

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

06. September 2011

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 possible and suitable cleaning method. As of now, a specific care label for the wetcleaning process is still lacking. This limits cleaners in offering the best cleaning process when it comes to cleaning performance (e.g. water soluble stains) or fabric-related cleaning processes (e.g. polyurethane).

For over a decade wetcleaning equipment has been available in the United States, but the challenge is that the drycleaner or the launderer lacks guidelines when it comes to using the process.

Even worse, there is nothing to indicate to consumers that garments can be wetcleaned. Although all the cleaners which use wet-cleaning as an add-on or as their sole method of cleaning method use proven technology, the drawback for cleaners is that they have no safety back-up or reference in the form of a test standard/care label if something goes wrong during the cleaning process.

From the end-users' point of view, the open question is still how wetcleaning can be brought to their attention. In view of the lack of a suitable label, consumers are unaware of its existence. I compare it to the use of the care labels for a standard wash cycle: If there were no label available for a wash cycle of 140°F most consumers wouldn't use it. The same also applies to hand wash and so on.

The International Organisation For Standardisation (ISO) implemented a test procedure in 2003 for a wetclean care label. With this standard the manufacturer of garments has a guideline as to how to test those garments. If tests are successful, the manufacturer can use the wetcleaning care label without any risk. The technical corrigendum 1 of ISO 3175-4:2003 was published on 2009-08-15.

As a manufacturer of wetcleaning equipment we see great opportunity for promoting a proven technology with all the benefits in regard to the flexibility of cleaning methods, security for business owners of wetcleaning equipment and a clear message towards the consumers who can now choose an alternative cleaning method.

Kind regards
Miele & Cie. KG
Professional International

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