

Drycleaning & Laundry Institute

i n t e r n a t i o n a l

Care Label Response

November 15, 2012

The Drycleaning & Laundry Institute (DLI) is pleased that the Federal Trade Commission (FTC) agrees that there is value in retaining and updating the Care Label Rule. The Care Label Rule is a benefit to all partners in the textile and garment industries—consumers, fabric care specialists, and garment manufacturers.

In response to the FTC's proposed changes to the Care Label Rule the Drycleaning and Laundry Institute offers that in our members experience a dryclean label is interpreted to mean 'do not wash' by many, if not all, consumers. There is a subset of consumers that will not buy anything with a dryclean label. If all methods of care are required to be on the label this consumer might be willing to purchase the item. The cleaner would then have the option of selecting a care method to satisfy the consumer yet still safely refurbish the garment.

Many drycleanable garments can be safely wetcleaned by *professional* cleaners since all factors of the process (time, temperature, chemicals, and agitation) can be carefully controlled. The exact number of domestic businesses that provide Professional Wetcleaning is not known but a majority of drycleaning establishments offer both drycleaning and wetcleaning. Consumers are not often aware of the needs or benefits of professional wetcleaning. Many consumers have only limited information about any aspect of the garment care process. Our cleaners indicate that consumers don't particularly care how their garments are cleaned – they just drop clothes at the counter and pick them up without any instructions at all as to the method of care. It is important that consumers not interpret wetcleaning as a process they can do at home and that is why the care label must state "Professional Wetclean."

Estimates indicate that 5-10% of drycleaners use solvents other than perc and petroleum. Perc users account for approximately 60% of the drycleaning industry and petroleum users account for 30% of the industry. Due to space limitations and expense most cleaners have only one solvent but informal queries indicate that whenever possible they have more than one, particularly if they are moving from perc or petroleum to an alternative solvent.

The greatest majority of garments we see in the Institute have fiber content on a label in the garment as required by the Textile Fiber Products Identification Act. The fiber content may or may not be included as a part of the care label. It would be advantageous to have all information on a single label but the label could become too large in some cases. Since manufacturers are not required to list all appropriate methods of care, the fiber content information is very important in helping professional cleaners and consumers decide if an alternate method of care other than that listed on the label will damage a garment.

Garments seen in the DLI testing lab usually have written care instructions. Symbols may be offered in addition to the written instructions but rarely alone. The basic symbols, such as the circle which indicates “dry clean” and the tub of water for “machine wash” are easy for cleaners and consumers to interpret. Problems arise when letters are inside the circle or dashes are below the tub. Professional cleaners can call their associations for interpretation, consumers can do a Google search but the care symbol meanings are not intuitive. The use of both ASTM and ISO care symbol systems will likely add confusion to the garment care decision. Manufacturers will need to decide which system to use, cleaners will need to learn both systems and there is no mention of who will educate the consumer.

The Rule needs clarification of the reasonable basis provision. Currently, a manufacturer can select care method based on tests of individual parts of a garment but not necessarily the entire garment. For example, a navy blue fabric and a white fabric might be tested separately and meet specified performance standards for colorfastness to drycleaning or washing. However, if both fabrics are used in the same garment it is very likely that the excess dyes in the blue fabric will transfer to the white fabric, resulting in an unserviceable garment. Reasonable basis for care labels should be based on tests that are performed on entire garments rather than individual components. Garment testing, preferably to standardized methods for valid results, that includes all components which are not easily removed, including beads, buttons, sequins, and interfacings, would result in more accurate labeling, thus benefiting businesses and consumers. It is also important the testing be valid for common practices in the United States.

There is a need to broaden the definition of drycleaning to include alternative solvents that are currently available and those that are yet to be developed. The change the FTC is proposing would allow the flexibility for development and use of alternative solvents.

Respectfully Submitted,

Mary Scalco
Drycleaning & Laundry Institute