

Care Labeling Rule, 16 CFR part 423, Project No. R511915
SGS response to request for comments on Care Label Rule

1. To what extent do manufacturers and importers use care symbols to provide care instructions for garments and piece goods sold in the United States? To what extent do they use symbols alone? To what extent do they use symbols in conjunction with written instructions? To what extent do they use ASTM symbols without using ISO symbols, ISO symbols without using ASTM symbols, or both ASTM and ISO symbols? What evidence supports your answer?

The majority of the garments we see during the testing process contain words and sometimes symbols in addition to words if they are only going to be sold in the USA. If the garments will be sold in countries other than the USA, then the majority of garments use symbols with some also having words. It is difficult now because the symbols required by the FTC and the symbols used in Europe are not the same. This sometimes results in two sets of symbols that might be confusing to consumers. With countries that require the use of the Ginetex symbols, five symbols are always required where in the USA only one method of care is required on the label. Words are only used in the EU for additional instructions for which there are no symbols. Many times you could see the words and the ISO symbols that correspond to the words for the US care system but the use of the ISO symbols would not satisfy the EU rules where care labels are mandatory. Understanding of the symbols is better outside of the USA.

The philosophy of the care labeling in Europe is to put on the “harshest” set of instructions even though that might not be the way the garment is actually cared for. The instructions would indicate that anything less harsh than the instructions as well as the instructions could be used. However, it is not common for any testing to be done to be sure the garments can actually be cared for using the instructions and that no harm would come to them. The testing that is outlined in the ISO method is there as guidance for manufacturers to use when they have to determine the care label for new items, but are not used to actually verify the care instructions on the garments.

This information comes from years of working with global companies, US companies and EU companies in developing testing programs and determining compliance to regulations.

2. Do the proposed amendments to the Rule’s reasonable basis provisions clarify them adequately? Is any additional clarification needed? If so, what? If not, why not? What evidence supports your answers?

There is clarification needed with examples especially around the issue of what needs to be tested or what needs to be used to verify instructions such as “Use only non-

chlorine bleach”, dryclean only”, “do not machine wash” etc. It is not well understood that if a method is being warned against that there needs to be a reasonable basis for making the warning. It also needs to be clearer on how often the reasonable basis can be used. Just because there is a reasonable basis that one lot of fabric can be labeled with a particular care instruction one season, it is not always true that it will be the same when it is produced again, especially in different factories with different dyes and chemicals.

There are many companies who do not understand the “reasonable basis” and for instance test only for non-chlorine bleach when using the instructions “use non-chlorine bleach only” or do not test for bleaches when using the instruction “do not bleach”. This has come from years of consulting on program development and using testing programs from retailers, manufacturers and vendors.

3. Amending the Rule to update the provision allowing the use of certain care symbols in lieu of written terms by permitting manufacturers and importers to use the symbol system set forth in either ASTM Standard D5489–07, “Standard Guide for Care Symbols for Care Instructions on Textile Products,” or ISO 3758:2005(E), “Textiles—Care labeling code using symbols”;

The use of the ASTM Standard D5489 – 07 care symbols would be an improvement over the 96c version that is currently in the Care Label Rule. However, there will be great confusion and cause more issues for retailers, manufacturers and vendors who do business globally if the ISO 3758:2005(E) is cited in the Care Label Rule. This is not the most current ISO document and the symbols have been changed in the most current ISO 3785:2012 version of the standard. The latest version of the ISO standard has an entirely new set of natural drying symbols that are not in line with the current ASTM symbols. Although citing of the 2005 version of the ISO standard would have most of the symbols aligned (except for Do not bleach), these symbols would not be acceptable in Europe, especially in the countries that mandate use of the Ginetex symbols. This would therefore not help matters or save time and money for retailers, manufacturers or vendors. This would perpetuate the use of two different sets of symbols for items sold in both locations.

If the most current version of the ISO 3758:2012 is cited in the FTC Care Label Rule, there will still be issues since the natural drying symbols in the ISO document are not the same as in the ASTM document. If a choice of which set to use is allowed, then the retailer, manufacturer or vendor could choose and it would not matter that there are some differences, except in consumer understanding. Consumers may not understand the natural drying symbols in the ISO document, but they might not understand the ASTM symbols either. If a choice is allowed, then the most current ISO document should be used.

There is an issue of putting the year designation on the ASTM and ISO documents in the citation, because then as changes are made the care labeling rule does not keep up. Many changes are being made due to lower temperatures being put into play by the US DOE and being encouraged in other countries due to sustainability and environmental effects. If there could be a way to indicate that the year stated in the Care Label Rule or any newer version could be used, then it would let the retailers, manufacturers and vendors keep up with what is the most current technology.

This also brings into focus that there is an ongoing issue with the temperatures that are listed in the Care Label Rule. These temperatures may not match up with the new temperatures being mandated for machine manufacturers and thus consumers when using new washing machines and dryers. This is a point that needs discussion and clarification.

4. If the ISO symbols are used, the label should disclose this fact.

How would this be indicated on the label? Most consumers are not very familiar with care symbols and would not know the difference between ASTM and ISO symbols. It seems that adding additional words to the label to disclose the symbols are ISO is of little value to the consumer.

From years of working with apparel retailers and manufacturers, it is evident to us that consumers do not understand what the care symbols mean and they don't know the difference between the ASTM and ISO symbols or even what that would mean to them. It is our suggestion that this be deleted from the requirements of the rule.

5. Below are several examples of commonly used care instructions illustrating the difference in symbols required by FTC vs. Ginetex and ISO. Since Europe requires that all symbols be present on a label and the US requires only symbols relevant to the chosen care, there is a discrepancy. If US labels indicate symbols other than what is required for minimum care, testing would have to be done to prove reasonable basis for not allowing that care.

Machine Wash warm, gentle cycle, only non-chlorine bleach when needed, tumble dry low, warm iron.	
US	
Ginetex	
ISO	

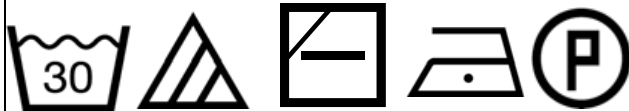
Hand wash, cold, do not bleach, Line dry.	
US	
Ginetex	
Ginetex does not recommend the use of natural drying	
ISO	

Machine wash cold, normal cycle, only non-chlorine bleach when needed, dry flat in shade.

US

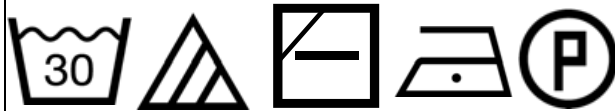


Ginetex



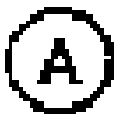
Ginetex does not recommend the use of natural drying

ISO



Dry Clean. Do not Wet Clean

US



No symbol at this time for Do Not Wet Clean

Ginetex



ISO

