

September 17, 2010

Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex N)  
600 Pennsylvania Avenue  
N.W., Washington, D.C. 20580

Re: 6 CFR Part 305: Final Amendments to the Appliance Labeling Rule That  
Require Changes to the Existing Labeling Requirements for Lamp Products (Light Bulbs)

Dear Commission members:

I appreciate that you are strengthening warnings on CFL packaging, but I strongly disagree with many of the conclusions of your review of labeling requirements for CFLs.

Consumers are accustomed to using incandescent light bulbs that are not a hazard to themselves or the environment. Unless there is an education campaign through labeling and awareness programs, consumers will not realize the need to go to a web site to learn how to handle CFLs safely. CFLs have been widely promoted as “good” for the environment and most consumers have no idea that they pose a significant hazard when broken in the home or discarded into landfills.

CFL packaging spreads this message further. Messages like “environmentally safe,” “earth friendly,” and “reduces demand on landfills” makes any generic warning about Mercury seem minor. In addition, some packages use a recycling symbol on the paper label – which seemingly indicates that the CFL should be recycled normally, but in actuality refers only to the thin slip of paper inside the paper package (see illustration 2).

Consumers should be warned that it is not a good idea to use a CFL bulb in a light that might be knocked over easily, especially if there are infants or small children in the home, and that a broken bulb poses a hazard to their health. Consumers also need to know that CFL bulbs should not go in their trash can or in their regular recycling bin where bulbs will likely break and contaminate the environment.

Some additional requirements on the package label could go far in raising consumer awareness:

1. Manufacturers should not be allowed to use a recycling symbol on the package label regardless of whether or not the packaging has some paper content.
2. A prominent warning should be added to all package label cautioning to handle with care – the bulb contains Mercury and poses a health hazard if broken.

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3. Do not allow manufacturers to use packages with die-cut tabs that cover the mercury information printed on the base of the bulb – a common practice (see illustration 2).
4. Discourage manufacturers from using misleading statements like “environmentally friendly” that gloss over the potential hazards of mercury contamination.
5. A clear warning should be added to all package labels instructing consumers to not dispose of this product as normal refuse – the bulb should be recycled as hazardous waste to prevent mercury contamination.

Illustration 1



The die-cut tab printed with “environmentally safe, reduced toxic and hazardous materials” covers over the mercury warning printed on the lamp base.

Package description states: “Reduces demand on landfills” with no information about the need to dispose of bulbs as hazardous waste.

Illustration 2:



Note:

The mercury warning is minimized by the stronger "Earth Friendly" messages.

No warnings for consumers to handle with care, or that a broken bulb creates a hazard, especially for children and pregnant women.

The recycling symbol refers to the packaging label paper, but its placement can easily confuse the consumer who may think the bulb itself may safely go into the recycling bin.

Please remove confusing recycling symbols and die-cut tabs from CFL packaging and require instructional warnings be added to the label in order to alert the consumer of the need to handle and dispose of CFLs safely. Consumers will not look to a web site for information that they do not realize they need.

Sincerely,  
Jeanne Fountain