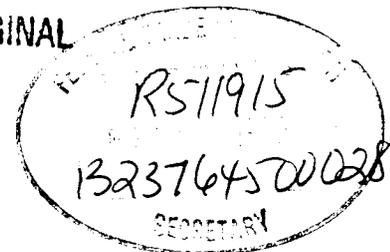




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ORIGINAL



February 26, 1999

Office of the Secretary
Federal Trade Commission
600 Pennsylvania Ave NW
Washington, DC 20580

Dear Secretary Clark:

Greenpeace would like to add a few comments to the record of the January 29 Workshop, regarding proposed amendments to 16 CFR part 423, Care Labeling of Textile Wearing Apparel. Greenpeace was pleased to see that the FTC has been harmonizing its work with the EPA's goal of decreasing the use of harmful solvents such as perchloroethylene. Simply getting those clothes which can be home laundered to be labeled as such will prevent confusion for consumers, thus making it more likely they wash suitable clothes at home, and decreasing perc use in that way. However, people will continue to take clothes to Professional Cleaners, whether for convenience sake or because they cannot be washed at home. As that is true, we remain concerned that environmentally preferable options, such as wetcleaning, are still outside the current purview of labeled garments.

The Need for a 9 Month Extension of the Record on Wetcleaning Issues

Greenpeace does not see any need to extend the comment period, and remains convinced that any further delay hurts those businesses which have already moved into environmentally sustainable cleaning methods. That said, we understand that some technical issues (including the development of a test protocol) are not completely agreed upon, so the need to move forward is balanced by the need to provide a reasonable basis for any claims made about a garment's wetcleanability.

We believe that another option, one where the rule to require wetcleaning moves forward but has a phase-in time of a year or so, would give a clearer endpoint to this process. For 99% of garments in this country, a reasonable basis is already in place: the knowledge of our existing wetcleaners. One expeditious way to access that knowledge would be through the Professional Wetcleaning Network; they could help manufacturers find local cleaners.

Obviously, this would not obviate the need for a formal testing method, but this expertise base would also serve as a good check for any technical definitions. Once this technical work begins in earnest through ASTM and AATCC, we see no reason why it could not be finished within a year. This would also give manufacturers time to prepare for new labels. If, for legal or procedural reasons, such a phase-in is not possible, we would ask the FTC to provide a timetable so that testing and other needed work can be co-ordinated.

The Definition of Wetcleaning

As was discussed at the public meeting of January 29, the proposed definition of wetcleaning offered by FTC was inadequate only in that it did not mention specialized wetcleaning chemicals (which could be safely discharged to the environment) and the likely need for specialized finishing equipment in order to best serve the customer and the garment. As noted above, increased homewashing would help lessen perc usage (as well as any other hazardous solvents used in drycleaning); for wetcleaning to be required because its use could lead to a further reduction, it needs to be able to safely process a noticeably larger selection of garments than can be homewashed. Thus, the definition should include the chemistry and machinery not available or convenient to the average consumer.

As long as the FTC definition includes that, it would be an accurate summation of the state-of-the-art in wetcleaning. Some experienced professional cleaners may feel confident using a lesser level of technology, much as wetcleaners now feel confident using a technology that is not on the care label. However, the understanding between consumers and manufacturers that the care label engenders is based upon trust of a reasonable basis for care claims, and the most replicable tests are done on real-world machinery using actual chemistry. Greenpeace believes that a care label based on an amended FTC wetcleaning definition would help consumers care for their clothes and environment at the same time.

Preparing for the future

Finally, Greenpeace understands that this process has been slow and unwieldy because of the need to be evenhanded with a new technology when it will supplant entrenched business interests. With an eye toward new fabricare technologies on the horizon, some just finding their way into the commercial setting, we encourage the FTC to find a way to streamline and accelerate the proper labeling of these processes. Environmental Impact Studies are one good way to objectively prioritize the value of consumer technologies, as consumers are interested in such matters, but want the information to be as clear and accessible as possible.

Yours for a cleaner environment,



David M. DeRosa
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Greenpeace USA