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Federal Trade Commission
Office of the Secretary, Room H-135 (Annex J)
600 Pennsylvania Avenue, NW, Washington, DC 20580
RE: Guides for the Use of Environmental Marketing Claims

Dear Sir or Madam:

As the world's leading premium drinks business, Diageo applauds the Federal Trade Commission (FTC) for attempting to make environmental marketing claims more consumer friendly. In your deliberation as to how to update the *Guides for the Use of Environmental Marketing Claims* or "Green Guides," we ask that you preserve the rights of companies such as ours to use Please Recycle on products. If this proposed rule is to regulate actual claims, Please Recycle is not a claim but an encouraging reminder used by many responsible companies.

Diageo (Dee-AH-Gee-O) beverage alcohol brands span the spirit, wine and beer categories. These brands include Johnnie Walker, Guinness, Smirnoff, J&B, Baileys, Cuervo, Tanqueray, Captain Morgan, Crown Royal, Beaulieu Vineyard and Sterling Vineyards wines. Diageo is a global company, trading in more than 180 countries around the world.

One of the nuances of the alcohol business is we are required by law in some instances to age or hold products — many times over several years. Our products also have a very long shelf life and sit in warehouses longer than many other commodities. Should this proposed rule eventually affect the Please Recycle reminder, please allow for us to sell the inventory emblazoned with Please Recycle without penalty.

Thank you for the opportunity to comment.

Sincerely,

Elizabeth Wise
Director, Government Relations