照以下模式:

羽绒和羽毛: 羽绒含量 60% / 羽毛含量 25% / 羽丝含量 15%

16. 美国新标准对产品耗氧指数和浊度值的规定?

美国加利福尼亚州有关羽绒羽毛产品的新规范中规定, 产品的耗氧指数不得超过 20 (≤ 20)。许多买家和部分州对耗氧指数的要求更为严格, 规定产品的耗氧指数不得超过 10 (≤ 10)。新标准尚未对产品的浊度值作出官方要求。通常情况下, 普通产品的浊度值大于 200 或 300; 标签上标明“超净”的产品, 其浊度值大于 500。

17. 美国新羽绒羽毛产品标签标准与其他各国的标准相比较, 是否存在差异?

日本标准

与美国新羽绒羽毛产品标签标准大致相同; 日本标准规定标签中必须注明产品的蓬松度

中国标准

中国标准接近于美国新羽绒羽毛产品标签标准

加拿大标准

加拿大通常规定, 羽绒产品的含绒量必须达到 75%

欧洲标准

新制定的欧洲产品标签标准相比于过去更为严格, 其内更为广泛, 例如就产品蓬松度做出了相关规定。

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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 IS THE PENALTY FOR MISLABELING DOWN PRODUCTS?

Each 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 subjected to court action, or their products have been removed from the shelves.

18. 美国是否有规范产品蓬松度的相应标准?

新美国标准并无规定产品标签上必须注明产品的蓬松度。但如果产品的外包装或广告宣传中提及蓬松度,那么消费者应当注意产品的蓬松度公差应当控制在 5% 左右。国际羽绒羽毛局 (IDFB) 官方蓬松度检测方法使用洛奇检测仪 (Lorch Machine) 进行检测试验。国际羽绒羽毛检测实验室 (IDFL) 分别使用美国气缸和洛奇检测仪对 1,000 份样品进行了检测试验,结果显示,这两种检测仪器所产生的检测结果之间的差异仅为 0.4%。

19. 羽绒产品卖家(销售商/制造商)误贴、滥贴标签或在标签上弄虚作假、欺瞒哄骗的行为将受到何种处罚?

各州对违法卖家(销售商/制造商)的具体处罚规定各不相同。美国联邦贸易委员会(FTC)有可能率先采取处罚措施。按照以往的情况,违法卖家(销售商/制造商)将被处以罚款并追究其法律责任,或将其产品全部下架。