



May 14, 2008

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex B)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Green Packaging Workshop – Comment, Project No. P084200

The purpose of this letter is to provide Clorox's comments in response to request by Federal Trade Commission for comment in regards to the review of the Guidelines for Environmental Marketing Claims ("Green Guides").

The Clorox Company, with world headquarters in Oakland, California, is a manufacturer and marketer of many well-known consumer products, including our namesake bleach and disinfectant cleaning products, Green Works® natural cleaning products, Armor All® and STP® auto-care products, Fresh Step® and Scoop Away® cat litter, Kingsford® charcoal and barbecue products, Hidden Valley® and K C Masterpiece® dressings and sauces, Brita® water-filtration systems, Glad® bags, wraps and containers, and Burt's Bees® natural personal care products.

Clorox is strongly committed to fostering the safe use and disposal of our products and minimizing the impacts of our products and packaging on the environment, as well as advancing the public's understanding of the valuable benefits that our products provide.

Our company supports the need for the Green Guides and the use of qualified claims. We also support the comments submitted by The Soap and Detergent Association, Consumer Specialty Products Association, Grocery Manufacturers Association and the American Chemistry Council with respect to FTC's review of the Green Guides and respectfully request your consideration of those comments as well as the following additional comments.

Environmental Claims and Life Cycle Assessment

Clorox recognizes the increased use of general environmental claims in the market. Life Cycle Assessments can be used to examine a product's environmental impact, beginning with its raw materials and ending with its disposal. However, Life Cycle Assessment should not be the only tool used to substantiate general environmental claims about a product. This methodology is often complex, hard to interpret, expensive, and is based on numerous assumptions. The Clorox Company does recommend that when making broad environmental claims about a product, companies provide clear substantiation regarding which attributes the claim is referring to so as not to mislead consumers.

Third Party Certification and Seals

The Clorox Company agrees that some environmental seals-of-approval, eco-seals, and certifications from third-party organizations provide value in the marketplace. When properly displayed, third-party certifications provide information to consumers regarding a product's environmental attributes.

We appreciate the opportunity to comment on this important policy. Please feel free to contact Robin Gentz, Manager, Government Affairs, 510-271-7081, if we can provide any additional information.

Sincerely,

Victoria Jones
Director of Government Affairs

P.O. Box 24305
Oakland, California
94623-1305

(510) 271-7000