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### Care Labeling Rule, 16

### CFR Part 423, Project No. R511915

Dear Sirs,

As an international association, GINETEX - International Association for Textile Care labelling – would like to express a public comment on Care Labelling Rule 16 CFR Part 423 Project No.R511915.

#### **Who is GINETEX?**

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

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

GINETEX is a non-profit association which finances communication on the meaning of symbols through its national member committees and bases all technical testing methods 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 the 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 is currently composed of 18 country members in which national committees are mandated to represent GINETEX and to insure the correct use of the care symbols in their national territory.

### **GINETEX and ISO, International Standard Organisation**

With a view to facilitating Standards work on textile care labelling at international level, in 1987, GINETEX and ISO have reached an agreement in which GINETEX agreed that ISO uses the GINETEX symbols in the international standard ISO 3758 while ISO was preserving the GINETEX's ownership rights related to the marks under the terms of this agreement. This agreement is still valid until today.

### **GINETEX and Care Labelling Rule 16 CFR Part 423 Project No.R511915.**

Through the presence of a label on an item, consumers are informed in a precise manner about the fibre content, the care and the sizing. If the information is too detailed, the consumer may be tempted to get rid of the label, therefore losing valuable information for the lifetime duration of the article.

The Rule should define precisely that the care labelling mentioned indicates the maximum treatments that can be applied on a textile article (washing, bleaching, drying, ironing, and professional cleaning). Therefore, the manufacturer will not fail to have reasonable basis for care instructions. And it is up to the consumer to decide if he needs to wash at the maximum temperature for example, or colder. The consumer and the drycleaner will not have a misleading information for the care treatment.

The Rule should not be mandatory for textile and apparel companies. In a voluntary scheme, dynamics of technical and environmental developments as well as innovations can be adapted in due time, as opposed as in a mandatory environment, when the administration is asked to react and legislate quickly. Legal adjustments are very cumbersome to implement. As experience shows, legal provisions in care labelling lead producers to adopt an overly cautious approach in their textile care recommendations. This is neither in the interest of care labelling nor in the interest of the consumer, but requires intensive verifications and inspections. Furthermore national laws in care labelling are largely too restrictive or not fully in line with international standards and could be considered as creating an additional non-tariff barrier to trade; in order to reduce the adverse impact for EU exporters (costs and additional customs controls, etc.). The ASTM regulations therefore create unnecessary obstacles to international trade.

The Commission should consider the latest developments within the ISO, especially the FDIS ISO 3758:3. Indeed the Rule should harmonize with this international standard, as far as symbols are concerned, and as far as interpretation of the label is concerned.

Today, FTC Rule for care labelling prevents a global ISO Standard.

The ASTM symbols and the GINETEX/ISO symbols are similar but not “the same”. In every country, the GINETEX/ISO symbols are recognised and used (even in China) except in South Korea, Japan and the USA. However, Japan is working at present on the harmonization of ISO and JIC Standards in preparation for the near future.

The philosophy of the ISO 3758 is to give information on all maximum, authorized or not, care treatment, washing, bleaching, drying, ironing, and professional care. The philosophy of the 423 CFR is to give information, but one does not know if the process indicated can damage the article:

For example, if an instruction states “dry flat”, one does not know if tumble drying damages or shrinks the textile article. In the ISO standard, in that case it is mentioned that tumble drying is forbidden, and “dry flat” treatment is the most severe treatment that can be applied to the article.

Finally the used US natural drying processes are technically not all-embracing! Therefore ISO decided to complete this symbolisation by adding the missed procedures, and with regard to the optical problems for the symbol range “drying in shade” to simplify the symbol graphics. All countries agreed to such a perfecting, apart from the US-delegation in reference with unchangeable FTC rules!

If today a US company exports to Europe and Japan, it needs different care label! For the sake of the consumers, it is important to keep the mentions label as accurate as possible and not too long, to avoid the fact that the consumer cut it. The experience shows that consumer mainly cut out multi-lingual and extensive labels.

### **GINETEX Conclusion**

The GINETEX labelling requirements for textile products are based on a constructive basis and in the most helpful way for the consumer, retailers and the textile and apparel industry. The current voluntary and proved successful care labelling symbol system is a product of an efficient collaboration with the professional federations of the above mentioned sectors concerned and the standardization.

GINETEX advocates FTC to choose this efficient way of the international applicable care labelling system based on

- symbols which are clear and readily understandable, easy to use and not dependent on any particular language,
- a voluntary level,
- international trademarks (Madrid convention),
- ISO standard for worldwide use.

We highly appreciate your global approach and your support to reduce traffic barriers. Thank you very much for considering our international statement.

Best regards.

François-Marie GRAU

President