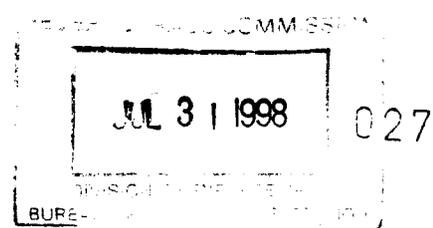




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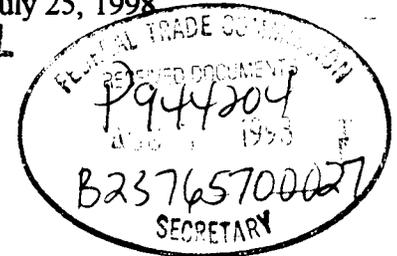
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Office of the Secretary
Federal Trade Commission, Suite 4302
Sixth St. & Pennsylvania Ave., NW
Washington DC 20580

July 25, 1998
ORIGINAL

AUG 14 1998



Dear Secretary,

Greenpeace USA's toxics campaign has been working for years to phase out the use of chlorinated solvents perchloroethylene in dry cleaning and other processes around the world. We are pleased to see that the Federal Trade Commission is proposing amendments to the Care Labeling Rule that would reduce the exposure of the public and environment to perchloroethylene. In that spirit, we offer the following comments about the Trade Regulation Rule on Care Labeling of Textile Wearing Apparel and Certain Piece Goods (16 CFR Part 423), as requested in the Federal Register on May 8, 1998.

When Greenpeace first starting working on this issue, we identified Professional Wetcleaning as an environmental alternative to toxic solvent use in clothes care. In our report *Dressed to Kill*, published in 1994, we pointed to the fledgling wetcleaning method as one way to reduce the use and release of perc from drycleaning. Since that time, wetcleaning equipment companies have sold thousands of machines, and the number of companies selling the integral wetcleaning chemicals has multiplied in the US. The chemicals are even more important than specialized machines for beginning wetcleaning; while shops doing 100% of clothes in wetcleaning processes do largely rely upon specialized machines for efficiency's sake, any dryclean shop can add some wetcleaning services with good laundry equipment, proper chemicals, and the right attitude. While some training is required in order to do this, indications are that such training is becoming available in this country: one of the first facilities dedicated to such training just opened in the Cleveland area in July of 1998. Others will soon follow. We will be illustrating the spread of this industry in a new report this year, entitled *Out of Fashion*.

We support the FTC's contention that consumers want to know from a care label whether a garment can be cleaned at home, in water-based laundry systems. Such a prioritized label would stop the mislabeling of many garments as "Dry clean", which leads many customers to believe it cannot be washed at home. Correct labeling of such garments would increase customer convenience and reduce perc usage. However, for those clothes that cannot be home washed, either wetcleaning or drycleaning may be appropriate, though the former is preferable from an environmental point of view. Even though Professional Wetcleaning is the newer technology, such service is already widely at dryclean shops around the country. Customers may not know it, but many of the garments they bring in are already cleaned in water by professional cleaners.

Customers bring clothes to drycleaners for two reasons: because they cannot clean them at home, or because they can, but it is more convenient to have professionals do it (primarily a time savings, especially as it can take a long time to get certain garments "finished" properly at home). The proposed rule would allow wetcleaning to be listed, but would require another care method to be listed as well. This would mean that any manufacturer which wished to list wetcleaning as the preferred method would still have to label it for drycleaning (since if it were home washable it would be listed as such under the proposed rule). Thus manufacturers would have an economic reason to list drycleaning instead, as it would require only one test process instead of two.

Most important is that the final care label rule must do more than allow a professional wetclean label—it must recognize wetcleaning as an accepted care method. Trade associations in the United Kingdom, Canada, and the United States have begun to state that modern wetcleaning could be considered the equivalent of drycleaning. In the US, the International Fabricare Institute has stated that with the right commitment "a plant may achieve higher than 80% wetcleaning," a tacit admission that some of their member shops do approximately 100% of their garments in wetcleaning systems. One way to facilitate this professional acceptance is to take away any impediments to manufacturers to using the wetclean label, so that it can compete equally with drycleaning.

One good example is the addition of fiber content information on the care label; if only required on the wetclean label, it is an extra burden (creating a bigger label, if nothing else) that might dissuade garment companies from using the wetclean label. Here, however, we do not think the answer is to remove the information, but rather to include it on all labels. We are sure that all professional cleaners could use this information, especially in mixed shops where they may be deciding between using a wet or dry method; along with the content of particular stains, the fiber type is the most important piece of data needed. Consumers washing clothes at home will also appreciate being able to find this information, especially if clothing types they are used to seeing labeled "Dry Clean" begin carrying "home washable" labels. In the end, it seems best to require fiber information on all care labels.

Similarly, manufacturers should not have to state what type of equipment can be used in wetcleaning. While there is some variation in specifications and capabilities of wetcleaning machines (to be expected in a field still going through developmental stages), the definition of wetcleaning suggested by the FTC seems to define wetcleaning too narrowly. We feel that the definition suggested by one of the most respected names in this field, the Center for Neighborhood Technology, is best. It states:

Wetcleaning is the cleaning of clothes in a commercial setting with a water-based system that utilizes specially formulated detergents, and precise control (either manual or computerized) over the mechanical action, water temperature and level, and carefully regulated drying. Wetcleaning spotting is done by using products designed for the process that can be safely discharged to sewer systems. Pressing of wetcleaning garments may be done with conventional professional pressing equipment, or with tensioning finishing equipments and/or drying cabinets for greater productivity.

There are many different types of wetcleaning, and shops can learn how to do many of them, with resources now available. Shop owners tailor the systems and training they get to the needs of their customers. Only if a manufacturer believes that a certain type of wetcleaning equipment is necessary to wetclean a garment should it be required to state so of the label. Otherwise, successful wetcleaning by any method should be a reasonable basis for stating that a garment is wetcleanable.

Greenpeace feels that an environmental impact statement would be helpful in deciding how to finally amend the proposed Care Labeling rule. While the benefits would be indirect, we fear that the proposed label guidelines would allow the use of "wetclean" label while discouraging its actual use. As the CEC noted in the last round of comments, wetcleaning may actually be more safe for environment than home laundry, though it probably would not be as cheap or convenient. One reason an environmental impact statement would be helpful is that Greenpeace is concerned that the allowances for wetcleaning have been added as Band-aids without changing the fundamental basis of the law. For instance, in the proposed version of section 423.6(b), we are dismayed to read that "if a product would be harmed by both washing and by dry cleaning, the label might say... 'Cannot be successfully cleaned.'" This is misleading and wrong, and obviously exists as a holdover from the old rule. Such a garment might respond very well to wetcleaning. If the government wants to minimize the use of toxic solvents, all garments that are home washable should be tested to show it; then it would make sense to require wetcleaning next (especially in those cases where a garment can be cleaned but not finished satisfactorily at home); only if both methods fail should drycleaning be tested.

Thus we believe the "Professionally Wet Clean" label should be required on all garments which can be wetcleaned but not washed at home. The "Dry clean" label should be a last resort until an environmentally sound drycleaning method becomes widely available, at which time another EIS might be needed. In particular, we understand that a liquid carbon dioxide system might become commercially available to cleaners by the beginning of 1999. Until such a time, we would like to see the Rule reflect that wetcleaning is preferable to drycleaning wherever possible, both for the sake of human health and the health of the planet.

Finally, Greenpeace wishes to make some comments on the availability question. The fear that consumers will not be able to find wetcleaning services seems due to the fact that many drycleaners do not currently advertise such a service. However, numerous trade groups have stated that a large proportion of current drycleaners already clean some proportion of clothes in traditional laundry equipment, though their customers may not know it. CNT has estimated that, with the right training and new wetcleaning chemicals, such cleaners can clean up to 40% of what they get with no new equipment.

As a group that has maintained a database of where wetcleaning is offered, Greenpeace lists fewer than 200 wetcleaners, though we know (from industry and EPA sources) that over 4000 wetcleaning machines have been sold. Thus, many cleaners have this capability but are not advertising it. Why? In part because many are mixed use shops,

and don't want to create what they see as an unnecessary stir about perc's effects, and in part because there is no added value to telling customers that a large portion of clothes are cleaned in water as of yet. Ironically, in a "catch 22", FTC wants to prove availability before it requires such a label, but cleaners are waiting for such a label to begin advertising the service. Only when consumers begin asking for solvent-free cleaning will cleaners volunteer that they can do it, but one of the best ways to educate consumers to ask for such a process is on the care label. Most drycleaners can easily be professional wetcleaners if they see value in it.

By making wetcleaning at least an equal care method to drycleaning, FTC can effectively demonstrate how widespread this service is, and communicate to those who know little else of government's interest in toxic substances such as perc that alternatives exist. Consumers need to understand that water-based cleaning is preferable in many ways; such an understanding may well bring increased business to shops offering this service. As the public's awareness of the toxic chemicals used in traditional drycleaning grows, there will be significant value in shops advertising this process. Then, and only then, will we see widespread interest on the part of garment manufacturers to make clothes based on their understanding of what can be wetcleaned, which may inform fabric and trim decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "David DeRosa". The signature is fluid and cursive, with a long horizontal stroke at the end.

David DeRosa
Dry Cleaning Toxics Campaigner
Greenpeace USA