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Required Text: Care Labeling Rule, 16 CFR Part 423, Project No. R511915

Dear Secretary Clark:

The Toxics Use Reduction Institute (TURI) at the University of Massachusetts Lowell provides resources and tools to help make the Commonwealth a safer and more sustainable place to live and work. Established by the Massachusetts Toxics Use Reduction Act (TURA) of 1989, TURI collaborates with businesses, community organizations and government agencies to reduce the use of toxic chemicals, protect public health and the environment, and increase competitiveness of Massachusetts businesses.

Over 80% of the U.S. professional garment cleaning industry today uses the chemical perchloroethylene (perc) to clean clothes. Studies have identified ecological and human health hazards associated with perc usage. The National Institute for Occupational Safety and Health has recommended that perc be handled as a human carcinogen, and the Environmental Protection Agency has classified it as a probable human carcinogen.

TURI is currently working with dry cleaners across the state to promote the use of wet cleaning as an alternative to traditional perc dry cleaning or other less desirable alternatives, such as hydrocarbons. Educational and outreach efforts are underway to inform the cleaners about the harmful effects of perc and the benefits of converting to wet cleaning. To date, we have awarded grants to four dry cleaners to assist them in switching from perc dry cleaning to professional wet cleaning technology. They have experienced many benefits from professional wet cleaning, including: decreased use of resources such as electricity, gas, oil, and water; significant air quality improvement in the shop; improved employee health and satisfaction with their work environment; payback on investment in about 4.5 years; and increased interest by consumers in patronizing an environmentally friendly shop.

The Commission has requested comment on whether the Care Labeling Rule should address the practice of professional wet cleaning. We believe that our experiences and perspective from several years working both with dry cleaning and professional wet cleaning, will help inform the Commission's final rule, and so we offer the following comments.

*Professional wet cleaning is a proven, effective technology, and the process is sufficiently robust that labeling is appropriate.* The cleaners we have worked with have found they are able to maintain their quality of work and even get the clothes brighter and the whites cleaned whiter. Once the technology is mastered by the cleaners, there have been no increased claims (requests for reimbursements from customers for damaged garments), re-dos (the need to send a garment back through the cleaning and finishing process), or send-outs (the need to send a garment to another shop using another technology) by the shops we have worked with. Therefore, if a garment is labeled with "professional wet clean," cleaners and consumers can be confident that the garment can be successfully cleaned in this manner.

*Limiting labels to “dry clean only” will hinder the diffusion of this innovative, safer technology. To maintain a care labeling system that includes “dry clean only” and not “professional wet cleaning” is limiting the spread of this safer technology. Consumers are left with a concern that they might have their clothes ruined if they are not “dry cleaned” using traditional methods; and cleaners are left with a concern that they will be held liable for any damage to a garment if they do not use traditional solvent “dry cleaning” methods.*


*Applicable standards and test methods have been developed to support the labeling. There is now an International Standardization Organization (ISO) definition of professional wet cleaning and a professional wet cleaning care label instruction (including a symbol system), as well as a standardized test procedure for professional wet cleaning. Therefore, including professional wet cleaning in the Commission’s Care Label Rule can be implemented effectively by garment manufacturers and cleaners.*

*A mandatory professional wet cleaning instruction will provide consistent information to cleaners. As a mandatory instruction, cleaners will understand that they are being provided with all pertinent information and that the information on the care label was not simply up to the discretion of the garment manufacturer.*

In summary, TURI’s experience with garment cleaners supports adding professional wet cleaning as an instruction under the Care Labeling Rule. Inclusion of professional wet cleaning as a mandatory instruction will assist all those in the garment supply chain – textile and garment manufacturers, consumers and cleaners – in ensuring quality and consistent care of garments. Following the ISO standards and test procedures will provide the best basis for this to take place. The labeling will also support continued acceptance and conversion to professional wet cleaning within the dry cleaning sector, creating safer and healthier neighborhoods in which to live and work. We would be happy to share additional information about our experiences with this sector if that would be helpful to the Commission. Please feel free to contact Joy Onasch ([Joy\\_Onasch@uml.edu](mailto:Joy_Onasch@uml.edu) or 978-934-4343), TURI’s technical expert on wet cleaning.

Sincerely,

  
Elizabeth Harriman, Deputy Director

  
Joy Onasch, Community Program Manager