

SAMPLE FEATHER AND DOWN OR ANIMAL HAIR LAW LABEL

FOR ADDITIONAL LABELING FOR FEATHER AND DOWN

SEE IDFL'S USA LABELING OF PRODUCTS IN THIS MANUAL

Note: Label is not to scale

Legal Label Inc. created this sample, in conjunction with IABFLO and ISPA, to illustrate how to prepare a typical bedding law label. It should be used as a general guide only. Various factors, including a specific state's laws and regulations, the product's contents/characteristics, and how a product is manufactured/imported, could require changes to this sample. Manufacturers and importers should consult with legal counsel or other qualified professionals in determining what information to include on their labels.

All printing on labels must be in permanent ink and in the English language. The color of the print must be black on a white label. The law label must be securely attached to the product.

If the label is not visible to the consumer at time of purchase, it must also be printed on the packaging in full size using a white background and black type.

The label material must be of Tyvek or of a material of comparable quality, which will not flake, abrade or tear.

Only the English language is permitted on the label. No text or print may appear on the back of the label.

Label must be a minimum of 2 x 3 inches.

The length starts at the beginning of the word "UNDER" and ends at the country of origin on the bottom of the law label.

The lines separating the text must extend to the edge of the law label.

Minimum type font size of 1/8 inch is required in all sections of the law label with the exception of the "other information" section. There is no font size requirement in this section except for the Country of Origin and Date of Delivery that needs to be in 1/8 inch font. All uppercase (or capital) letters need to be 1/8 inch in font height. The Country of Origin also need to be in all caps and in bold type. Please note not all 9 point fonts fit the 1/8 inch minimum text criteria.

The feather and down or animal hair law label follow the same format as the bedding law label, except the statement "CONTENTS STERILIZED" must be added to the bottom of the "New Material" section of the label. And the words PER.NO. added in the REG.NO. box along with the sterilization permit number issued.

The states of PA, MA, RI, UT and CT require registration for a sterilization permit for all products containing feather and down or animal hair. In addition, PA & UT require an approved third party to inspect and certify the process before it will issue a sterilization permit number. As such, PA does not recognize any other state's permit number. So one should obtain the permit number from PA and then apply to the other states.

Use the following option as appropriate, depending if you are the manufacturer (MADE BY), or if you are the importer or distributor (MADE FOR).

Please note: "MADE BY" and "MADE FOR" are the preferred terms accepted by all states. Other terms, such as manufactured by, imported by, or distributed by may be used as well. Sold by should not be used as it indicates in some states the item is second hand. The phrases "MADE BY" or "MADE FOR" must be in capital letters, bold print and 1/8 font height. The name and full street address is required to be on the label but is not required to be in bold print or in all caps. All uppercase letters of the name and address need to be 1/8 inch in font height.

This section is referred to as the "other information section" and frequently contains required federal information such as Country of Origin, FTC textile information and a federal RN#, if desired.

For items that are used for warmth, the FTC requires that the fill be listed here as well as in the "New Materials" section if the product does not also bear a separate textile label. In such a situation, the cover material must be disclosed in this section as well. Also permitted here is "other" information required by a state regulation, such as *finished size or net weight of filling material. Please note this does not include care labeling. Care instructions are not allowed on the law label.

This "other information section" is not required to be in 1/8 inch font with two exceptions. The Country of Origin needs to be all caps, bold and 1/8 inch in font height. The words "Date of Delivery" can be in upper and lower case font, the upper font must meet the 1/8 inch font height. Please note not all 9 point fonts fit the 1/8 inch minimum text criteria.

UNDER PENALTY OF LAW THIS TAG NOT TO BE REMOVED EXCEPT BY THE CONSUMER	
ALL NEW MATERIAL consisting of WATERFOWL FEATHERS AND DOWN (90% FEATHERS, 10% DOWN)	
CONTENTS STERILIZED	
REG. NO.	PER. NO.
Certification is made by the manufacturer that the materials in this article are described in accordance with law	
MADE BY [or MADE FOR]	
Name and address of manufacturer, Importer or distributor as appropriate	
Date of Delivery _____	
Finished Size: in. x in.	
Net Wgt of Filling Mat 'l lbs. oz.	
Cover:	
MADE IN	

Minimum length is 3 inches.

Minimum width is 2 inches.

* In California, the finished size is required for articles of bedding such as sleeping bags, mattresses, comforters, mattress pads, box springs, pillows and similar articles, showing the width and length expressed in inches. Decorator pillows need not show size. In addition, California requires the net weight of filling materials of articles of bedding, such as sleeping bags, mattresses, box springs, pads* and similar items stated, in pounds and ounces. Though net weight is required in California for "sleeping pads," it is not required for a "mattress pad." Please confer with California authorities to determine how your "pad" qualifies.

UNIFORM LAW LABELS

LAW LABELS FOR FEATHER & DOWN

DOWN PRODUCTS

New labeling requirements for feather and down went into effect January 1st, 2001. Any product now labeled as "DOWN" must contain a minimum of 75% down and plumules. Manufacturers must disclose the minimum percentage of down in a product.

EXAMPLE:

<p>ALL NEW MATERIAL consisting of</p> <p>DOWN (MINIMUM 75% GOOSE DOWN) CONTENTS STERILIZED</p>
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Down products normally contain small amounts of other components. If these other components exceed the following MAXIMUMS, the percentages of each must be labeled.

- Down Fiber maximum 10%
- Feather Fiber maximum 10%
- Chopped, damaged & Crushed Feathers maximum 2%
- Landfowl Feathers. maximum 2%
- Residue maximum 2%

Quill Feathers are not permitted.

DOWN AND FEATHER BLENDED PRODUCTS

Down and Feather blended products containing between 50% and 74% down and plumules require that the actual percentages of each component be labeled.

EXAMPLE:

<p>ALL NEW MATERIAL consisting of</p> <p>DOWN AND FEATHERS (60% DOWN 40%WATERFOWL FEATHERS)</p> <p>CONTENTS STERILIZED</p>

UNIFORM LAW LABELS

LAW LABELS FOR FEATHER & DOWN

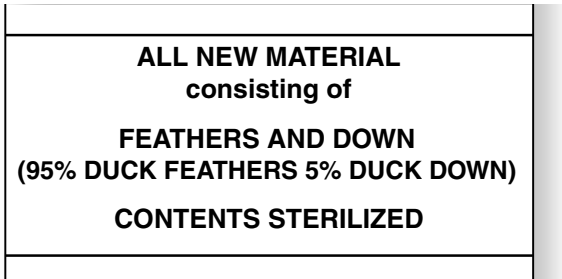
Down and Feather products normally contain small amounts of other components. If these other components exceed the following MAXIMUMS, the percentages of each must be labeled.

- Down Fiber maximum 10%
- Feather Fiber maximum 10%
- Chopped, damaged & Crushed Feathers maximum 7% of feather portion
- Landfowl Feathers. maximum 5% of feather portion
- Residue maximum 2%

FEATHER AND DOWN PRODUCTS

Feather and Down blended products containing between 5% and 49% down and plumules require that the actual percentages of each component be labeled.

EXAMPLE:



Feather and Down products normally contain small amounts of other components. If these other components exceed the following MAXIMUMS, the percentages of each must be labeled.

- Down Fiber maximum 10%
- Feather Fiber maximum 10%
- Chopped, damaged & Crushed Feathers maximum 7% of feather portion
- Landfowl Feathers. maximum 5% of feather portion
- Residue maximum 2%

Quill Feathers are not permitted.

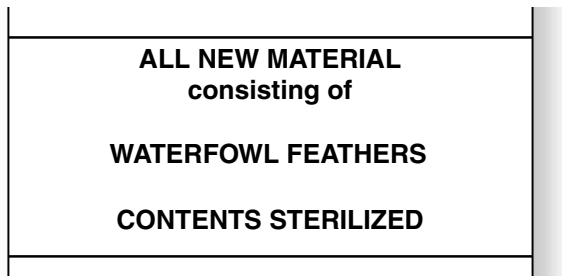
UNIFORM LAW LABELS

LAW LABELS FOR FEATHER & DOWN

WATERFOWL PRODUCTS

The term "WATERFOWL FEATHERS" may be used to designate any industry plumage product containing a minimum of 80% waterfowl feathers and less than 5% down. (The terms "DUCK FEATHERS" and "GOOSE FEATHERS" can also be used if they meet the 90% species requirement.) The remaining 20% may contain down, down fiber, feather fiber, chopped and damaged feathers, and non-waterfowl feathers.

EXAMPLE:



If other components exceed the following maximums, the percentages of each must be labeled.

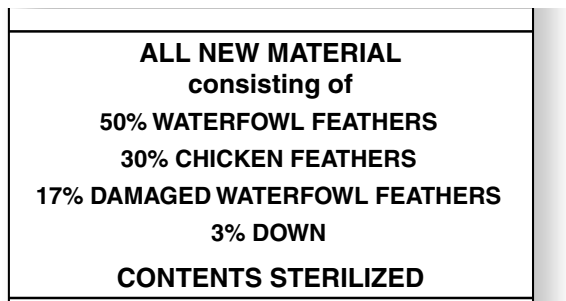
- Down Fiber maximum 10%
- Feather Fiber maximum 10%
- Chopped, damaged & Crushed Feathers. maximum 7%
- Landfowl Feathers maximum 5%
- Residue maximum 2%

Quill Feathers are not permitted.

OTHER PLUMAGE PRODUCTS

Plumage products which do not meet requirements for any of the above categories must be labeled accurately with each component listed separately.

EXAMPLE:



UNIFORM LAW LABELS

LAW LABELS FOR FEATHER & DOWN

OTHER NOTES TO CONSIDER

- **PERCENTAGE CLAIMS-** A plumage product should not be designated as “100% Down,” “All Down,” “Pure Down,” or by other similar terms unless it in fact, contains 100% down.
- **TOLERANCES-** No tolerance is allowed for the minimum percentage of down as stated in the above listed categories.
- **DESIGNATION OF SPECIES-** A plumage product may be labeled by the name of a designated waterfowl species if a minimum of 90% of the waterfowl plumage contained therein is of that species.
- **CLEANLINESS-** All plumage products must have an oxygen number of no greater than 10 as determined by the ABFLO/IDFB test for oxygen number.
- **ADULTERATION-** The maximum content for certain components listed above are not to be construed to permit intentional adulteration of plumage products.
- **TEST METHODS-** Testing shall be done according to test methods published by IDFB.

TERMS NOT ALLOWED ON LAW TAG LABELS

- **SYNTHETIC DOWN-** A new addition to the IABFLO list. This term is illegal in Europe. In addition, SYNTHETIC DOWN is not allowed on packaging or advertising.
- **CURLED FEATHERS-** The term has begun showing up on labels again.
- **FEATHERS-** The term is explicitly prohibited in Texas and in Canada. State officials in other states also will not accept just FEATHERS.

ACCEPTABLE TERMS: WATERFOWL FEATHERS, LANDFOWL FEATHERS, GOOSE FEATHERS, DUCK FEATHERS, CHICKEN FEATHERS

NOTE: It is acceptable to use the term FEATHER if a further description is part of the down and feather labeling.

Examples:

GOOSE DOWN AND GOOSE FEATHERS
(50% DOWN 50% FEATHERS)

GOOSE DOWN AND FEATHERS
(50% GOOSE DOWN 50% GOOSE FEATHERS)

DOWN AND FEATHERS
(50% DOWN 50% DUCK FEATHERS)

DUCK DOWN AND WATERFOWL FEATHERS
(50% DOWN 50% FEATHERS)



UNIFORM LAW LABELS

LAW LABELS FOR FEATHER & DOWN

USA DOWN AND FEATHER LABELING CHART

GENERAL LABEL (REQUIRED SUB-LABEL)	Minimum Required Down Cluster	Maximum Landfowl** Feathers*	Max** Damaged Feathers*	Maximum Residue*	Maximum Down Fiber*	Maximum Feather Fiber*
DOWN						
(MINIMUM 95% DOWN)	95%	2.0%	2.0%	2%	5%	5%
(MINIMUM 90% DOWN)	90	2.0	2.0	2	10	10
(MINIMUM 85% DOWN)	85	2.0	2.0	2	10	10
(MINIMUM 80% DOWN)	80	2.0	2.0	2	10	10
(MINIMUM 75% DOWN)	75	2.0	2.0	2	10	10
DOWN& WATERFOWL FEATHERS						
(DOWN 70%, FEATHERS 30%)	70	2.0	2.1	2	10	10
(DOWN 65%, FEATHERS 35%)	65	2.0	2.5	2	10	10
(DOWN 60%, FEATHERS 40%)	60	2.0	2.8	2	10	10
(DOWN 55%, FEATHERS 45%)	55	2.3	3.2	2	10	10
(DOWN 50%, FEATHERS 50%)	50	2.5	3.5	2	10	10
WATERFOWL FEATHERS & DOWN						
(FEATHERS 60%, DOWN 40%)	40	3.0	4.2	2	10	10
(FEATHERS 70%, DOWN 30%)	30	3.5	4.9	2	10	10
(FEATHERS 80%, DOWN 20%)	20	4.0	5.6	2	10	10
(FEATHERS 90%, DOWN 10%)	10	4.5	6.3	2	10	10
(FEATHERS 95%, DOWN 5%)	5	4.8	6.7	2	10	10
WATERFOWL FEATHERS	--	5.0	7.0	2	10	10

* If Components exceed listed Maximum, such component percentages must be clearly labeled.

** Damaged Feather allowance assumes the new stricter International IDFB damaged feather definition, which is 7% allowance of the feather portion. The current California Regulations inadvertently lists the maximum of 2% damaged feathers and a maximum of 2% landfowl for all blends, which creates a more rigid standard. Therefore, in many cases damaged and landfowl feathers will “technically” exceed the California limit. California is working on correcting the problem.