

## **U.S. & Canada Product Labeling Requirements**

The guidance in this document is for informational purposes only and it is the responsibility of the vendor, seller, or importer to adhere to all applicable local legal regulations.

### **U.S. Regulations**

This is a summary of the most basic legal requirements for labeling in the United States, for the types of merchandise most commonly purchased by Foot Locker for stores in the United States. This does not address details such as the size or visibility of fonts or labels, or the appropriate places for labels.

#### **Country of Origin**

The country-of-origin marking is required on all commodities and must be in accordance with all US Customs regulations. The marking must be in English, permanent, legible and conspicuous to the consumer. The country-of-origin marking must not be obstructed by tags, tickets or packaging. Any item individually packaged in individual polybags (that are sold in a polybag) must have the country-of-origin labeling on the bag, if it is not on the item and visible through the bag. If the letters USA or similar wording or a place name in the United States exists on the items packaging or exterior, the country-of-origin marking must be comparable in size, so as not to mislead the consumer. The country-of-origin marking must appear in the following places, for the following commodities:

##### Footwear

The following sites are acceptable for country-of-origin marking on footwear (both shoes must be marked):

- one inch from inside top of tongue
- near inside topline
- heel seat
- sole
- arch
- side of tongue if near top

In addition, the country-of-origin can be indicated on the end of the individual sale carton where the SKU label, price tag, or other information is provided

##### Shirts, Sweaters, Jackets, Tops, Coats, and upper body garments

A label sewn or printed into the garment at the center of the nape of the neck

##### Trousers, Shorts, and other Bottoms

A label sewn or printed into the waistband of the pants at the center of the back of the waist

##### Socks, Hosiery

On the tag or label on the outside of the pair of socks or the front of the package

##### Accessories & Other commodities

Appearing in the same vicinity as the bar code tickets

If not near bar code, then indicated legible and conspicuous location

**Federal Trade Commission RN Identification**

Foot Locker's RN number is 69778

In addition to country-of-origin marking, apparel items require fabric content and care instructions to be visible. All content and care instructions must be in accordance with the accepted Federal Trade Commission standards (FTC). Registry Number (RN) must be visible.

***Any questions related to product marking should be addressed to the International Trade Department's Compliance Contacts in Section 14.***

**Pre-Packaged, Non-Food Consumer Products (including Cosmetics)**

Basic Requirements: The Fair Packaging and Labeling Act (FPLA) requires each package of household "consumer commodities" that is included in the coverage of the FPLA to bear a label on which there is:

- a statement identifying the commodity, e.g., detergent, shoe polish, etc.
- the name and place of business of the manufacturer, packer, or distributor.
- and the net quantity of contents in terms of weight, measure, or numerical count (measurement must be in both metric and inch/pound units).
- Cosmetics require additional consideration as the label statements required under the authority of the Federal Food, Drug, and Cosmetic Act (FD&C Act) must appear on the inside as well as any outside container or wrapper

For additional information visit –

[Fair Packaging and Labeling Act: Regulations Under Section 4 of the Fair Packaging and Labeling Act | Federal Trade Commission](#) and  
<https://www.fda.gov/cosmetics/cosmetics-labeling/cosmetics-labeling-regulations>

**Hazardous Products**

Certain consumer chemical products require danger, warning and caution labels for products that are corrosive, explosive, flammable or poisonous. (see section 8-1)

For further information please refer to both DOT & OSHA regulation standards:

<https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-regulations>  
<https://www.osha.gov/hazcom>

**Precious Metals**

If jewelry is marked with a quality mark (e.g., “.925” for sterling silver), then the following notes of the CFR16 CFR § 23.10 must be followed:

Note 1:

Legibility of markings. If a quality mark is engraved or stamped on an industry product, or is printed on a tag or label attached to the product, the quality mark should be of sufficient size type as to be legible to persons of normal vision, should be so placed as likely to be observed by purchasers, and should be so attached as to remain thereon until consumer purchase.

## Note 2:

Disclosure of identity of manufacturers, processors, or distributors. The National Stamping Act provides that any person, firm, corporation, or association, being a manufacturer or dealer subject to section 294 of the Act, who applies or causes to be applied a quality mark, or imports any article bearing a quality mark "which indicates or purports to indicate that such article is made in whole or in part of gold or silver or of an alloy of either metal" shall apply to the article the trademark or name of such person. 15 U.S.C. 297.

For further information please refer to - <https://www.ftc.gov/news-events/topics/tools-consumers/jewelry-guides>

**Upholstered and Stuffed Articles**

Dealers, importers, and manufacturers must comply with U.S. federal labelling requirements as well as any other consumer product safety and protection laws. It is important to note that some states require registration, and sterilization permits with potential special format of labeling rules.

The fibre composition of an article's stuffing or filling must be disclosed on the federal label *unless the filling or stuffing is used in one of the following articles:*

- Linings, interlinings, filling or padding used for structural purposes. *If used for warmth, though, the fiber must be disclosed. **In addition**, if you state the fiber content of linings, interlinings, filling or padding, the products are not exempt.*
- Stiffenings, trimmings, facings or interfacings
- Sewing and handicraft threads
- Shoes, overshoes, boots, slippers and all outer footwear. (Socks and Hosiery are covered under the act); slippers made of wool are covered under The Wool Rules.
- Headwear, including hats, caps or anything worn exclusively on the head. Wool hats are covered under The Wool Rules.
- Textiles used in handbags or luggage

For more information please refer to - <https://www.ftc.gov/business-guidance/resources/threading-your-way-through-labeling-requirements-under-textile-wool-acts#fiber>

## Canadian Regulations

This is a summary of the most basic legal requirements for labeling in Canada, for the types of merchandise most commonly purchased by Foot Locker for stores in Canada. This does not address details such as the location, size or visibility of fonts or labels, or the appropriate places for labels.

For more detailed information, contact the appropriate government ministry, which for most issues is Industry Canada. The exceptions are for laws on cosmetics and hazardous products (contact Health Canada), upholstered and stuffed articles (contact provincial governments), and country-of-origin (contact Revenue Canada, Customs Office).

Please note, generally, that labels for apparel, socks; pre-packaged, non-food consumer products (including cosmetics); and footwear must include a statement as to the country-of-origin (e.g., “Made in China”). ***This statement must be printed in both English and French.*** Please read below on additional labeling requirements for Canada.

### Apparel/Socks

#### Fiber Content

- Include the generic name of each fiber present, in an amount of 5% or more, as a percentage of total fiber mass of the article, in order of predominance
- This information, as well as descriptive terms used in conjunction with the fiber content, must be printed in both English and French

#### Dealer Identification

- Include the CA number or name and postal address of any one of the manufacturer, processor, finisher, retailer, importer or seller
- Foot Locker’s CA number is 40393

#### Care Labeling

- Although care instructions are not required by law, any use of “Canadian Care Symbols” must comply with the “Canadian Care Labeling Program”. US and Mexican care symbols may be used if words are included, they must be in both English and French.

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## Pre-Packaged, Non-Food Consumer Products (including Cosmetics)

#### Product Identity Declaration

- Include the generic product description, and print it in both English and French
- For cosmetics, this must appear on the product container, rather than just on the box or other outer packaging

#### Declaration of Net Quantity

- Include an expression of volume, weight or numerical count, and print it in both English and French (A metric net quantity declaration using metric symbols is considered bilingual)

### Dealer's Name & Principal Place of Business

- Include the name of the person by or for whom the pre-packaged product was manufactured or produced for sale, and an address sufficient for postal delivery (A postal code alone is not enough)
- If the dealer is Foot Locker Canada, print the full corporate name in English and French
- For cosmetics, this must also appear on the product container, rather than just on the box or other outer packaging
- For accessory items, self-adhesive sticker displaying "Imported by..." must be visible on bottom left corner or back of packaging

### **Hazardous Products**

Certain consumer chemical products require danger, warning and caution labels for products that are corrosive, explosive, flammable or poisonous. (see section 8-1)

### **Precious Metals**

If jewelry is marked with a quality mark (e.g., ".925" for sterling silver), it must also be marked for identification purposes with a trade-mark that is registered with the Canadian Trade-Marks Office. The trademark may belong to the manufacturer, importer, wholesaler or retailer.

Please refer to the Precious Metals guidance from the Canadian Competition Bureau for further direction <https://competition-bureau.canada.ca/en/labelling/guide-precious-metals-marking-act-and-regulations>

### **Upholstered and Stuffed Articles**

Recent provincial changes regarding stuffed or filled articles do not affect the Textile Labelling Act (TLA) and Textile Labelling and Advertising Regulations (TLAR). Dealers must comply with federal labelling requirements as well as any other consumer product safety and protection laws. In Canada, a federal label refers to mandatory labeling requirements that apply to all food and non-food products sold across the country.

Items generally fit into three broad categories:

1. Outer covering and shell - the fibre content of an article's outer covering and shell must always be disclosed on the federal label. Examples of articles with an outer covering or shell include pillows, mattresses, and winter jackets.
2. Findings: Findings are textile fibre parts added to a textile article for a functional purpose other than filling, stuffing or providing warmth. Examples include zippers or padding. These **do not require** disclosure of fibre content on the federal label. However, if a dealer chooses to make a claim or representation about the findings (e.g. "the padding in this costume is made entirely of polyester"), then the fibre contents of the findings must be disclosed on the federal label. This does not apply if the representation is made as part of a provincial label. Linings and interlinings used for warmth are **not findings** and their fibre composition **must** be stated on the federal label.
3. Stuffing or filling

The fibre composition of an article's stuffing or filling must be disclosed on the federal label *unless the filling or stuffing is used in one of the following articles*:

- mattresses
- box-springs
- cushions
- chair pads
- pot holders
- oven mitts
- place mats
- mattress protectors, or
- upholstered furniture

However, if a dealer chooses to make a claim or representation about stuffing or filling used (e.g. "this pillow is stuffed with cotton wadding") in one of the above articles, then the fibre content of the stuffing or filling must be disclosed on the federal label. This does not apply if the claim or representation is made as part of a provincial label.

Please refer to the stuffing/filling guidance from the Canadian Competition Bureau for further direction <https://competition-bureau.canada.ca/en/labelling/textile-labelling/guide-labelling-stuffed-or-filled-textile-articles>

### **Québec's Charter of the French Language**

Certain amendments to Québec's *Charter of the French Language* ("Charter") and the *Regulation respecting the language of commerce and business* are now in force. These amendments update the existing French translation requirements, including by revising the rules on the use of trademarks in:

- packaging and labelling of merchandise sold in Quebec; and
- commercial advertising and signage visible to the Quebec public.

Although in this document we provide a summary of these changes, and outline Foot Locker's expectations with respect to ensuring compliant merchandise and related promotional displays, we encourage you to consult your legal advisors to confirm compliance.

#### Changes to packaging and labelling

Effective **June 1, 2025**, the Charter requires that any generic term or product description included in a trademark found on a product or its packaging (including any accompanying materials) must appear in French, in an equally prominent manner, unless the trademark is the name of a business or the name of the product as sold.

Merchandise that does not meet the above requirements may continue to be sold in Foot Locker stores until **June 1, 2027**, if:

- the merchandise was manufactured before June 1, 2025; and
- a French version of the applicable trademark was not registered in Canada as of June 25, 2024.

The Office québécois de la langue française (OQLF), the Quebec French language authority, has published guidance to help businesses comply with these requirements. You can access this guidance (which is available only in French) here:

<https://www.oqlf.gouv.qc.ca/francisation/entreprises/marque-commerce-produits.html>

#### Changes to promotional materials accompanying merchandise

Under pre-existing French translation requirements, all text (with the exception of trademarks) on signs and posters, such as floorstands, must be in French or in French and another language. Effective from **June 1, 2025**, in cases where both French and another language are used, the French text must be markedly predominant, where the French text has a much greater visual impact within the same visual field. This requires that the following conditions be met:

1. French text occupies at least twice the space of the other language;
2. French text is equally legible and permanently visible; and
3. The “same visual field” refers to an overall view where all the components of the signs and posters are visible and legible at the same time without having to move.

Additional guidance from the OQLF (available only in French) can be accessed here:

<https://www.oqlf.gouv.qc.ca/francisation/entreprises/Affichage-marques-commerce-noms-entreprises.pdf>

Please note that vendors who provide non-compliant merchandise to Foot Locker, to be sold in the Province of Québec, will be in violation of the Charter.