



Gütersloh Zentralbereich

Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580

16.11.2012

Comments on Care Labeling Rule

To whom it may concern:

The possibility of reviewing the current status of care label rules in the United States of America through the Federal Trade Commission is greatly appreciated.

The situation as of today is that for the cleaning industry, whether it is a dry cleaner or a laundry facility, care labels guide operators towards the possible and suitable cleaning method.

But if the care labels are getting released as an option, we might face the fact, that the garment industry will still not adopt the specific labels for wetcleaning.

The situation in Europe is as follows:

The cleaners are still missing the care labels for wetcleaning even ISO released those since quite some while. To show the evidence of this situation I was visiting a couple of garment stores in Belgium and Germany.

I found the wetcleaning carelabel only with one manufacturer.

All other stores of all kind of different brands had not a single garment showing the label for wetcleaning. I visited 10 different brands in Belgium and Germany.

Most important, also the staff of those stores didn't even know about the meaning of the wetcleaning care label. This is showing to me evidence that the wetcleaning care label is not used by the garment manufacturers. Because of that, we see the need for a mandatory care label instruction. Otherwise we'll face the similar situation as it is in Europe.

To show even further evidence I've contacted my colleagues in Portugal and Italy where we have wetcleaning stores. Following statements I've received:

Miele Professional Italy has installed more than 300 wet cleaning systems. The cleaners are still not seeing the wet cleaning specific care label "W" in the circle. This is still causing the issue that the cleaners have no security if they are choosing the wet cleaning process, because no care label for this process is getting used. Our experience is, that the missing care label for the



wet cleaning process is causing a challenge for the cleaner. Even the care label criteria's for the wet cleaning process are defined, the garment manufacturers are not using it.

Claudio Branz
Professional Manager
Miele Italy

Miele Portugal has more than 15 dedicated wetcleaning customers within one group called Aquacare, plus an additional group of customers using the wetcleaning process as an additional cleaning method. Based on the experience of all those cleaners we can state that the wetcleaning care label -"W" in a circle- is not common. Based on an estimation of the cleaners, we can say that the amount of labeled garments with the "W" in the circle is below 1%. Even garments are labeled with handwash or delicate wash we are not seeing the wetcleaning care label at all – which could indicate an alternative cleaning method.

Paulo Silva
Professional Manager
Miele Portugal

Having all this experience in Europe we would really appreciate a public hearing for further discussion. This would give us also the chance to prepare for such an important topic. After we submitted last year a comment for the care labeling issue we would have expected to be contacted for further discussions. With that in mind we would have had the chance to prepare in a much better way for providing further evidence of our experience in Europe.

If the FTC will not really move forward with this specific topic we predict that we will see no improvement for such an alternative cleaning process which will help in terms of optimized energy efficiency and environmental aspects. That would be a huge drawback for all the cleaners using such an alternative cleaning method.

Kind regards
Miele & Cie. KG
Professional International

Jürgen Schäfer

Head of Product Management
Laundry Care