

What are Organic Fiber Products and How Can You Label Them?



Increasingly, companies are making apparel, home textiles, and fiber-based products such as mattresses that include organic cotton, organic wool, or other organic fiber. The U.S. Department of Agriculture's National Organic Program (USDA's NOP) on May 20, 2011, issued a [Policy Memorandum](#)¹ that clarifies how such organic fiber-containing products may be labeled. Below is an overview of the definitions and permissible claims companies using organic fibers may use. **The bottom line is that finished or processed textile products that imply or lead the consumer to believe that the final product is certified organic must meet either the USDA organic regulations or the Global Organic Textile Standard (GOTS).**

What is organic fiber? Organic fiber includes cotton, wool, hemp, flax (linen), and other natural fibers grown according to national organic standards without the use of toxic and persistent pesticides, synthetic fertilizers, or genetic engineering. USDA-accredited third-party certification organizations verify that organic producers use only permissible methods and materials in organic production.²

What is the Global Organic Textile Standard (GOTS)? The Global Organic Textile Standard (GOTS) is the stringent voluntary international standard for the processing of organic fiber-containing products, addressing all the post-harvest processing stages (including spinning, knitting, weaving, dyeing and manufacturing). It includes both environmental and social provisions for post-farm to retail shelf management. Key provisions include a ban on the use of child labor, genetic engineering, heavy metals, and highly hazardous chemicals such as formaldehyde, while requiring living wages and strict wastewater treatment practices.

What is the difference between the NOP and GOTS standards? NOP sets the standards for agricultural products including products made from organic fiber. However, its post-harvest processing standards only apply to food, not fiber. GOTS, on the other hand, sets standards for the post-harvest processing of consumer fiber products made with certified organic fibers. For GOTS-certified consumer products sold in the United States, the organic fibers used must be certified to the NOP standards. With both complementary certifications, a product can be considered "organic" from field to finished product in the United States. At this time, GOTS is the only third-party organic certification system for fiber products that is explicitly recognized by NOP.

What kinds of claims can be made on organic fiber products? According to NOP, while its regulations do not include specific processing or manufacturing criteria for textile products, organic fiber-containing products may be labeled as “organic” and make reference to NOP certification **if they are produced in full compliance with both the NOP production standards (crops and livestock for raw materials) and the NOP handling standards** (processing of the finished product). This includes all processing methods allowed under 7 CFR 205.270 and all ingredients and inputs allowed under 205.605 and 205.606 of the National List. However, given that most of these methods and ingredients are more applicable to food processing versus textile processing, NOP labeling alone is unachievable for most finished products.

An NOP-recognized and more practical option is that organic fiber-containing products **may be sold as “organic” in the United States if their manufacture has been certified to GOTS**. While it may display the GOTS seal, the label may not refer to NOP certification or display the USDA Organic seal. GOTS certification requires that **all** processing stages through manufacturing of the finished product take place in GOTS-certified facilities, and all B2B traders involved in the supply chain of GOTS-certified products must be certified to GOTS themselves. Manufacturers may not make a claim that their products are GOTS-certified if only certain components (such as batting or fabric) are certified to the standard. Only if these certification requirements are met may a GOTS-certified entity apply the GOTS label (including the GOTS seal) to a final product and claim in promotional materials that its products are GOTS-certified.³

Note that NOP labeling requirements are in addition to those required by the [Federal Trade Commission \(FTC\) labeling requirements](#), including “truth-in-labeling” requirements. Thus, processed textile products not certified to a recognized standard such as NOP or GOTS may include an organic fiber content claim provided that the specific fiber is certified to NOP regulations. However, as “made *with* organic (specified ingredient)” is a codified labeling category under NOP as well as a labeling category under GOTS, textile manufactures choosing to make a fiber content claim in accordance with the FTC labeling requirements - but whose products do not meet the NOP or GOTS standards - should use terminology such as “contains 80% organic cotton,” and may not use the phrase “made *with*.”⁴ OTA suggests that companies that cannot be certified to GOTS or NOP get certified to [Textile Exchange’s Organic Content Standard](#) to fully verify their claims.

What are the GOTS requirements for accessory components of a consumer product? GOTS permits non-organic accessory components (fiber and non-fiber) in organic consumer products (e.g., wood or shell buttons on a blouse, an innerspring or barrier fabric in a mattress). However, all such accessory components must meet certain material requirements, and may not contain harmful or toxic characteristics prohibited in the standard.

How can consumers identify a correctly GOTS-certified and labeled product? Consumers should look for the on-product labeling. GOTS labeling must be applied on the product in such a way that it is visible to the consumer at the time of purchase (e.g., on the packaging and/or hangtag and/or a label).

Correct and complete GOTS labeling shows the trademark-registered GOTS logo (or the lettering 'Global Organic Textile Standard'), the GOTS label grade ('organic' or 'made with organic'), reference to the certification body, and the license number and/or name of the certified entity. Because retailers are not required to become certified themselves, correct labeling may show the license number and/or name of their supplier (trader, manufacturer) of the final product. Consumers (and the supply chain) can look up the data of the certified entity by entering the license number (or name) provided on the GOTS labeling in the 'free text field' of the publicly available [GOTS database](#). Only this correct GOTS labeling provides the assurance for the consumer that the final product is GOTS-certified.

Note that products referencing GOTS but identified, advertised, or offered for sale **without the required labeling** are not considered GOTS-certified. The precondition for on-product label use of the GOTS name is that both the **entire value chain and the final product are certified**. Claims used on organic fiber-containing products or in promotional literature, such as "this shirt/bedding/mattress uses GOTS-certified cotton yarn or fabric," are solely the claims of the seller, and have not been verified by the GOTS certification process.

¹ [USDA National Organic Program, Labeling of Textiles that Contain Organic Ingredients, May 20, 2011.](#)

² [Organic Trade Association, Organic Cotton Facts.](#)

³ [International Working Group on Global Organic Textile Standard, How to Get Products Labeled.](#)

⁴ [Organic Trade Association, USDA OK's Organic Textile Labeling Including GOTS – Press Release, June 7, 2011.](#)

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