

I included the following comments on the website form and also as an attachment in Word form to facilitate sharing my comments.

I have long been involved (more than 30 years) in this area serving on committees in AATCC, ASTM, and ISO (as a USA expert and delegate).

The ultimate in this area would be to have one set of symbols (language not an issue) used world-wide in labeling garments. The ultimate justification would be to provide consumers with full information to allow them to make informed decisions on how to care for their clothing. The properties of the fabrics involved are only half of the decision process. The nature of the soils to be removed is equally important in deciding the best cleaning methods. Some soils respond best to water based cleaning methods while others are best removed in a solvent (drycleaning) process. The balance of the two issues will be tempered by other considerations (costs, time, convenience, finishing method, etc.) unique to each individual consumer.

The ISO recommendation is to provide a complete set of care symbols including washing, bleaching, ironing, drying, and professional care. These symbols are consistent with those developed by ASTM. Wet cleaning is a viable option as defined and supported by ASTM and ISO test methods and if used would become a second professional care method a result in a total of up to six care symbols. This is a necessary method for certain combinations of soil and fabric.

The current FTC rule is weak in providing consumer information as it only requires the manufacture to provide a single care method and this method is not necessarily the best method (low labeling) and may not be successful in removing certain types of soils.

Manufactures argue that a complete set of symbols indicating all allowed care methods would increase costs due to the required testing or “reasonable basis” requirements. I don’t believe this is a valid argument as testing is not that expensive and would not result in a large increase in the cost of an individual item. Any additional costs would be reduced as universal testing would become the norm and result in reducing testing costs per item. There would be offset savings (hard to measure) to the consumer in reducing the amount of unserviceable items due to damage or soils that could not be removed. This savings is hard to measure

as I believe most consumers do not report issues of damaged, stained or garments that cannot be cleaned adequately.

I encourage strengthening the rule and giving consumers more information by requiring a complete set of 5 care symbols (6 if wet cleaning is included). This would also be a major step toward harmonizing world-wide care labels using the ISO symbol set.

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