USA LABELING OF PRODUCTS with BLENDED FILLINGS

IABFLO - March 22 2007 (Document Amended May 13 2014)

Blended Filling Products are pillows, comforters, and featherbeds which have 2 different kinds of fillings blended together. An example is a down and polyester blended pillow.

The following is required labeling for such products on the Uniform Law Tag labels. Suggested packaging and advertising formats are also included to meet "Truth-in-Advertising" requirements of the FTC and/or individual state regulations.

OVERALL FORMAT

The Uniform Law Tag Label shall list the different types of fillings which are blended together in order of highest percentage by weight of the filling:

BLENDED PRODUCTS where neither filling is plumage (down and feathers)

The blended materials are listed in order of highest percentage by weight. For example if a filling contains 7 oz. of polyester and 3 oz. of cotton, the correct label is:

70% POLYESTER FIBER 30% COTTON FIBER

For PLUMAGE (down and feathers) blended with other fillings

The plumage part and the non-plumage part are listed in order of highest percentage by weight.

The % of of the plumage part is described as follows:

75+% down cluster: DOWN

50-74 % down cluster: DOWN & FEATHERS 5-49 % down cluster: FEATHERS & DOWN < 5 % down cluster: WATERFOWL FEATHERS

After the above declaration, the % of down and/or feathers shall be further described. Also, the specie of the feathers or the term "WATERFOWL FEATHERS" must be used in the further description.

For example if a product contains 70% Polyester and 30% Waterfowl Feathers the label is:

If the product contains 70% Polyester and 30% down and feathers (50% Down & 50% Feathers):

(50% DOWN / 50% WATERFOWL FEATHERS) (50% DOWN / 50% WATERFOWL FEATHERS)

If the product contains 70% Polyester and 30% down plumage where the down cluster is at least 75%:

	EXAMPLES OF CORRECT LABELING	
Laboratory Test Results % by Weight	Correct Label listing percentage first.	Correct Label listed component first. (This is the preferred format)
70% Polyester 30% Goose Feathers	70% POLYESTER FIBER 30% GOOSE FEATHERS	POLYESTER FIBER 70% GOOSE FEATHERS 30%

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	EXAMPLES OF CORRECT LABELING	
20% Polyester 80% Duck Feathers	80% DUCK FEATHERS 20% POLYESTER FIBER	DUCK FEATHERS 80% POLYESTER FIBER 20%
10oz Polyester 10oz.Foarm 60% Plumage consisting of 82% Down Cluster 18% Feathers, etc 40% Foam	50% POLYESTER FIBER 50% POLYURETHANE FOAM 60% DOWN (MINIMUM 80% DOWN) 40% POLYURETHANE FOAM	POLYESTER FIBER
40% Plumage consisting of 75% Goose Down Cluster 25% Goose Feathers, etc. 60% Primaloft	60% POLYESTER FIBER 40% GOOSE DOWN (MINIMUM 75% DOWN)	POLYESTER FIBER 60% GOOSE DOWN 40% (MINIMUM 75% DOWN)
40% Plumage consisting of 50% Goose Down Cluster 50% Goose Feathers, etc. 60% Primaloft	60% POLYESTER FIBER 40% GOOSE DOWN & FEATHERS (50% GOOSE DOWN / 50% GOOSE FEATHERS)	POLYESTER FIBER60% GOOSE DOWN & FEATHERS40% (50% GOOSE DOWN / 50% GOOSE FEATHERS)
45% Plumage consisting of 90% Down Cluster 10% Waterfowl Feathers, etc. 55% Lyocell	55% RAYON FIBER 45% DOWN (MINIMUM 90% DOWN)	RAYON FIBER 55% DOWN 45% (MINIMUM 90% DOWN)
40% Plumage consisting of 90% Waterfowl Feathers 10% Landfowl Feathers. 60% Polyester	60% POLYESTER FIBER 40% FEATHERS ** (90% WATERFOWL FEATHERS / 10% LANDFOWL FEATHERS)	POLYESTER FIBER
	** The term "FEATHERS" alone is not allowed unless it is further described on the law tag label.	** The term "FEATHERS" alone is not allowed unless it is further described on the law tag label.

POLYESTER TERMINOLOGY

Polyester Fiber, Polyester Fiber Batting, and Polyester Fiber Pad

California requires additional descriptive nomenclature to be used in conjunction with definitions such as the terms "pad, batting and resinated". For example, if the polyester used is a batting then you would use the term "POLYESTER FIBER BATTING", if it is in the form of a pad then you would use "POLYESTER FIBER PAD". If the polyester is a loose fill then you would only use the term POLYESTER FIBER.

Pennsylvania however does not have the terms "batting" and "pad" in their allowed nomenclature. If you need to use these terms in order to comply with both states a variance form must be sent to the Department of Labor and Industry, Industrial Board, in Pennsylvania.

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PACKAGING AND ADVERTISING

GENERAL GUIDELINES FOR BLENDED FILLING PRODUCTS

- 1. Packaging and Advertising should convey to the consumer the actual contents of the product.
- 2. Packaging and Advertising should not conflict with the law tag label.
- 3. Packaging and Advertising should not confuse which part of the blend has more weight.

INCORRECT PACKAGING & ADVERTISING	CORRECT PACKAGING & ADVERTISING
Feather Pillow	Poly/Feather Pillow
Feather Plus Pillow	Polyester Plus Pillow (Filling of Polyester & Down)
Down Pillow	Down / Poly Pillow
Down Plus Pillow	Down Plus Pillow (Blended with Polyester)
	ADVERTISING Feather Pillow Feather Plus Pillow Down Pillow