

16 CFR Part 423 Care Labeling Rules

Statement by  
Peter Sinsheimer and Robert Gottlieb  
Pollution Prevention Education and Research Center

RS11915  
B23764500042

The Pollution Prevention Education and Research Center applauds the FTC for recognizing the need to create a 'Professional Wet Clean' care label. However, the threshold issue concerning the proposed rule – whether to allow or require all garments which otherwise cannot be home laundered and that can be professionally wet cleaned to carry a professionally wet clean label – is not adequately addressed. By establishing a rule *allowing but not requiring* a professional wet clean label, the FTC may create significant problems that are addressed below:

- *It can be misleading to customers:* When there is only a dry clean label on a garment, but the garment can also be professionally wet cleaned, that provides incomplete information to the customer, and may serve to misinform the customer on what can or cannot be professionally wetcleaned.
- *It establishes a comparative disadvantage for professional wet cleaners:* By providing that garments may carry an exclusive 'Dry Clean' label, even if the garment could also be professionally wet cleaned, an unfair comparative disadvantage is created for professional wet cleaners who exclusively use wet clean equipment to clean garments.
- *It limits the diffusion of wet cleaning:* While the number of cleaners using professional wet clean equipment has grown steadily, one of the greatest barriers to dry cleaners adding or converting to wet cleaning technology remains the high percentage of garments exclusively labeled 'Dry Clean' or 'Dry Clean Only'. The proposed rule is not likely to significantly alter that barrier.
- *It limits the reduction of PCE use:* The motivation for this rule is, in part, associated with EPA's desire to reduce PCE use. However, by enabling garments to be exclusively labeled 'Dry Clean' that could have been professionally wet cleaned, it is likely that such a garment will still be sent to a cleaner using PCE. This in turn contributes to the use of PCE in a situation where that use might otherwise have been reduced.
- *It inhibits the development of a standardized test method for wet cleaning:* Requiring a 'Professional Wet Clean' care label where appropriate would motivate garment manufacturers to develop valid and reliable wet clean testing procedures which then could be used to develop a standardized test method. This motivation would be virtually eliminated if manufacturers were not required to assess whether the garment can be wet cleaned.

Each of these problems would be overcome if the FTC required a wet clean label for all garments that can be wet cleaned and which otherwise cannot be home laundered. We urge you to consider that action.