FTC Seeking Comments on Creating a New ‘Professional Wet Cleaning’ Care Label

The United States Federal Trade Commission (FTC) is asking for public comments by September 6, 2011 on modifying the Care Label Rule to incorporate a ‘Professional Wet Cleaning’ care label.


Below are the FTC’s Questions specific to ‘Professional Wet Cleaning’ and STPP’s responses.

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| Why should the Commission modify the Care Label Rule to address the use of professional wet cleaning? | 2000: The Federal Trade Commission considered developing a ‘Professional Wet Cleaning’ care label:  
  - The EPA (Environmental Protection Agency) asked the FTC in 1998 to develop a ‘Professional Wet Cleaning’ care label because professional wet cleaning represented a viable pollution prevention alternative to dry cleaning with perchloroethylene (PCE), a chemical listed by the Clean Air Act as a hazardous air pollutant.  
  - After two years of deliberation, the FTC deferred moving forward until a standardized definition of professional wet cleaning was developed and a standardized methodology for testing was established.  
  
  2005-2007: ISO (International Standardization Organization) finalized a definition of professional wet cleaning, a professional wet cleaning care label instruction (including a symbol system), and developed standardized test procedures for professional wet cleaning.  
  Now that there is an internationally accepted standardized definition and methodology for testing, the FTC should move forward with developing the ‘Professional Wet Cleaning’ care label. |

| How should the Commission modify the Care Label Rule to address the use of professional wet cleaning? | The FTC must decide whether to allow the use of a ‘Professional Wet Cleaning’ care label, and if so, whether or not to require its use where appropriate.  
  - The FTC should adopt ISO’s definition, test procedures, and symbol system for professional wet cleaning.  
  - The FTC should require the use of the ‘Professional Wet Cleaning’ instruction where appropriate.  
  - While many countries have adopted the ISO ‘Professional Wet Cleaning’ care label, none have required its use. As a consequence, few garment manufacturers have voluntarily chosen to use the label.  
  - If the FTC allows but does not require the instruction, then many garments which could be professionally wet cleaned will continue to be labeled ‘Dry Clean’ or ‘Dry Clean Only.’ Such a labeling practice would be: (1) deceptive to customers by not providing information that professional wet cleaning is a viable option, (2) unfair to professional wet cleaners by misinforming existing and potentially new customers, and (3) unfair to professional wet cleaners by not providing them proper care instruction.  
  - As a federal agency, the FTC is responsible to guard against unfair and deceptive practices. In this case, the only way to assume fairness and accuracy is to require the ‘Professional Wet Cleaning’ label where appropriate. |

From American Drycleaner, a leading trade journal:

If the Federal Trade Commission (FTC) offers a ‘Professionally Wet Cleaning’ care label as an option for garment manufacturers, the pace of adoption will accelerate somewhat. If the FTC makes the instruction mandatory, then wet cleaning may indeed be the wave of the future.” (1999)