CONVERTING OLD FTC STANDARD TO USA-2000 STANDARD

This is a summary of New USA law tag labeling for down and feather products. The American Down Association (ADFS Section of the HFPA) accepts the new California regulation as a model for USA labeling. IDFL compiled this information from many sources, including ADFS, California, USA/FTC, IDFB, and ABFLO.

How should the new standard be referenced?

1. **USA-2000 STANDARD** is the best way of referencing the new standard.
2. Do **NOT** use "NEW FTC STANDARD" – FTC did NOT develop the new standards.

Converting the old FTC law tag label to the new USA-2000 label.

Note: The term "DOWN CLUSTER" is not currently allowed on the law tag label in California and Pennsylvania. Although "DOWN CLUSTER" may be used on the law tag label in some other states, the ADFS uses the term "DOWN" in its press release. The term "DOWN" is acceptable in all states.

Old FTC "DOWN" Label   **New USA-2000 LABEL & SUB-LABEL** (Several Options)

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                                      I----------- GOOSE DOWN   ( MINIMUM 95% DOWN )
                                      I
                                      I----------- GOOSE DOWN   ( MINIMUM 90% DOWN )
                                      I
                                      I----------- GOOSE DOWN   ( MINIMUM 85% DOWN )
    GOOSE DOWN  -----------------------------------I
                                      I----------- GOOSE DOWN   ( MINIMUM 80% DOWN )
  (New label could be one             I
   of six labels - depends            I----------- GOOSE DOWN   ( MINIMUM 75% DOWN )
   on the down cluster % )            I
                                      I----------- GOOSE DOWN & FEATHERS
                                                   ( 70% DOWN, 30% FEATHERS)
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Blends - Old FTC Label	Min. Down Cluster in Old FTC Label	New USA-2000 Label & Sub-label Required for the same Down / Feather Product
80% DOWN 20% FEATHERS	56 %	DOWN & FEATHERS (55% DOWN, 45% FEATHERS)
70% WHITE GOOSE DOWN 30% WHITE GOOSE FEATHERS	49 %	WHITE GOOSE DOWN & FEATHERS (50% DOWN, 50% FEATHERS) (Assumes Down Cluster is actually 50% not 49 %)
50% DUCK DOWN 50% DUCK FEATHERS	35 %	DUCK FEATHERS & DOWN (65% FEATHERS, 35% DOWN)
90% FEATHERS 10% DOWN	7 %	FEATHERS & DOWN (93% WATERFOWL FEATHERS, 7% DOWN) (New label could be 90 / 10 if product has 10% down cluster)

The General Label and the SUB-LABEL

In the old FTC guidelines, "DOWN" was defined to contain at least 70% down clusters, plus allowances for down fiber and other components. The new USA-2000 Standard requires labeling of minimum down cluster ("DOWN"). Other components, such as down fibers, landfowl, residue etc., are included in the "FEATHER" portion of the new label.

The new ADFS/USA guidelines require one of the following four General Labels on the law tag:

1. DOWN	**3. FEATHERS & DOWN**
2. DOWN & FEATHERS	**4. WATERFOWL FEATHERS**

In addition, the following Sub-Labels are required on the law tag label:

> **DOWN** products require the sub-label as follows: **(MINIMUM XX% DOWN)**
> **DOWN & FEATHER** products and **FEATHER & DOWN** products require the sub-labels:

DOWN & FEATHERS	FEATHERS & DOWN	GOOSE DOWN & FEATHERS
DOWN XX%	WATERFOWL FEATHERS XX %	GOOSE DOWN XX %
WATERFOWL FEATHERS XX%	DOWN XX %	GOOSE FEATHERS XX %

Can the term "DOWN CLUSTER" be used in the sub-label?

"DOWN CLUSTER" is the sum of downs, nestling downs, and plumules found in any waterfowl product.
The official ADA and IDFB definition is:

> **The group of components: down, nestling down, and plumules.**
> **(Down fiber and other components are specifically excluded from this group of components.)**

1. California and Pennsylvania will not accept the term "DOWN CLUSTER" on the law tag label.
2. Although some states accept the term "DOWN CLUSTER," the term "DOWN" is the correct label, as it will be accepted by ALL STATES.
3. "DOWN CLUSTER" may be used in packaging and advertising.

Implementation Schedule

March 2000	IABFLO adopted new label guides.
Apr. 16, 2000	California enacted new law tag label regulations.
June 3, 2000	ADFS votes to accept law label standards as contained in the California regulation.
Sept 1, 2000	ADFS members will begin using only the new law tag labels.
Jan. 1, 2001	Products sold in California should have the new law tag labels.
June 1, 2001	Products in other states should have the new law tag labels.