

Hat Trick: FTC Announces Changes to Wool Labeling Rules

June 1, 2014

On Wednesday, the FTC announced amendments to the regulations under the Wool Products Labeling Act, which conform the regulations to the requirements of the Wool Suit Fabric Labeling Fairness and International Standards Conforming Act and harmonize them with the Textile Labeling Rules. Similar to the recently-issued amendments to the [Textile](#) and [Fur](#) Labeling Rules, these changes should ease some of the labeling requirements wool product manufacturers and sellers face.

The Commission adopted the following changes:

- Allow certain hang-tags disclosing fiber trademarks and performance, even if the hang-tags do not disclose the product's full fiber content;
- Clarify that a product's country of origin is the country where the product was processed or manufactured, as determined by U.S. Customs and Border Protection;
- Amend the provisions relating to documents, such as invoices and guaranties, to better address e-commerce;
- Replace the requirement that guarantors sign continuing guaranties under penalty of perjury with a requirement that they certify that they will actively monitor and ensure compliance with the applicable Act and Rules;
- Incorporate the new definitions for cashmere and very fine wools, which now require that fibers from the cashmere goat that do not meet the new definition of cashmere be labeled as wool (rather than cashmere); and
- Clarify that products described as containing virgin or new wool must contain wholly new or virgin fiber.

As it did when adopting the final amendments to the Textile and Fur Labeling Rules, the FTC decided against requiring annual renewal of continuing guaranties, noting that the Commission lacked sufficient evidence to conclude that doing so would increase reliability, or that the benefits would exceed the costs. Additionally, the FTC stated that it would be issuing guidance on the hang-tag amendment.

The amendments take effect 30 days after publication in the Federal Register.