



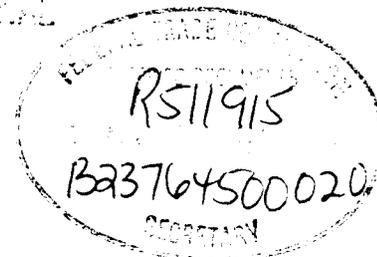
INTERNATIONAL FABRICARE INSTITUTE

The Association of Professional Drycleaners and Launderers

February, 23, 1999

Secretary
Federal Trade Commission
6th & Pennsylvania Ave NW
Washington, D.C. 20580

ORIGINAL



Re: 16 CFR Part 423 - Care Label Rule

The International Fabricare Institute is a worldwide trade association representing drycleaners, launderers and wetcleaners. IFI has a membership of approximately six thousand fabricare plants which represents approximately half of the estimated fabricare plants in the United States.

IFI appreciates the FTC extending the comment period to March 1, 1999 so that we may comment on issues raised January 29, 1999 roundtable. We would encourage the FTC to extend the comment period to allow for continuation of the dialogue which began at the FTC workshop. We believe that this dialogue between parties vitally engaged in the processes of design, manufacturing, distribution and servicing of textile products along with representatives of academia, consumer advocacy and the regulatory agency could produce a Care Label Rule of enormous benefit to the consumer. But the workshop took place only one month before the record is to be closed. Time is needed for networking to mature to a stage where compromise and consensus can occur, and the resultant Care Label Rule, although a mandate, will be strengthened by having been derived through collaborative effort.

IFI would like to comment on the two specific issues raised by the FTC and discussed at the roundtable namely a mandatory home washing label and wetcleaning care label.

Should the Rule be amended to require a washing instruction for all items that can safely be washed at home, even if drycleaning would be an appropriate alternative care method?

The fabricare industry supports alternative care labeling which provides the consumer with all appropriate methods of care. The industry is opposed to the Commission limiting care labeling to only one appropriate method of care.

Alternative labeling

- ◆ provides full disclosure to consumers.
- ◆ can be provided at minimal cost.
- ◆ puts the United States on par with the European community.
- ◆ allows for development of labeling for new fabricare methods such as wetcleaning.

Alternative labeling provides full disclosure of fabric care options which allows the consumer to make informed choices. This is in keeping with the FTC's goal which is outlined in its mission statement:

"the Commission's efforts are directed toward stopping actions that threatens consumers' opportunities to exercise informed choice."

The FTC did commission Clorox Co. to conduct a consumer survey; however, the fabricare industry takes issue with much of the data presented and believes that an additional consumer survey is required to provide the FTC with sufficiently broad information to determine consumer care label preferences. Clorox asked only whether consumers wanted to know when a garment can be home washed. The question should have been "Would you like to know if a garment can be washed or drycleaned, would you like to know all appropriate methods of care?" Additionally, the survey should assess whether the consumer believes that the listing of one care instruction means that all other care methods would damage the garment i.e., If the label states washable, does that mean it cannot be drycleaned?

Also, the data presented by Clorox that 52.5% of consumers launder dryclean labeled garments can easily be misinterpreted. Clorox did not address garment type or the number of garments to elicit an objective response. Was it the hand washing of an inexpensive silk blouse, an old pair of pants that were no longer suitable for dress wear? It is doubtful that the consumer would home launder a cherished wool suit jacket or a "perfect fit" pair of slacks, for fear of the results. It is important to note that two-fifths of the individuals in the survey were not happy with the results when they laundered a dryclean labeled garment.

The fabricare industry pledges to work to develop a survey which gives an accurate, unbiased assessment of consumer preference. The survey should be agreed upon by a working committee comprising representatives from the FTC, apparel manufacturers, consumers' advocacy, fabric care industry and other interested parties.

Alternative labeling can be provided at reasonably low cost since the Care Labeling Rule does not require testing for a manufacturer to have a "reasonable basis" for the care information provided. The rule allows for manufacturer knowledge, past experience, etc. to be the foundation for "reasonable basis." But, even if testing were mandatory, the cost is relatively inexpensive. The IFI's Textile Testing Laboratory can develop a full set of care instructions for less than \$300.00. These fees are comparable to those of other independent labs. For manufacturers with large production runs, (which are the ones supplying the majority of the consumers), the cost would be pennies per garment sold. For haute couture and small specialty manufacturers the cost per item would be somewhat higher. In either case the consumer is better served and the manufacturer is better protected against claims from retailers, consumers and cleaners regarding serviceability issues.

Additionally, the FTC and the textile industry could develop a list of garment types which would be excluded from labeling for multiple methods such as undergarments, hosiery, children's sleepwear, etc. This would apply, as well, to those garments which could be laundered but are better served by professional care to prevent dye loss or require special finishing.

Alternative labeling puts the United States on the same level as the European community which with the use of the Ginetex symbol system, requires all appropriate care information to be given to consumers. And since the FTC now permits the use of the ASTM care symbols without written words, addressing all appropriate methods of care can be accomplished.

A concern raised at the January roundtable meeting was that alternative labeling would significantly increase the use of perchloroethylene. First, testing is not required to establish a reasonable basis. But, if it were required, most manufacturers use a commercial drycleaning machine to assess a garment's drycleanability. Today's drycleaning machines recover 99.5% of the solvent used during processing. This is attested to by the fact that perchloroethylene consumption has dropped 70% over the past 10 years. Any impact care labeling may have on perc consumption must be classed as trivial.

It appears that the FTC has accepted, as part of its mission, EPA's goals in environmental protection. While the fabricare industry has proven its support for environmental health, we respectfully suggest that FTC not permit EPA's mission to compromise FTC's primary requirement to aid consumers in making informed choices in textile product selection and care. More important however, is that FTC's first and foremost responsibility is to fulfill its mission to the consumer. FTC's role is not to encourage or discourage the use of any particular care method, except as it relates to the ability to maintain the garment or household item in question. Furthermore, if alternative care labeling would encourage additional consumer use of professional care, that does not necessarily correlate with increased use of perchloroethylene.

Alternative labeling allows for the inclusion of new care methods, such as wetcleaning. There are a great many advances in cleaning technology emerging. Some of these may provide enhanced cleaning results. Some may pose specific risks. If it is to fulfill its promise to the consumer, the FTC system must be able to reflect these benefits and disadvantages of new care methods as they make their way into the market. The FTC would not want to offer a care label approaching obsolescence before it takes effect.

Should the Commission amend the Rule to permit, or to require, a "Professionally Wetclean" instruction?

The fabricare industry is in favor of providing a wetcleaning care instruction in conjunction with instructions for other established care procedures not as a single care label at this point. Wetcleaning is an emerging technology and the practice has yet to be standardized. Wetcleaning, as practiced in the industry, to date, encompasses everything from hand washing to computerized equipment to specialized finishing equipment and several methods in between. For wetcleaning to be included as a care method the FTC will have to provide a definition. The definition should not be specific to equipment type nor should it be limiting to what is commonly practiced the industry

to date. As well it must indicate to the consumer that this is a professional care method, not one that can be accomplished at home with satisfactory results.

Textile and garment manufacturers have no means to assess "reasonable basis" for wetcleaning. There are no established test methods and there is no broad-based industry knowledge. Using as a model one commercial plant which practices wetcleaning cannot be the basis to ensure that every plant will use the same method.

IFI would like to thank the FTC for the opportunity to comment on the proposed revisions to the Care Labeling Rule since the Rule has such a significant impact on the fabricare industry. We encourage the FTC to extend the comment period to not only continue the dialogue established at the January Roundtable but to allow for data collection on true consumer preferences and the true cost of alternative labeling.



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