



September 6, 2011

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex A)
600 Pennsylvania Avenue, NW
Washington, DC 20580

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

Dear Madam/Sir:

The purpose of this letter is to submit The Clorox Company's comments regarding the Federal Trade Commission (FTC) review of the Care Labeling Rule ("Rule").

Clorox, with world headquarters in Oakland, California, is a manufacturer and marketer of many well-known and trusted consumer products, including our namesake bleach and cleaning and disinfecting products, Green Works[®] home care products, Pine-Sol[®] cleaners, Fresh Step[®] cat litter, Kingsford[®] charcoal, Hidden Valley[®] and K C Masterpiece[®] dressings and sauces, Brita[®] water-filtration products, Glad[®] bags and wraps and containers, and Burt's Bees[®] natural personal care products. Clorox is strongly committed to maintaining the safety of our products and minimizing the impacts of our products and manufacturing processes on the environment, as well as understanding the public health benefits that our products provide.

Our company has been actively involved for many years in educating textile manufacturers and consumers about care instructions, including the care labeling rule. During this time, we have observed the benefits of the Rule as the vast majority of consumers depend on accurate care labels to maintain the integrity of their clothes. It has been our experience that:

- The Rule is important and benefits consumers;
- The Rule helps manufacturers to meet consumer performance needs and has resulted in better quality products from fabric suppliers and vendors.
- The Rule (and resultant guidelines) is clear insofar as what textile care is included, the criteria for compliance, and penalties for noncompliance;
- There have been no reports by compliant manufacturers of any negative consumer impact; and, most importantly,
- A number of apparel manufacturers are not fully compliant.

As such, there are specific areas of the rule that we believe would benefit from revisions and clarifications as follows:

- Global harmonization of the care symbols would be ideal; absent that, Clorox enthusiastically supports the continued efforts by FTC and non-governmental organizations to help educate consumers and garment manufacturers on the correct use and interpretation of the symbols.
- The addition of "wetcleaning" should be given serious consideration by FTC because of its consumer and environmental benefits. With the development of the International Organization for Standardization (ISO) standards for "wetcleaning," there now appears to be consensus that a new test provides clear testing protocols to verify a safe care process.

- “Reasonable basis” for purposes of compliance should be better clarified. It is our understanding that at least some regulated parties seem to be misinformed or misunderstand what “reasonable basis” means. We believe that the apparel industry looks at care labeling from the perspective of “risk management” versus consumer information. Presenting “unreasonable” and “possible” fabric impact should not be acceptable. Instead, we suggest that the FTC request fresh data from the manufacturers for what the “reasonable basis” is for their current care instructions. Compliance based on no data – or obsolete data given changing consumer habits (e.g., with the advent of high-efficiency washing machines) – should not suffice as an acceptable argument once it is found that a garment label is out of compliance. Given there is standardized testing (e.g., ASTM methodology) for colorfastness and garment integrity (e.g., tensile strength), actual data should be required from the manufacturer by FTC. If there is no data, the label should be changed. As stated above, no negative consumer impacts have been reported by compliant manufacturers.

We appreciate the opportunity to comment on this important rulemaking proceeding and would urge your serious consideration. If you have any questions, feel free to contact Gregory van Buskirk, Clorox Global Stewardship and Innovation Department, 925-425-6344.

Sincerely,


Victoria Jones
Vice President – Government Affairs & Community Relations

c: Gregory van Buskirk