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Nos réf. : JFG/ngc n° 3105

Dear Mrs VECELLIO,

Please find following copy of GINETEX answers to the last FTC notice of proposed rulemaking (ref. 16 CFR Part 423 – Care Labeling Rule – Comment).

We are very sorry for the delay and we hope that this paper can still be taken into consideration.

We hope to see you in a future meeting either ASTM or ISO.

Sincerely yours.

For GINETEX
Nathalie GAMET-CORINALDI
Secretary of Legal Committee



GINETEX

Groupement International d'Etiquetage pour l'Entretien des Textiles

International Association
for Textile Care Labeling



Internationale des Groupements pour
le Pliage et l'Entretien des Textiles

FEDERAL TRADE COMMISSION

September 7th, 1998

16 CFR Part 423 – Trade Regulation Rule on care Labeling of Textile Wearing Apparel
and certain Piece Goods.

A – Requiring Instructions for Cleaning in water.

(1) Is there empirical evidence regarding whether consumers interpret a "dry clean" instruction to mean that a garment cannot be washed ?

No, there is no empirical evidence regarding whether consumers interpret a "dry clean" instruction to mean that a garment cannot be washed.

We do not face this problem within GINETEX countries because using the GINETEX / ISO system, both instructions (washing and drycleaning) are required.

(2) How many domestic businesses provide professional wet cleaning, as defined in Part D.1. above, to the public on a regular basis ?

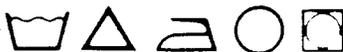
It is difficult to give a precise answer to this question.

It depends on different countries and the fact that wetclean, as a recent technic, has not been developed the same way in each country. This development was more or less rapid depending on the country.

(3) Should the Rule provide that, if an instruction for professional wet cleaning is provided, no other instruction need be given, or should a professional wet cleaning instruction only be allowed along with another cleaning instruction ?

GINETEX / ISO system is based on a minimum number of symbols, yet providing the necessary information to prevent irreversible damage on the concerned textile.

So, we are in favor of indicating any care process as long as it is to prevent irreversible damage.



B – The Reasonable Basis Requirement of the Rule

- (4) Would the amendment of Section 423.6 © (3) of the Rule, which provides that a reasonable basis can consist of reliable evidence that each component of the garment can be cleaned according to the care instructions, to state, additionally, that a manufacturer or importer must possess a reasonable basis for the garment as a whole, clarify the reasonable basis requirements ? Is any additional clarification needed ?**

In the ISO/GINETEX System, each component of a textile article must be taken into consideration for the definition of a correct care label.

But the way each component is gathered is also very important to decide whether the piece of cloth is cleanable or not.

Therefore, the garment as a whole has to be tested to define the last and final combination of care symbols to be reproduced on the label.

C – Definitions of Water Temperatures

- (5) How can consumers best be made aware of the approximate water temperatures in which they can safely and effectively wash their clothing ?**

How can consumers best be made aware of how these temperatures correlate to the descriptors "hot", "warm", and "cold" ? Do consumers need to determine the actual or approximate water temperature in their washing machines when they select "hot", "warm", and "cold" on their washing machine dials, and, if so, how could they easily and practically do this ?

Could consumers use this information to select the optimal temperature offered by their washing machines for clothes labeled for "hot", "warm", or "cold" washing ?

In the ISO / GINETEX System, the system of temperature (in Celsius) given in the washtub symbol has been adopted to avoid confusion for the consumer.

Terms like "hot", "warm" and "cold" are too general and not precise enough.

This problem of water temperature is also different in the United-States and in Europe.

In Europe, the washing machines heat the water which arrives cold or cool. So, the Consumer chooses a precise temperature given on the machine and the machine is programmed to heat the water up to the chosen temperature.

- (6) Would consumers understand an instruction to use "very hot" water ?
Could consumers use this information either to select the optimal temperature offered by their washing machines for clothes labeled for "very hot" washing or to determine that such clothes should be washed by a professional cleaner ?**

Same answer as for (5)