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Donald S. Clark
Secretary of the Commission
Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580

September 6, 2011

RE: Professional Wet Clean Instruction, Care Labeling Rule

Dear Mr. Clark;

This is to respectfully ask the Federal Trade Commission (FTC) to include the Care Labeling Rule in the 2011 Regulatory Review Schedule.

Since 2000, the last time the Federal Trade Commission amended the Care Labeling Rule, a lot of progress has been done in the professional Wet Cleaning industry to warrant the need for this label. Although the vast majority of dry cleaners in the United States continue to operate machines with perchloroethylene (PCE), a chemical listed in the Clean Air Act as a hazardous air pollutant, many state agencies, as well as the USEPA, are now taking steps to reduce the use of this toxic chemical.

In California alone, over two-hundred PCE dry cleaners have switched to professional wet cleaning and have been able to successfully process the full range of garments they previously dry cleaned.¹ This suggests that the vast majority of garments currently labeled 'dry clean' or 'dry clean only' could be labeled with a wet cleaning instruction.

In moving forward with developing the professional wet clean instruction, the experience in California may assist the Commission on the question of wet cleaning results on "dry cleaning only" labeled garments. During the last round of deliberation, the Commission raised the issue of the prevalence of professional wet cleaning in evaluating how widely the label would be used. Commenting on this issue, *American Drycleaner*, a leading trade journal, wrote:

¹ Sinsheimer P, Grout C, et al. (2007) The Viability of Professional Wet Cleaning as a Pollution Prevention Alternative to Perchloroethylene Dry Cleaning *Journal of the Air & Waste Management Association* 57:172-178.

“If the Federal Trade Commission (FTC) offers a ‘Professionally Wetclean’ care label as an option for garment manufacturers, the pace of adoption will accelerate somewhat. If the FTC makes the instruction mandatory, then wetcleaning may indeed be the wave of the future.”²

Certainly the future in moving forward with developing the professional wet clean instruction is now.

In efforts to reduce workers and consumers exposure to the negative health effects of Perc, the Coalition for Clean Air has been a leading advocate of safer garment care technologies. We are strongly confident that a new label on garments will be one more step forward in this process.

We look forward to working with the FTC on developing the new instruction. Please feel free to contact us should we be of assistance.

Sincerely,

Luis R. Cabrales,
Deputy Director of Campaigns
Coalition for Clean Air

Cc: Stephen Ecklund, Investigator
Division of Enforcement
Federal Trade Commission

² American Drycleaner (1999). *Care Label Rule*. 9, 70.