



Bureau de la
concurrence

Competition
Bureau

Télécopieur-Facsimile (819) 994-2240
Téléphone-Telephone (819) 953-3647
Internet: marcus.pat@ic.gc.ca

Direction des pratiques
loyales des affaires

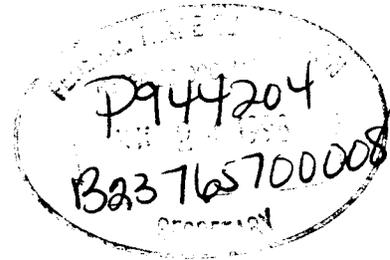
Fair Business Practices
Branch

Place du Portage I
50, rue Victoria
Hull (Québec)
K1A 0C9

Place du Portage I
50 Victoria Street
Hull, Québec
K1A 0C9

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ORIGINAL



Office of the Secretary
Federal Trade Commission
Room H-159
Sixth Street and Pennsylvania Avenue N.W.
Washington, D.C. 20580
U.S.A.

**Re: Trade Regulation Rule on Care Labelling of Textile Wearing
Apparel and Certain Piece Goods
16 CFR Part 423 - Comment**

This is in response to the request for comment by the Federal Trade Commission (FTC) regarding a number of proposals to amend the Trade Regulation Rule on Care Labelling of Textile Wearing Apparel and Certain Piece Goods.

This Federal Registry Notice includes amendments and proposed amendments to the Rule on Care Labelling. In some instances these proposals will impose new and/or different regulatory requirements on Canadian dealers choosing to offer their goods for sale in the United States. For this reason many of the regulatory proposals outlined in the Request for Comments should be discussed in detail by the Subcommittee on Labelling of Textile and Apparel Goods pursuant to Annex 913-5.a-4 of the NAFTA before they are made regulation.

A Requiring Instructions for Cleaning in Water

1. *Consumer interpretation of "dry clean" to mean "Do not wash"?*
 - While we assumed that the majority of Consumers interpret "dry clean" to mean "do not wash", empirical data to support such an assumption is not available.

In Canada, every effort is made to educate consumers to follow care instructions and assume nothing. In fact, Section 1.5 of the National Standard of Canada - Care Labelling of Textiles clearly states that the lack of a particular instruction should not be interpreted to mean that the particular procedure represented by the missing symbol is safe for the article.

2. *Number of domestic businesses providing Wet cleaning services ?*
 - It is estimated that only 10 to 15% of the approximately 3000 to 3500 dry cleaning businesses in Canada provide wet cleaning services.

3. *Should the "Professional Wet Cleaning" instruction be allowed alone in labelling or should it appear with another cleaning instruction.*
 - Although it is desirable that only the most preferred method of care be identified in labelling, in the case of "wet cleaning", it is recommended that more than one care option be provided to the consumer until such time that "wet cleaning" services are more widely provided.

B The reasonable Basis Requirement of the Rule

4. *Should the Rule for "reasonable basis" be expanded to address the whole garment?*
 - While there is benefit to having reliable evidence that the components of an article can be cleaned according to the care instructions, it is important that for made-up textiles there be reliable evidence that the "whole" or complete article including all components can be cleaned according to the care instructions. How do the many components of an article or garment interact with one another during cleaning? Is there any evidence of differential shrinkage, colourfastness, etc.?

Section 5.1.1 of the National Standard of Canada - Care labelling of Textiles states clearly that for made-up textiles, the restorative treatments recommended by the care symbols must apply to the complete textile article including all components. However, in the case of removable components that cannot withstand the recommended restorative treatment (such as trim), it is permissible to use the care symbols providing that the component to which the symbols do not apply is clearly indicated on the care label or on a separate label securely attached to or near the care label, e.g. "Care instructions not applicable to removable trim".

D. *Definitions of Water Temperatures*

5. *How can consumers be made aware of approximate water temperatures and how these temperatures correlate to the "cold", "warm" and "hot" buttons on their washing machines?*

- There are two schools of thought on this issue; 1) that symbols should contain temperature markings and 2) that symbols should identify the words "hot", "cold" or "warm" as represented on domestic washing machines.

When faced with the task of doing laundry, the average consumer pushes either the "hot", "cold" or "warm" indicators on their washing machine. As a general rule laundry is sorted - darks, whites and colours and washed in the most appropriate temperature for the particular load. Consumers do not associate an actual water temperature to the "cold", "warm" and "hot" buttons on their washing machines nor do they measure the actual temperature of the water going into the washing machine. There have been numerous discussions regarding the use of terminology and associated temperatures, e.g. cool vs cold, lukewarm vs. warm, hot vs. warm, cold = 20°C or 30°C, and hot = 60°C or 70°C, etc.. In addition, it must be recognized that individual water temperatures are affected by a number of factors including geographical and seasonal temperatures, hot water utilization and preset and adjusted settings on hot water tanks. Therefore, while it may be beneficial to the consumer for labels which indicate either "cold", "warm" and "hot", indicators which relate to the markings on their washing machines, it will be difficult to determine and control standard water temperatures.

While standard water temperature markings are of little benefit or interest to the consumer, they are imperative for duplicating wash conditions for testing purposes. It should be noted, however, that the same concerns regarding standardized water temperatures apply equally to the use of temperature markings in symbols.

6. *Washing in "very hot" water.*

- What is "very hot" water? What temperature is "very hot" and are domestic washing machines capable of achieving those temperatures? Given standard domestic washing conditions, consumers are unlikely to use "very hot" water under normal washing conditions unless there was a specific "very hot"

indicator on their washing machine. Without specific direction to the fact, it is improbable that consumers would conclude that they should employ the services of a professional cleaner when "very hot" water is indicated in labelling. Consumers would likely choose to use the "hot" setting on their washing machine, rather than employ costly laundering services.

Should you require clarification or wish to discuss these issues in further detail, please contact me directly at (819) 953-3647.

Yours sincerely,



Pat Marcus
Program Officer

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