

## FTC Care Labelling Rule 16 CFR Part 423 Project No R511915

These comments are presented by Chris Tebbs, currently based in Canada, on behalf of:

International Drycleaners Congress, a professional organisation for drycleaners worldwide.

CINET, a trade association for International Textile-Care businesses and National Trade Associations.

The author also represents CINET and NORMAPME, a European organisation for the support of Crafts, Trades and Small and Medium-sized Enterprises for Standardisation on ISO/TC38 – Textiles and its two SCs, particularly SC2 – Cleansing and Finishing.

In this latter capacity, he has been heavily involved for many years in the development of:

ISO 3758 – Textiles; Care labelling code using symbols

ISO 3175 – Drycleaning and Finishing Part 1 Method for assessing the cleanability of textiles and garments

Drycleaning and Finishing Part 2 Procedures for Tetrachloroethylene

Drycleaning and Finishing Part 3 Procedures for Hydrocarbon Solvents

Drycleaning and Finishing Part 4 Procedures for Simulating Wet Cleaning Systems

ISO 6330 – Textile – Domestic washing and drying procedures for textile testing

Having previously had the opportunity to submit comments, we are very pleased, in general, to see that the Commission has confirmed the need for and retention of the Rule. The Rule provides valuable guidance to consumers and their agents i.e. drycleaners and launderers. The fact that it is mandatory, unlike in other continents such as Europe, ensures that it is widely used and that all participants are on a level playing field.

With regard to the proposed amendments, we support wholeheartedly the proposal to allow manufacturers and importers to provide care instruction for professional wetcleaning on labels, if the garment can be professionally wetcleaned. This is a significant tool in the processes available to drycleaners and launderers whether as a stand alone process or as a supplementary service. However, it will require positive marketing to ensure that it is not confused with washing processes

We also support the proposal to allow manufacturers and importers to use the symbol system set forth in either ASTM Standard D5489 – 07 or ISO 3758. **However, to ensure that there is consistency in worldwide use, we would recommend that you reference ISO 3758: 2012 and not as currently shown, ISO 3758: 2005.**

We acknowledge that there are some differences between the two Standards and, in some cases, these may be confusing. As ISO3758 is referenced in most countries, with the exceptions of USA, South Korea and Japan, and, as Japan is currently working to harmonise their National Standard with ISO 3758:2012, we would hope that the FTC would encourage ASTM to consider harmonisation, at the very least where there are conflicting symbols. In the event that such harmonisation results in a revised ASTM D5489, we would hope that the FTC would consider a request for an update of the Rule to incorporate this.

With more and more global travel, the drycleaning industry is seeing more of a mixture of ASTM and ISO Symbols, something which is particularly evident in my home country of Canada. Ultimately, it would be better for all consumers, drycleaners, launderers and, particularly, international manufacturers if there were to be just one system and hopefully this proposed amendment will go some way to encouraging this.

As with wetcleaning, there will need to be proactive marketing to ensure that textile and garment manufacturers, professional textile carers and consumers are aware of the two systems and particularly where there are differences.

The third proposal to seek clarification of reasonable basis requirements for the care instructions is welcomed although we would strongly suggest that garment manufacturers should, wherever possible, use appropriate Standard test methods. Most importantly, any testing should be on the complete garment as intended to be sold, with the exception of trimmings or adornments which can easily be removed, and the care labelling should be so as to ensure that the recommended process will not cause any damage to any component whatsoever. It should be noted that testing in an uncontrolled environment such as putting it through a local drycleaning process does not provide the confidence of controlled testing to Standards.

We believe that all reputable manufacturers will normally apply a test procedure but our concern is with those who may wish to deviate from good practice and from whom it may prove difficult for the consumer to gain recompense in the event of failure when using the recommended process. We do not believe that batch testing of garments will add any significant cost to each article produced and sold but it will lead to a reduction in problems within the textile-care process and ultimately, greater consumer satisfaction. We would hope that the Commission will keep this matter under review.

The fourth proposed amendment to broaden the definition of drycleaning to include any solvent, including some of the relatively new solvents/processes used in the industry is desirable but we feel that it may lead to problems due to the lack of test methods for any other than perchloroethylene and hydrocarbons.

Although the new solvents and processes that have been introduced in recent years still represent only a relatively small proportion of the drycleaning industry world-wide, they are slowly increasing their market share each year and the situation needs to be addressed sooner rather than later. Until there are appropriate test-methods for these, there will be difficulty in applying meaningful care labels that incorporate these processes.

This fact has already been noted in the appropriate working group of ISO/TC38 and needs to be considered within ASTM. This is a world-wide problem and needs to be addressed globally through partnership of the textile and garment manufacturing industry, solvent and chemical suppliers and machine manufacturers with a world-wide co-ordinated effort such as was achieved when developing test methods for cleansing in hydrocarbons and in wetcleaning processes

Finally, we have noted the comments about the necessity for the inclusion of fibre content on care labels. Recent information confirms that the majority of countries require fibre content labels to be applied to garments in a form that can be referred to by the consumer. Drycleaners find such information particularly useful especially when it covers such areas as interlinings and facings as well as mixed fibre garments. Whilst we do not necessarily require this information to be on the care label, we would like to see it in an appropriately 'visible' part of the garment. The more information available to the professional textile-carer, the more likely there will be a satisfactory result in the cleaning and finishing process.

Whilst there are still some areas that need to be addressed, we find the proposals from the Commission to be very positive and a big step in the right direction. We appreciate the efforts to develop an appropriate care labelling rule for the modern industry that will enable the textile and garment manufacturing and importing industries to work with the professional textile care industry to ultimately ensure consumer satisfaction.