



HEADQUARTER
37, rue de Neuilly,
FR-92582 Clichy-Cedex
Phone +33 1 475 631 80
Fax + 33 1 473 02709
ginetex@ginetex.net
www.ginetex.net

Clichy, November 12th, 2012

FTC Proposes Changes to its Care Labeling Rule for Clothing

Dear Sirs,

As an international association, GINETEX - International Association for Textile Care labelling – would like to express a public comment on Care Labelling Rule for Clothing:

1 - Allow manufacturers and importers, if they so choose, to include professional instructions for wetcleaning – an environmentally friendly alternative to drycleaning – on labels if the garment can be professionally wetcleaned

As far as professional cleaning is concerned, information should be given for drycleaning and for professional wetcleaning. The most important is to notify the forbidden “professional wet cleaning treatment”. Indeed, dry cleaners may tend to professionally wetclean, in lieu of drycleaning a textile article, with the risk of damaging the article, if no information is given by the manufacturer on the treatment. The drycleaner is held responsible if he does wetclean when the article can not support such a care treatment.

2 - Permit manufacturers to use updated ASTM (American Society for Testing and Materials) or ISO (International Organization for Standardization) symbols on labels in lieu of written terms providing care instructions

If manufacturers or importers are permitted to use ISO symbols on labels in lieu of written terms providing care instructions, then manufacturers and importers would have to follow the ISO 3758:2012 standard and not ISO 3758:2005. This ISO 3758:2012 has been accepted by a very large number of countries, and this updated and latest version takes into account all new care symbols and techniques. It is a global standard, which is also to be used soon by Japan in its national regulation.

The proposal is important for foreign manufacturers as well, because barriers of trade will be reduced, and no specific labelling would be needed for exporting to the US.

However, the philosophy of ISO 3758:2012 is that the care labelling mentioned indicates the maximum treatments that can be applied on a textile article (in the order of washing, bleaching, drying, ironing, and professional cleaning). Therefore, the manufacturer will not fail to have a reasonable basis for care instructions. It is then up to the consumer to decide if she or he needs to wash at the maximum temperature for example, or select a lower temperature. The consumer and the drycleaner will not have misleading information for the care treatment.

In case of use of ASTM or ISO 3758:2012 symbols on a label, a wide national consumer campaign should be promoted, in order to raise awareness of the end user for the system: ASTM and ISO 3758:2012 symbols look similar, but do not always have the same meaning.

3 - Clarify what constitutes a reasonable basis for care instructions

GINETEX considers that the reasonable basis for care instruction is information on all treatments that can be applied on the textile article: washing, bleaching, drying, ironing, and professional cleaning. Solvents are to be named, and forbidden treatments have to be mentioned.

4 - Update and expand the definition of "dryclean" to reflect current practices and account for the advent of new solvents

If manufacturers or importers are permitted to use ISO symbols, the definition of "dry clean" is detailed with the type of solvents to be used (Perchloroethylene and Hydrocarbons – P, or hydrocarbons only – F).

Mentioning on a label "dryclean only" does not mean anything to a professional drycleaner, unless a specific solvent is indicated. However, new solvents (Rynex 3E, Sovon K4, D5...) are on the market, not fully integrated via international standard. There is an urgent need for testing and clarifying the actions of these new solvents, and their potential damage on to garments. International meetings of experts, sharing of results should be organized on the subject.

We highly appreciate your global approach and your support to reduce trade barriers.

Who is GINETEX?

GINETEX was first founded in Paris 1963 as an International Organisation after several International Symposiums for Textile Care Labelling at the end of the 1950's.

Since 1958, GINETEX has developed a global and language independent system based on pictograms, which contains the most important information to guide consumers during the life time of the article. The care labelling system is a global instrument covering practices from all over the world. Different care processes as well as different techniques must be taken into account.

GINETEX is an international non-profit association which finances communication on the meaning of symbols through its national member committees; all technical testing methods are based on ISO standards.

The pictograms used are registered trademarks in the countries of the Madrid Agreement. The care labelling system gives consumers and textile companies correct information on the care treatment of textile products. The processes indicated by the symbols will avoid any irreversible damage to the product.

GINETEX defines and promotes the system of care labelling symbols and coordinates its technical background on an international level. The essential technical elements for its implementation and the definition of the care labelling code are contained in technical regulations. The care labelling system is maintained to ensure that any new technical and ecological developments together with changes in consumer practices are taken into account.

GINETEX granted ISO the right to use the registered care symbols safeguarding the trademarks within the standard and welcomes the parallel development of ISO 3758. ISO recognises the authority of GINETEX in an agreement. It is available under:

http://standards.iso.org/iso/3758/ISO_Ginetex_TM_Agreement_22.11.2011

GINETEX is currently composed of 19 member countries in which national committees are mandated to represent GINETEX and to insure the correct use of the care symbols in their national territory.

Thank you very much for considering our international statement.

Yours sincerely,



François-Marie GRAU
President