



December 10, 2010

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

Re: Proposed Revisions to the Guides for the Use of Environmental Marketing Claims  
("Green Guides") (75 Fed. Reg. 63552 (October 15, 2010))

Arkema Inc. (Arkema) appreciates the opportunity to provide these comments to the Federal Trade Commission's proposed revisions to the Green Guides. Arkema is a manufacturer of chemicals and operates 23 manufacturing and research and development facilities in 14 states with over 2,200 employees across the United States.

As the Federal Trade Commission (FTC) finalizes its revisions to the Green Guides, we urge the FTC to consider including additional clarifying language that will address certain refrigerants claiming to be "natural." Our concerns particularly relate to refrigerants where products labeled as "natural" could be construed as "environmentally friendly." However, since "natural" refrigerants (hydrocarbons and those noted below) often require significant processing and significant consumption of energy in their production, such claims could be misleading. Production of carbon dioxide and ammonia, sometimes used as refrigerants, also require significant processing and energy consumption during production. Therefore, we believe there are no non-ozone depleting chemicals that can qualify as "natural" refrigerants. We believe it would be helpful for FTC to provide additional explanatory language or additional examples to ensure clarity in this particular, but important area.

Thank you for the opportunity to provide our comments. Please do not hesitate to contact us if you have any questions or if we can provide additional information.

Respectfully submitted.

Tom Werkema  
Vice President and Director, Regulatory Activities