



Toxics Use Reduction Institute
University of Massachusetts Lowell
600 Suffolk St., Lowell, MA 01854
(978)934-3275 fax: (978)934-3050
www.turi.org

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To be filed online via:

<https://ftcpublishcommentworks.com/ftc/carelabelingruleroundtable>

Re: Care Labeling Rule, 16 CFR Part 423, Project No. R511915; Roundtable March 28, 2014

Dear Secretary Clark:

The Toxics Use Reduction Institute (TURI) at the University of Massachusetts Lowell provides resources and tools to help make the Commonwealth a safer and healthier place to live and work. Established by the Massachusetts Toxics Use Reduction Act (TURA) of 1989, TURI collaborates with businesses, community organizations and government agencies to reduce the use of toxic chemicals, protect public health and the environment, and increase competitiveness of Massachusetts businesses.

Joy Onasch, the Community and Small Business Program Manager at TURI, participated in the FTC Care Labeling Rule Roundtable on March 28, 2014 as part of the Professional Wetcleaning panel. TURI previously submitted comments to the FTC regarding our experience with the dry cleaning sector and professional wet cleaning. We would like to take this opportunity to re-iterate and clarify specific points discussed during the roundtable.

- 1. Requiring versus permitting a wetcleaning instruction.** TURI's experience with the dry cleaning sector supports the need to require a wetcleaning instruction on garment care labels. Should the label only be permitted, there would not be complete information provided to the customer and the service provider in a consistent manner. If a garment came in for care at a shop that provided both dry cleaning and wetcleaning services, and there was no wetclean care label, the cleaner would not know in which manner the garment could be safely cleaned as they would not know if the garment had been fully evaluated, or simply skipped for evaluation.
- 2. Cost of substantiating wetcleaning instructions.** TURI does not have specific data on this item, but does support the data collected and provided by UCLA at the roundtable as it was collected from wetcleaners providing appropriate services.
- 3. Availability of wetcleaning.** Approximately 3% of cleaners in Massachusetts operate as dedicated wet cleaners, however, a much greater percentage offer wetcleaning as part of their suite of cleaning technologies. During the roundtable, the topic of cost of wetcleaning was discussed. The FTC moderator questioned a figure in a TURI report from 2012 that states that wetcleaning averages \$1.10 per pound cleaned and noted that this was slightly higher than perchloroethylene or hydrocarbon. Referring to page 13 of that report (Assessment of Alternatives to Perchloroethylene for the Dry Cleaning Industry, Methods and Policy Report No. 27, June 2012) that number was actually cited from an Institute for Research and Technical Assistance report from 2005 (Evaluation of New and Emerging Technologies for Textile

Cleaning). Therefore, we believe that this cost data is somewhat out of date for use in this decision making process. In 2013 TURI collected data from cleaners using various alternatives to perchloroethylene and calculated a cost per piece. The lowest cost per piece was for wet cleaning. The data is presented in the Dry Cleaners Environmental Certification Workbook on page 58 – the report can be accessed at:

<http://www.mass.gov/eea/agencies/massdep/service/approvals/dry-cleaner-forms.html>.

4. **Consumer awareness of wetcleaning.** Though we have not done an official survey to gather data on this topic, we do speak to public audiences quite often on the subject of dry cleaning and professional wetcleaning, and our experience has been that the public does not have an understanding of what wetcleaning is.
5. **Content of Instruction.** It has been our experience at TURI that it is very important to include the full phrase “professional wet cleaning” and not just “wet cleaning” to ensure that the public and the dry cleaners as well understand that the technology is different from home laundering in water.

We would be happy to share additional information about our experiences with this sector if that would be helpful to the Commission. Please feel free to contact Joy Onasch (Joy_Onasch@uml.edu or 978-934-4343), TURI’s technical expert on wet cleaning.

Sincerely,

Elizabeth Harriman, Deputy Director

Joy Onasch, Community and Small Business Program Manager