



Federal Trade Commission
BCP Business Center
business.ftc.gov

Cachet of Cashmere: Complying with the Wool Products Labeling Act

Cashmere. The very word evokes images of luxury, warmth and softness. The ultra-fine wool, from the undercoat of the Cashmere (or Kashmir) goat, is indeed a premium fiber that generally commands a much higher price than sheep's wool.

If you manufacture or sell clothing or household items that contain any wool, including specialty wools like cashmere, camel hair, mohair, alpaca, llama, or vicuna, you must comply with the Wool Products Labeling Act. That means your product labels must accurately reflect the items' fiber content, the country of origin, and either the name or registered identification number (RN or WPL number) issued by the FTC to the manufacturer or marketer. Labels on apparel items also must show a safe cleaning method.

Not all fibers from the Cashmere goat are considered cashmere under the Wool Act. Under the Act, the term "cashmere" can be used to identify fiber content only if:

- the fiber consists of the fine (dehaired) undercoat fibers produced by a Cashmere goat (*capra hircus laniger*);
- the average diameter of the cashmere fiber does not exceed 19 microns; and
- the cashmere fibers in the wool product contain no more than 3% (by weight) of cashmere fibers with average diameters that exceed 30 microns.

The average fiber diameter may be subject to a coefficient of variation around the mean that shall not exceed 24%. Fibers from a Cashmere goat that do not meet this definition should have a label that identifies them as wool.

Fiber Content Disclosure

Product labels must reflect the true fiber content of the item. For example, if a sweater is made of wool, it can be labeled as 100% Wool, assuming it contains only wool. Likewise, if a sweater is made only of cashmere as defined in the Wool Act, it can be labeled as 100% either 100% Wool or 100% Cashmere. If a sweater contains cashmere mixed with sheep's wool and the label refers to cashmere, the label must accurately disclose the content, for example, 80% Wool, 20% Cashmere. It would be illegal to say simply Cashmere or Cashmere blend without stating the percentages. One

exception to the requirement that percentages be stated: the word All can be used in place of 100% if the product is made of only one fiber; for example, All Wool or All Cashmere.

If a claim about the fiber content appears elsewhere on the garment, say a sleeve label, it must mirror the garment's fiber content label. For example, a coat labeled 50% Cashmere, 50% Wool cannot have a sleeve label stating only FINE CASHMERE GARMENT or FINE CASHMERE BLEND. In this instance, the sleeve label also must say 50% Cashmere, 50% Wool — in equally conspicuous lettering.

The amended Wool Rules allow hang-tags that identify fibers including cashmere, but that don't disclose the item's full fiber content if:

- the item has a label that includes the required fiber content statement, and
- the hang-tag tells consumers to see the label for the full fiber content, or states that it doesn't disclose the product's full fiber content.

These disclosures aren't required if the garment contains only one fiber and the hang-tag identifies that fiber.

The Textile Act allows a 3% tolerance for fiber content claims, but the Wool Products Labeling Act doesn't. However, the Wool Act says that deviation from the stated fiber content is not considered mislabeling if it results from "unavoidable variations" in the manufacturing process that occur despite the exercise of due care. For this reason, the FTC generally applies the 3% tolerance to wool products. The 3% tolerance does not allow for intentional mislabeling. There is no tolerance for a 100% claim, because the addition of another fiber would be intentional.

Testing is Important

You're responsible for the accuracy of the label, even if you import, distribute or sell wool products manufactured by another company. You can't necessarily rely on an invoice statement that the goods contain a specified amount of cashmere. Routine testing of fiber contents by a qualified, independent testing lab is the best way to assure accurate labels.

A trained expert using an optical or electron microscope can distinguish between cashmere fibers and sheep's wool fibers, following procedures established by the American Association of Textile Chemists and Colorists (AATCC) or the American Society for Testing and Materials (ASTM). The basic distinction is not only of diameter: some sheep produce ultra-fine fibers with a diameter comparable to that of cashmere fibers. Significant differences exist in the scale structure of the two fibers, as well, and that's what the test expert looks for.

Guaranty of Compliance

If you buy and resell wool or cashmere products, ask your U.S. supplier for a "guaranty of compliance." The guaranty is a written statement on a product invoice or other dated document that states: "We guarantee that the wool products specified herein are not misbranded under the

provisions of the Wool Products Labeling Act and rules and regulations thereunder."

The supplier is guaranteeing that the wool and cashmere products sold to you are labeled correctly according to the Wool Labeling Act. The guaranty must have the name and address of the guarantor. A "continuing guaranty," which covers all wool products sold by the guarantor, also can be filed with the FTC. Filing such a guaranty is an assurance by the guarantor that all its products covered by the Wool Act are labeled correctly. A buyer who relies in good faith on a properly executed guaranty will not be found in violation of the law if the goods are later determined to be mislabeled. Good faith means acting prudently and not ignoring an indication (like price or appearance) that an item may not be labeled accurately.

The FTC revised the form for filing continuing guaranties. You don't need to refile continuing guaranties that were filed using the old form. If you need to update your contact or business status information, use [FTC Form 31-A](#).

A special note about guaranties and foreign companies: A foreign company cannot file a continuing guaranty with the FTC, and a guaranty from a foreign company is not a legal defense if the importer is charged with mislabeling products. A U.S. importer is legally responsible for the proper labeling of imported textile and wool products. Importers should test the fiber content of imported goods periodically to verify the accuracy of the label.

The Commission's [enforcement policy statement](#) provides that it will not bring enforcement actions against retailers that:

1. cannot legally obtain a guaranty under the Wool Act
2. do not embellish or misrepresent claims provided by the manufacturer related to the Act or Rules
and
3. do not market the products as private label products, unless they knew or should have known that the marketing or sale of the products would violate the Act or Rules.

How Posh is Pashmina?

The popularity of products marketed as pashmina — an Indian word for cashmere — has soared in recent years, yet most consumers aren't sure what pashmina is. That's not surprising, as pashmina is not a labeling term recognized by the Wool Act and Rules. Experts tell the FTC there is no pashmina fiber that is separate and distinct from the cashmere fiber.

Some manufacturers use the term pashmina to describe an ultra fine cashmere fiber; others use it to describe a blend of cashmere and silk. The FTC encourages manufacturers and sellers of products described as pashmina to use a hang-tag or other mechanism to explain to consumers what they mean by the term.

The fiber content of a shawl, scarf or other item marketed as pashmina must be accurately disclosed. For example, a blend of cashmere and silk might be labeled 50% Cashmere, 50% Silk, or 70% Cashmere, 30% Silk, depending upon the actual cashmere and silk content. If the item contains only

cashmere, it should be labeled 100% Cashmere or All Cashmere. The label cannot say 100% Pashmina, because pashmina is not a fiber recognized by the Wool Act or regulations.

Other Label Requirements

The label must state the country of origin and the identity — either name or RN — of the manufacturer or other business responsible for marketing the item, and the fiber content. Read more about labeling textile and wool products in [Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts](#).

Care Labels

Apparel care labels are required under the FTC's Care Labeling Rule, explained in [Clothes Captioning: Complying with the Care Labeling Rule](#).

Labels that say Dry Clean Only tell consumers that the item can't be washed safely. To be accurate, you must have proof that the garment will be harmed by washing. The truth is that many cashmere items can be washed safely at home. A label that says Dry Clean does not warn against washing and does not require proof that washing would harm the item.

For clothing that may be washed or dry cleaned, you must give instructions for at least one cleaning method. But consumers are telling the FTC they want information about both cleaning methods.

For More Information

If you have questions about the Textile, Wool and Fur Acts and Rules, see [Legal Resources](#).

For more information about cashmere and other specialty wool products, contact:
Cashmere & Camel Hair Manufacturers Institute, 3 Post Office Square, 8th Floor Boston, MA 02110;
www.cashmere.org

Your Opportunity to Comment

The National Small Business Ombudsman and 10 Regional Fairness Boards collect comments from small businesses about federal compliance and enforcement activities. Each year, the Ombudsman evaluates the conduct of these activities and rates each agency's responsiveness to small businesses. Small businesses can comment to the Ombudsman without fear of reprisal. To comment, go to www.sba.gov/ombudsman.

July 2014