

March 1, 1999

Donald Clark
Secretary
Federal Trade Commission
Sixth and Pennsylvania Ave NW
Washington, DC 20580

Dear Mr. Clark:

I am writing on behalf of the Environmental Finance Center, Region IX to let you know that we welcome the proposed amendment to the "Trade Regulation Rule on Care Labeling of Textile Wearing Apparel and Certain Piece Goods." [16 CFR Part 423]

Environmental Finance Center, Region IX (EFC9) is a non-profit organization affiliated with California State University, Hayward and supported by the US Environmental Protection Agency. Our mission is to promote, support and sustain the environmental goods and services industry through a variety of programs and services including, but not limited to:

- * small business outreach
- * environmental business directories
- * environmental industry charrettes
- * environmental export assistance
- * pollution prevention assistance
- * technology transfer assistance, and
- * environmental business information clearinghouse services.

At present, our work is focused on pollution prevention in the dry cleaning and metal finishing industries. In the dry cleaning arena, we held two charrettes (a problem-solving focus group) with dry cleaning owners in Oakland and Berkeley to identify barriers to adopting safer fabricare technologies and recommendations for overcoming those barriers.

Based on the results of our charrettes, EFC9 supports the proposal to make a "Professionally Wetclean" label available.

According to charrette attendees, the public is largely unaware of fabricare alternatives. Dry cleaning customers do not understand the dry and wet cleaning processes or how to appropriately clean their garments. For example, many customers prefer their garments to be dry cleaned, even if they can be wet cleaned more effectively. And, according to dry cleaners, it's difficult to educate consumers.

There is little if any demand for wet cleaning in the San Francisco East Bay Area, since most consumers are unaware of its availability and believe that "wet cleaning" is something that can be done at home. Providing a label would help educate consumers and support the nascent professional wet cleaning industry.

Another recommendation made at the charrette was that regulators work with the US Federal Trade Commission to improve enforcement of proper labeling of imported garments.

EFC9 supports the Center for Neighborhood Technology (CNT) specific comments on the proposed amendment, which follow.

1. The FTC should consider a "Professionally Clean" label.
2. The definition of wetcleaning in Part D.1. requires revision. EFC9 suggests using CNT's proposed definition of wetcleaning, quoted below.

"Wetcleaning is the cleaning of clothes in a commercial setting with a water-based system that utilizes specially formulated detergents, and precise control (either manual or computerized) over the mechanical action, water temperature and level, and carefully regulated drying. Wetcleaning spotting is done by using products designed for the process that can be safely discharged to sewer systems. Pressing of wetcleaned garments may be done either with conventional professional pressing equipment, or with tensioning finishing equipment and/or drying cabinets for greater productivity."

This suggested definition could be fleshed out to include specific technical parameters such as water temperature, extract speeds, detergent quantities, etc. in cooperation with the AATCC and other organizations.

3. The label should not specify equipment type, but should recommend or require the use of specially formulated wetcleaning detergents.
4. Where necessary, the label should specify the use of professional finishing equipment, in particular tensioning presses.
5. The proposal should require fiber content to be listed on the permanent label.
6. The use of only a "Professionally Wetclean" label should be allowed, but where appropriate, other cleaning methods may be specified.

EFC9 would like to thank the Federal Trade Commission for extending the comment period on the proposed amendments to the "Trade Regulation Rule on Care Labeling of Textile Wearing Apparel and Certain Piece Goods.", which allowed us to submit this comment. As we wrote, we believe that this new label will increase the market for wet cleaning and ultimately reduce dry cleaners' dependence on perchloroethylene.

Sincerely,



Susan Blachman
Associate Director
EFC9