

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580

Dear Secretary,

The Environmental Protection Agency offers these comments concerning proposed amendments to 16 CFR Part 423, Care Labeling of Textile Wearing Apparel and Certain Piece Goods, As Amended. We share the Federal Trade Commission's overall goals of increasing consumer information on fabricare options, and ensuring consumer awareness of environmentally-preferable fabricare processes. EPA welcomes the chance to have input to your proposed Care Labeling Rule amendments. **We support the increased accuracy of care label instructions, in particular requiring a home laundry instruction where appropriate. We are also supportive of specific instructions addressing environmentally-preferable cleaning technologies.**

Through our Design for the Environment Program (DfE), EPA has supported the development of cleaner technologies for a number of industries, including drycleaning. As a result of our concern over adverse effects from exposures to traditional drycleaning solvents, especially perchloroethylene, EPA established the DfE drycleaning project in 1992. The primary focus of that project has been to encourage cleaners to consider environmental impacts, along with traditional parameters of cost and performance, when making business decisions and process choices.

EPA has been pleased to see new cleaning technologies come on line in the past five years. The success of professional wetcleaning, and the increasing number of drycleaners now offering wetcleaning services, attest to the continuing penetration of wetcleaning in the fabricare market. It is a demonstrated effective and viable technology that is here to stay. We are also pleased to see another new technology, liquid carbon dioxide, join professional wetcleaning in offering cleaners another process choice that is environmentally preferable to traditional cleaning solvents. This growing incorporation of cleaner technologies furthers EPA's stated goals of pollution prevention and toxics reduction.

EPA supports professional wetcleaning as an established technology choice for cleaners, and recommends FTC amend its Care Label Rule to require a "Professionally Wetclean" instruction on care labels when appropriate. The requirement of such a care instruction is both advisable and timely, and will serve to further promote the growth of professional wetcleaning services, and enhance the protection of public health and the environment through pollution prevention.

We support rapid progress on the development of a standard definition and test protocol for professional wetcleaning in order to expedite the implementation of this new instruction by garment manufacturers. We believe the standard definition and test protocol can be developed by an appropriate standard-setting organization, such as the Association for Standards of Technical Materials (ASTM), or the American Association of Textile Chemists and Colorists (AATCC), in a sufficiently reasonable time period to allow the FTC to move ahead with the implementation of a "Professionally Wetclean" instruction requirement. The standard definition should address key elements including the type of equipment required, the necessary process control technology, and in particular, the use of specialized detergents and additives that have been specifically designed for professional wetcleaning.

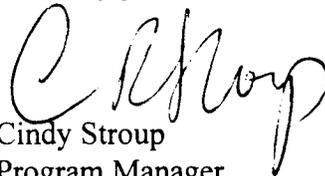
Since EPA does not wish to see any one environmentally-preferable technology gain unfair advantage over another, EPA urges the FTC to include in their current amendments to the Care Labeling Rule, a fast-track process for periodic updating to add instructions for new environmentally-preferable technologies as they become established commercial choices for cleaners. Requiring care label instructions on environmentally-preferable processes will provide an important boost to consumer acceptance and knowledge of these processes. EPA commits to working with the FTC to identify additional qualifying clean technologies.

One such technology is the new **liquid carbon dioxide-based cleaning system**, which is now commercially available in the U.S. This environmentally-preferable technology is moving quickly into the marketplace and demonstrates much promise. **EPA urges the FTC to begin the process to develop a standard definition and test protocol, and eventually a "Liquid Carbon Dioxide Process" care label instruction requirement.**

EPA believes that the more information consumers have, the better equipped they will be to make choices about the care and cleaning of their garments. These new care instruction requirements will encourage garment manufacturers to recommend the use of cleaner technologies, which will better serve consumers, professional cleaners, and the environment.

Again, thank you for the opportunity to comment on your proposed amendments to the FTC Care Labeling Rule. If you have any questions about our comments, feel free to call me at (202) 260-3889.

Sincerely yours,



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