

# Creating a New Care Label for *Environmentally Friendly* Professional Wetcleaning:

## Why Reliable Evidence Supports Its Required Use

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## Definitions:

# Dry Cleaning and Professional Wet Cleaning

### **Dry Cleaning**

A commercial process by which soil is removed from products or specimens in a machine which uses any solvent excluding water (e.g., petroleum, perchloroethylene, silicone, glycol ether, carbon dioxide, or aldehyde). The process also may involve adding moisture to the solvent, up to 75% relative humidity, hot tumble drying up to 160 degrees F (71 degrees C) and restoration by steam press or steam-air finishing.

### **Professional Wetcleaning**

A commercial process for cleaning products or specimens in water carried out by professionals using special technology (cleaning, rinsing, and spinning), detergents, and additives to minimize adverse effects, followed by appropriate drying and restorative finishing procedures.

# Why is professional wet cleaning *environmentally friendly*?

	Technology	Human Health & Environmental Hazard	Air Regulations	Health Regulations	Fire Regulations
	<b>Professional Wet Cleaning</b>	<ul style="list-style-type: none"> <li>▪ None Identified</li> </ul>	N/A	<ul style="list-style-type: none"> <li>▪ Choose cleaning agents to min env impact</li> </ul>	N/A
	<b>CO<sub>2</sub></b>	<ul style="list-style-type: none"> <li>▪ None Identified</li> </ul>	N/A	<ul style="list-style-type: none"> <li>▪ Fee on CO<sub>2</sub> volume</li> </ul>	<ul style="list-style-type: none"> <li>▪ Permit</li> </ul>
	<b>Petroleum</b>	<ul style="list-style-type: none"> <li>▪ Neur/eye/skin/resp irr</li> <li>▪ Pers &amp; aqu tox concern</li> <li>▪ Mixtures of contain</li> </ul>	<ul style="list-style-type: none"> <li>▪ Regulated</li> <li>▪ Emits VOCs</li> <li>▪ Registration</li> </ul>	<ul style="list-style-type: none"> <li>▪ Fee for haz waste generated</li> </ul>	<ul style="list-style-type: none"> <li>▪ Permit</li> <li>▪ Combustible (Class IIIA)</li> </ul>
	<b>GreenEarth</b>	<ul style="list-style-type: none"> <li>▪ Susp carc &amp; repro tox</li> <li>▪ Liver/immune/nerv sys</li> <li>▪ Persist in env</li> </ul>	<ul style="list-style-type: none"> <li>▪ Regulated</li> <li>▪ Registration</li> </ul>	<ul style="list-style-type: none"> <li>▪ Fee for haz waste generated</li> </ul>	<ul style="list-style-type: none"> <li>▪ Permit</li> <li>▪ Combustible (Class IIIA)</li> </ul>
	<b>PCE</b>	<ul style="list-style-type: none"> <li>▪ Carcinogen</li> <li>▪ Liver/kidney effects</li> <li>▪ Neurotoxicity</li> <li>▪ Pers in the env.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Regulated</li> <li>▪ Permit</li> <li>▪ Phase out</li> </ul>	<ul style="list-style-type: none"> <li>▪ Fee for haz waste generated</li> </ul>	N/A
	<b>nPB</b>	<ul style="list-style-type: none"> <li>▪ Repro and dev tox</li> <li>▪ Neur/eye/skin/resp irr</li> </ul>	<ul style="list-style-type: none"> <li>▪ Regulated</li> <li>▪ Permit</li> </ul>	<ul style="list-style-type: none"> <li>▪ Fee for haz waste generated</li> </ul>	<ul style="list-style-type: none"> <li>▪ Flam(Class I), NFPA rating 3</li> </ul>

# Professional Wetcleaning Process/Equipment

## Computer-Controlled Washing



- Gentle agitation simulates hand washing
- Low water level and low temperature

*(8 manufacturers)*

**Dispensing System:** Programmed to dispense precise amount of cleaning agents mixed with water



## Cleaning Agents

- Detergents
- Conditioners
- Sizing

*(9 manufacturers)*



**Tensioning Presses:** used to enhance restoration of constructed garments



## Moisture Sensor Drying



- Machine drying - precise moisture control
- Air drying – expose garments to ambient air

*(8 manufacturers)*

*(7 manufacturers)*

# Overall Findings on Commercial Viability of Professional Wet Cleaning

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## The Viability of Professional Wet Cleaning as a Pollution Prevention Alternative to Perchloroethylene Dry Cleaning

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### Initial Study: 2000-2004

- Dry cleaners switching to professional wet cleaning able to successfully wet clean over 99% of the 'Dry Clean' and 'Dry Clean Only' labeled garments.
- Operating costs and electricity use significantly lower after switching to PWC.

### Validation, Consistency, Generalizability: 2005-Present

- Across equipment models and detergents.
- Across geography – throughout California, Mass, etc., across income levels.
- Over time – 2000 to present.

### Created *Profession* of Professional Wetcleaning

- Skill set to successfully process full range of sensitive items labeled 'DC' or 'DCO'.
- Experience and expertise to accurately predict success or failure of new apparel in professional wet clean process.
- Professional Wetclean Association.

# Should the FTC *require* or *allow* the use of a new 'Professional Wetclean' label?

- FTC legal standard for requiring use of a particular care label:
  - Must show:
    - (1) The failure to list the method is prevalent.
    - (2) The failure to list the method is deceptive or unfair.
    - (3) The response of requiring a label must be appropriate and cost effective to address unfair or deceptive practice.

# 1<sup>st</sup> Criterion for requiring a label: Is the failure to list a method prevalent?

- 99+% apparel labeled 'DC' or 'DCO' successfully professionally wetcleaned.
- In US, not legal to label of garment 'Professional Wetclean'.
- What if 'Professional Wetclean' label is allowed but not required?
- ISO developed PWC label in 2007. Allowed to be used throughout Europe.

	<b>Professional wet-cleaning.</b> Normal wet cleaning methods with no restrictions.
	<b>Mild professional wet-cleaning.</b> Wet cleaning technique for sensitive textiles with reduced mechanical action.
	<b>Very mild professional wet-cleaning.</b> Wet cleaning techniques for very sensitive textiles with much reduced mechanical action.

- Perfect natural experiment: Search countries where ISO 'Professional Wetclean' label allowed for prevalence of label six years after label allowed.

# On-line search of apparel company web sites where ISO 'Professional Wetclean' label is permitted

<b>Great Britain</b>					
<b>Brand</b>	<b>Professional Clean Label</b>			<b>Distribution</b>	
	<b>Dry Clean</b>	<b>Clean</b>	<b>Total</b>	<b>DC %</b>	<b>WC %</b>
1. Thomas Pink	23	0	23	100.00	0.00
2. Givenchy	16	0	16	100.00	0.00
3. Donna Karan	74	0	74	100.00	0.00
4. Balenciaga	37	0	37	100.00	0.00
5. Stella Mc Cartney	147	0	147	100.00	0.00
6. Hugo Boss	1,093	11	1,104	99.00	1.00
7. Forever 21	84	0	84	100.00	0.00
8. H&M	35	0	35	100.00	0.00
9. Tommy Hilfiger	181	0	181	100.00	0.00
10. J. Crew	135	0	135	100.00	0.00
<b>Total</b>	<b>1,825</b>	<b>11</b>	<b>1,836</b>	<b>99.40</b>	<b>0.60</b>

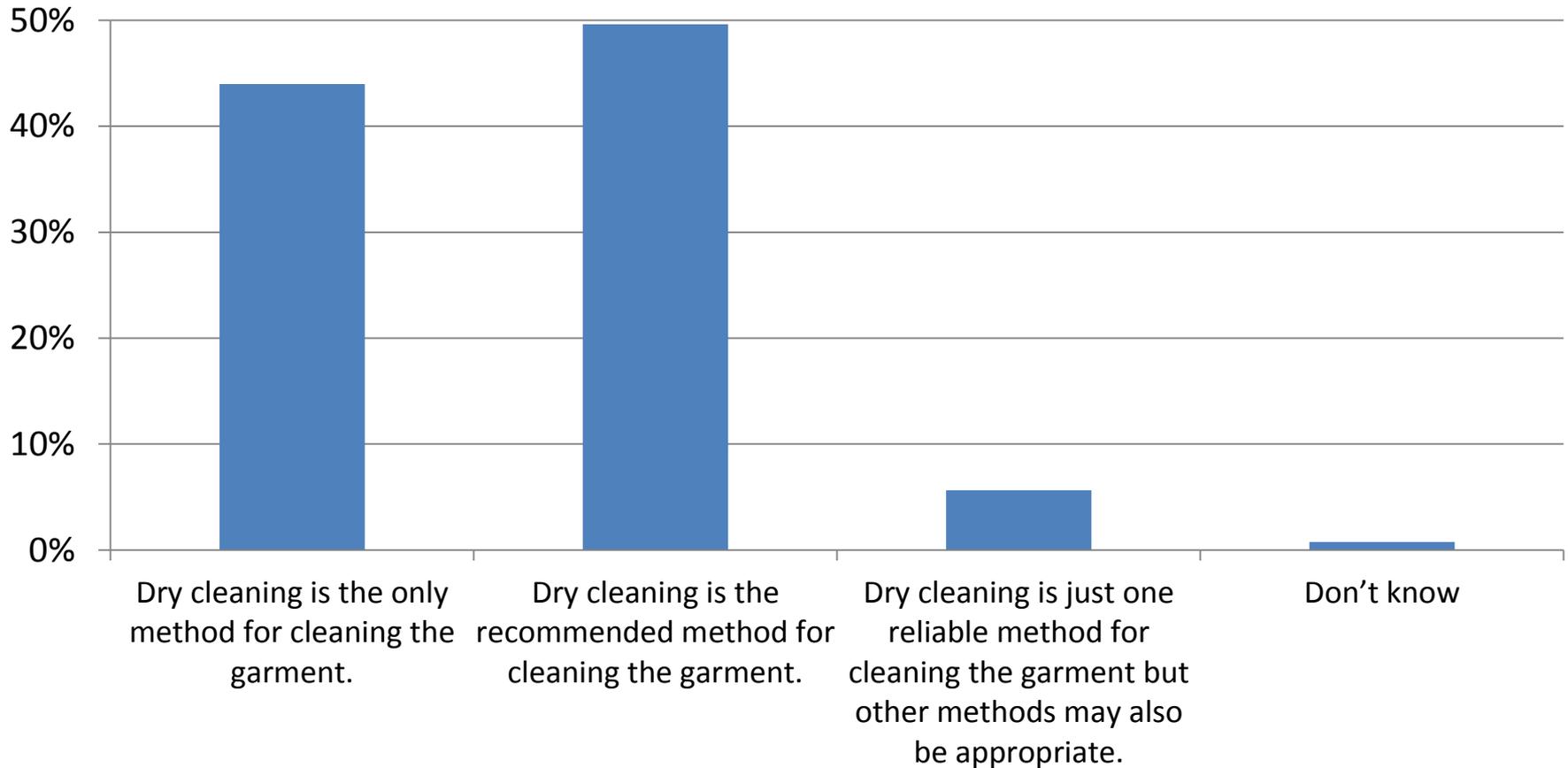
## 2<sup>nd</sup> Criterion for requiring a label: Is failure to list a method deceptive and/or unfair?

- **Criteria FTC uses to determine practice is deceptive**
  - Likely to mislead,
  - to a reasonable consumer,
  - that is material.
- **Criteria FTC uses to determine practice is unfair**
  - Substantial injury to consumers,
  - not outweighed by countervailing benefits to the consumer or to competition,
  - which consumers themselves could not have reasonably avoided.

# *Harris Interactive* Consumer Survey of Professional Care Label Options

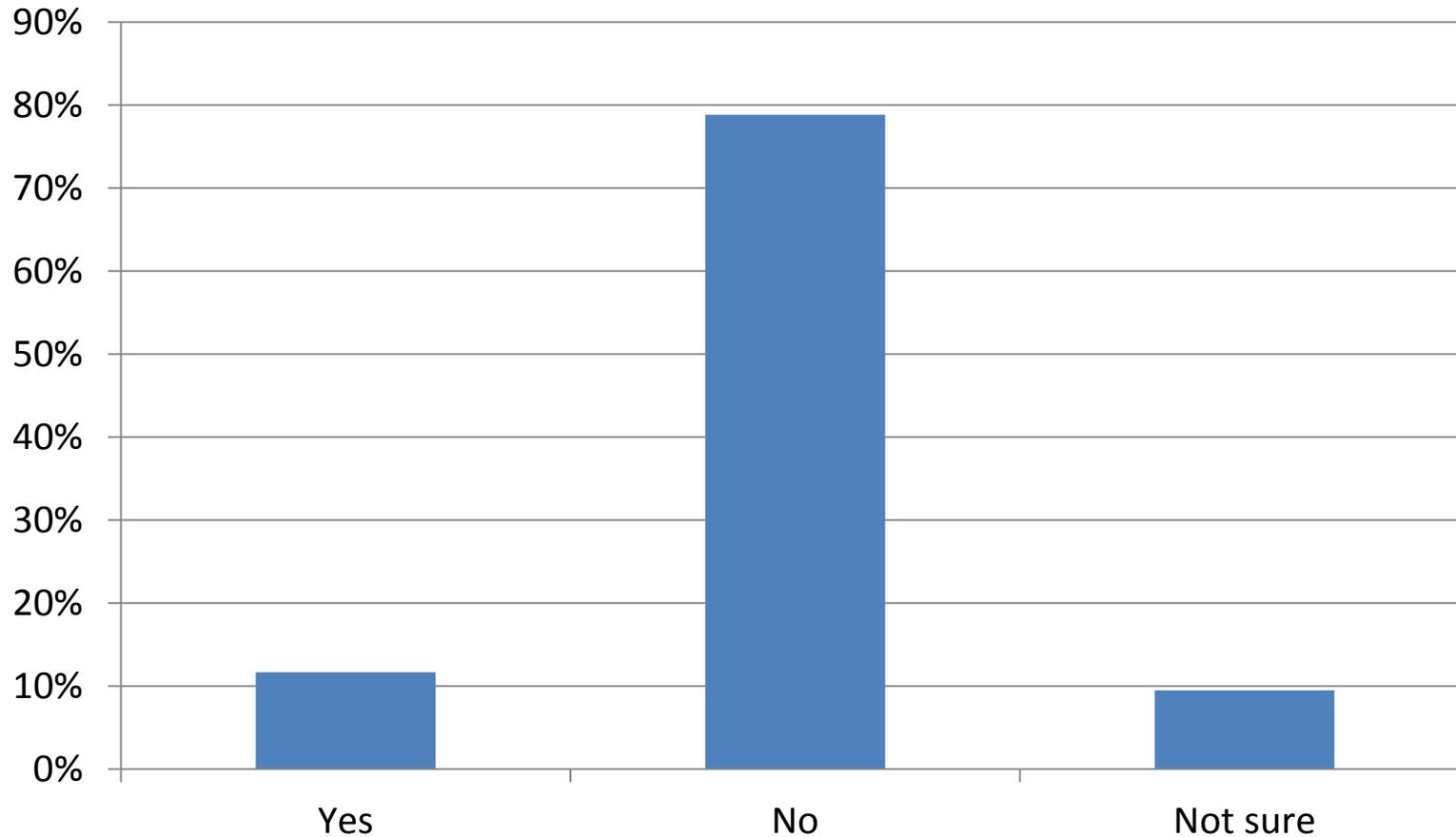
- Harris Interactive commissioned to conduct online survey within the United States between September 18-20, 2013 among 2,000 adults (aged 18 and over).
- Survey questions developed by the UCLA Sustainable Technology & Policy Program and Harris.
- Harris adjusted questions and potential responses to increase clarity and reduce unintended bias.
- Respondents for survey selected from among those who have agreed to participate in Harris Interactive surveys.
- Figures for age, sex, race/ethnicity, education, region and household income were weighted where necessary to bring them into line with their actual proportions in the population.

**Q: When you see a garment with a care label that says 'Dry Clean' what do you think it means?** (n=1,191 users of prof. cleaning service)



### Q: Have you ever heard of “professional wet cleaning”?

(n=1,191 users of prof. cleaning service)



## Information on Professional Wetcleaning

For the next few questions please read and consider the following information.

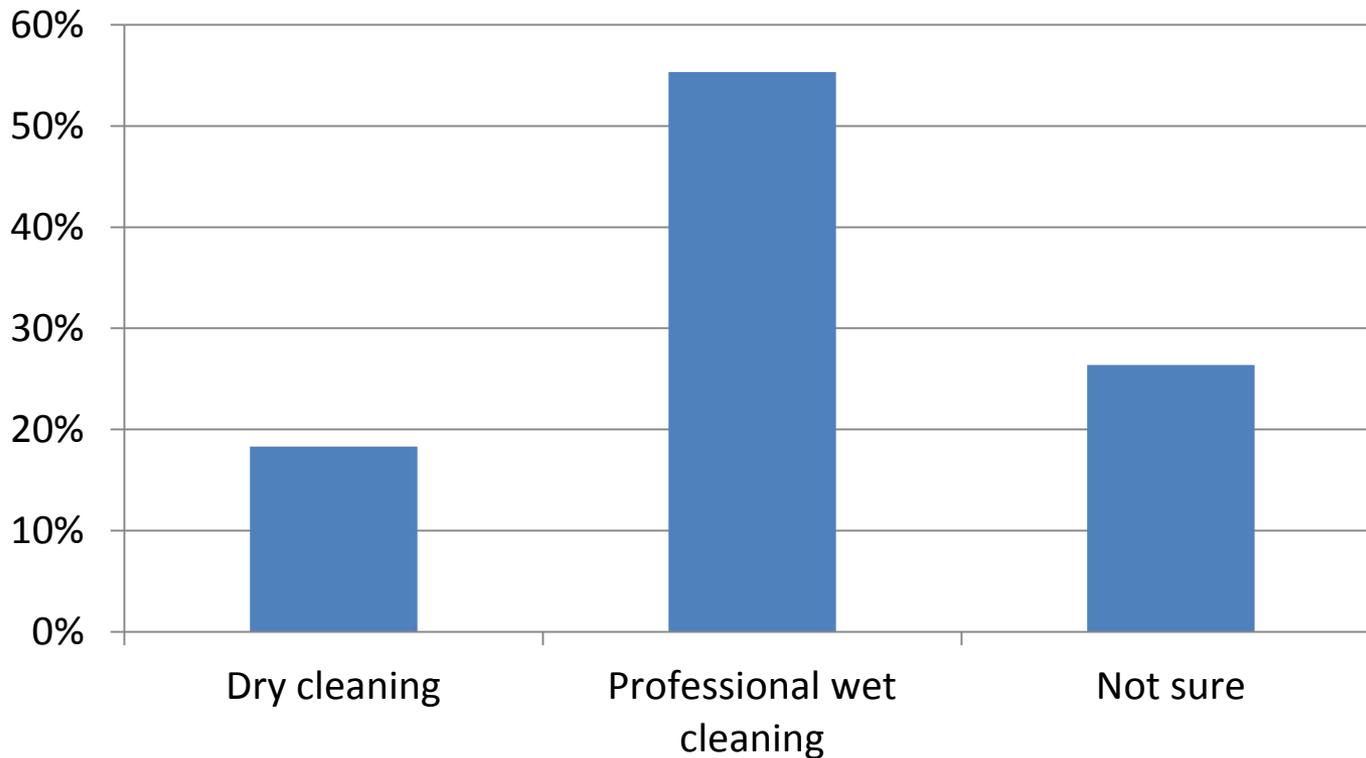
“Professional wet cleaning” is an alternative to dry cleaning and involves professional cleaners using water and special technology to clean garments typically labeled ‘Dry Clean’ or ‘Dry Clean Only.’

The United States Environmental Protection Agency (EPA) has encouraged dry cleaners to add or switch to professional wet cleaning because the process is non-toxic, eliminating the use of dry clean chemicals used at most cleaners that the agency considers to be harmful to human health and the environment.

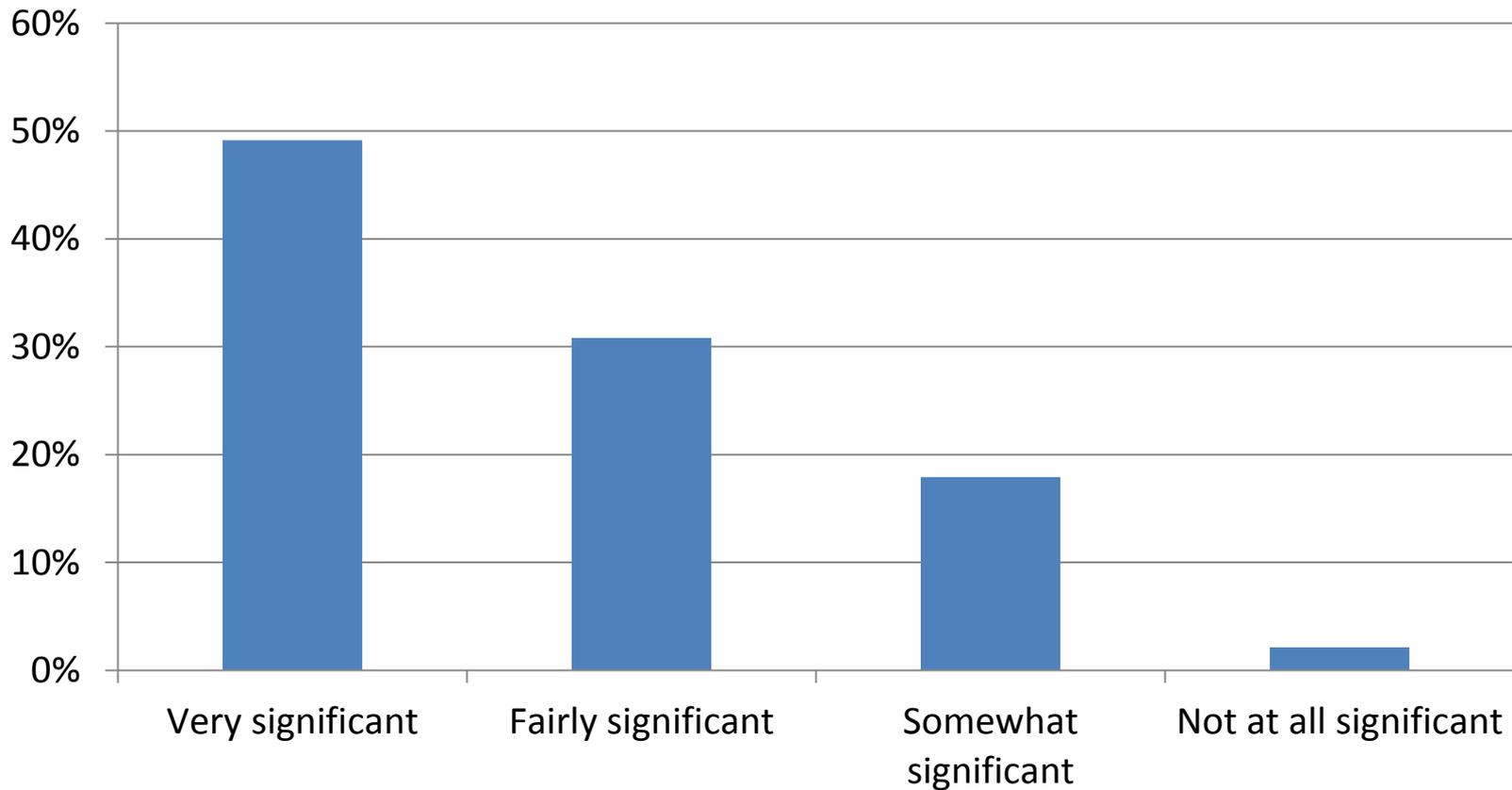
University research has shown that cleaners making the switch are able to successfully wet clean the full range of ‘Dry Clean’ and ‘Dry Clean Only’ garments they previously dry cleaned and do so at a comparable cost.

The Federal Trade Commission (FTC), which considers professional wet cleaning an environmentally friendly alternative to dry cleaning, has proposed adding a new ‘Professional Wet Clean’ care label.

**Q: Imagine you owned a garment labeled “Dry Clean or Professional Wet Clean” and the quality and cost of the two cleaning methods were the same. Which of these two professional cleaning methods would you prefer using for this garment? (n=1,191 users of prof. cleaning service)**

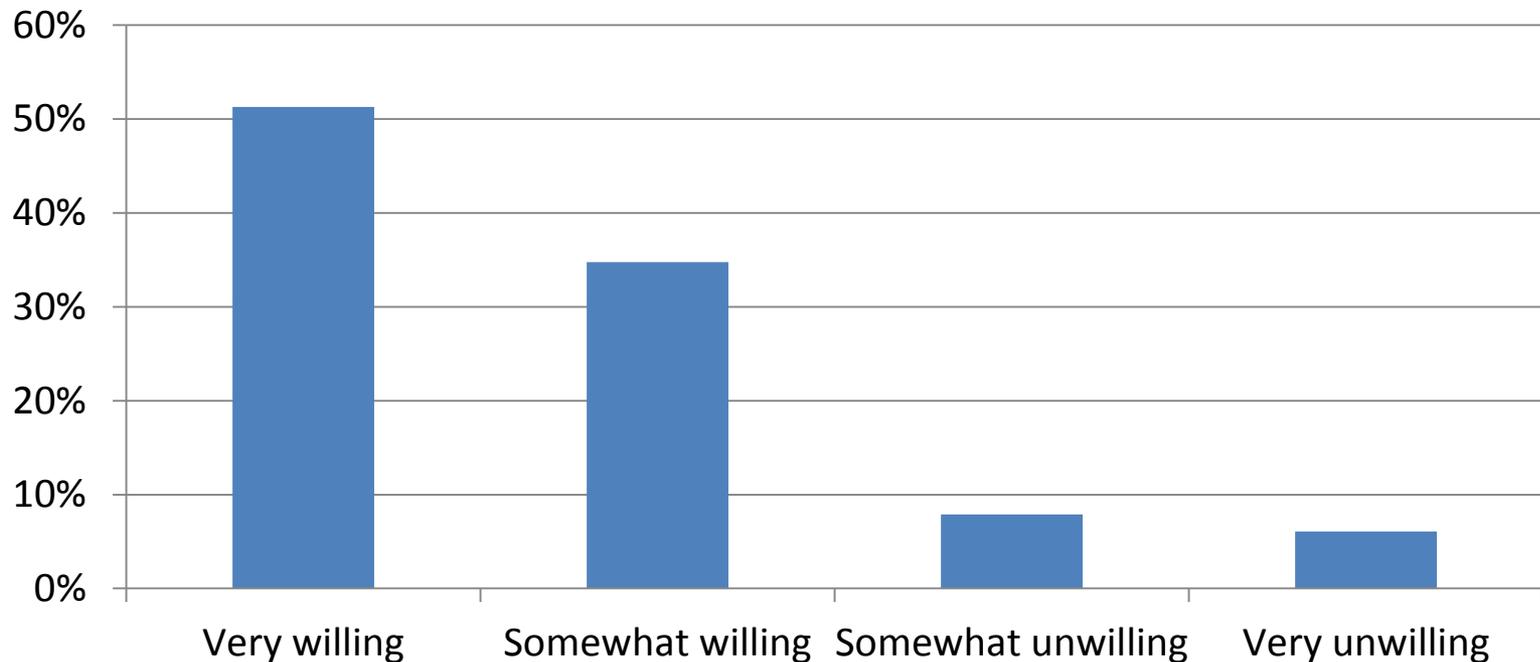


**Q: How significant, if at all, is avoiding the environmental and human health impacts of dry cleaning in your preference for professional wet cleaning?** (n=659 users of prof. cleaning service who preferred professional wet cleaning)



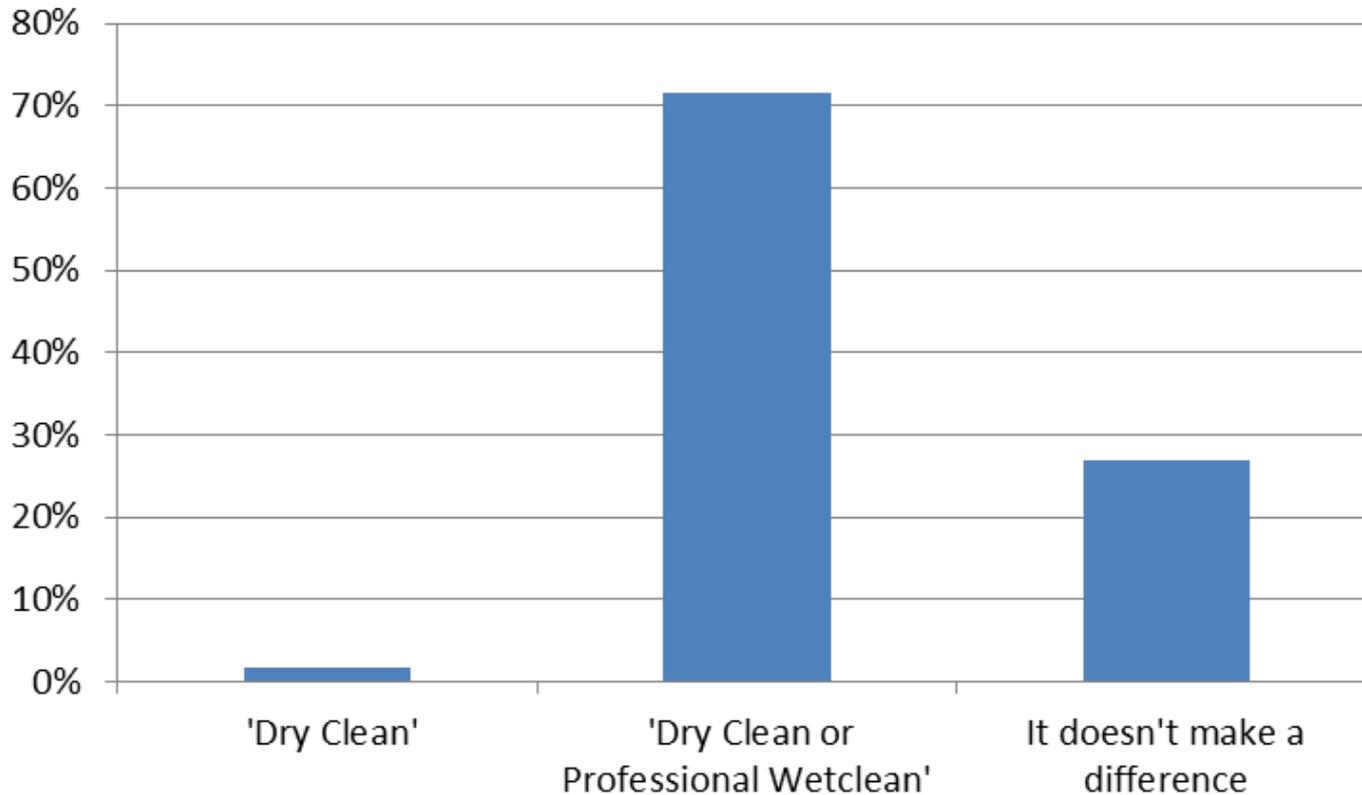
**Q: If the cleaner(s) you typically use were not able to professionally wet clean a garment you owned that was labeled ‘Dry Clean or Professional Wet Clean’, how willing, if at all, would you be to use a different cleaner which was able to professionally wet clean this garment (instead of dry cleaning it) if the price, quality, and location of this cleaner were comparable to the cleaner(s) you typically use?**

(n=659 users of prof. cleaning service who preferred professional wet cleaning)



Q: **Which of the following garment care labels would make you more likely to want to professionally wet clean a garment?**

(n=659 users of prof. cleaning service who preferred professional wet cleaning)



# Evidence that failure to list 'Professional Wet Clean' on label is deceptive

## **Likely to mislead,**

- 'Dry Clean' label extremely misleading and biased to dry cleaning.

## **to a reasonable consumer,**

- Survey of US population using professional cleaning services.

## **that is material.**

- Strong consumer preference for professional wet cleaning (55%) to dry cleaning (18%).
- Preference based on *value* of avoiding harm to the environmental human health.
- Preference strong enough that vast major willing to switch cleaners.
- Consumers with preference for professional wetcleaning less likely to act on their preference if words 'Professional Wetclean' omitted from the care label.

# Evidence that failure to list 'Professional Wet Clean' on label is unfair

## **Substantial injury to consumers,**

- Avoids harm to human health and the environment significant to virtually all consumers with preference for professional wet cleaning.

## **not outweighed by countervailing benefits to the consumer or to competition,**

- No trade-off benefits identified in using dry cleaning.
- No increased competition by not requiring 'Professional Wetclean' label.

## **which consumers themselves could not have reasonably avoided.**

- Consumer have little knowledge of 'Professional Wetcleaning' so likely to get essential information for care label.
- Consumers with preference less likely to use professional wetcleaning if words 'Professional Wetclean' not on care label.

3<sup>rd</sup> Criterion for requiring a label: Is the response of requiring a label (a) appropriate and (b) cost-effective to address unfair or deceptive practice?

**3 (a) Is requiring a 'Professional Wetclean' label appropriate?**

<b>Assessing Appropriateness of Requiring Label</b>	
<i>Specific Criteria for Requiring Label</i>	
(1) Does it resolve failure to label?	Yes
(2) Does it resolve deceptive or unfair practice?	Yes

### 3 (b) Is the required use of a ‘Professional Wetclean’ care label cost-effective?

#### Costs

- Highest quality data to determine ‘Professional Wetclean’ label – experience, expertise, testing by trained professional wet cleaners.
- Expert judgment by professional wet cleaners (using experience and expertise) can be used for 99% of garments.
- Cost of expert judgment by professional wet cleaners extremely low: \$50/item.
  - This cost likely comparable to current cost of expert judgment.
- Cost of testing at professional wet cleaners very low: \$100/item.
  - This cost likely comparable to current cost of internal testing.
- Quick transfer of knowledge to apparel industry to allow cost to be internalized and assure current cost comparability.
- Cost saving likely: professional wet cleaning less expensive than dry cleaning, reduced enforcement cost, reduced pollution remediation cost.

## 3 (b) Is the required use of a 'Professional Wetclean' care label cost-effective?

### Effectiveness

- Requiring 'Professional Wetclean' label *eliminates* deceptive practice of labeling garment 'Dry Clean' which could also be professionally wetcleaned.
- Requiring 'Professional Wetclean' label *eliminates* unfair practice of labeling garment 'Dry Clean' which could also be professionally wetcleaned.

### Cost-Effectiveness

- Requiring 'Professional Wetclean' label is extremely cost effective.

# Summary of Evidence in 'Professional Wetclean' Case for Criteria Used by FTC to Require Use of a Care Label

<b>Decision-Making Criteria for Requiring Label</b>	<b>Evidence</b>	<b>Strength of Evidence</b>
<i>Specific Criteria</i>		
(1) Likelihood that failure to use label will be prevalent	Very high	High
(2) Likelihood that failure to list method will be deceptive or unfair	Very high	High
(3a) Requiring label is appropriate	Yes	High
(3b) Requiring label cost-effective	Yes	High
<i>Overall Decision</i>		
Extent evaluation of criteria supports required use of a label	Very high	High

# Key Questions

- *Before conducting this research:* Should the FTC allow or required the use of a 'Professional Wetclean' care label?
- *After conducting this research:* What factors should the FTC consider in making an efficient and effective transition to a rule requiring the use of the 'Professional Wetclean' care label?