

The FRN included the following questions on this issue:

(7) Should the Commission amend the Rule to allow care symbols to be used in lieu of language in care instructions? If so, is there an existing set of care symbols that would provide all or most of the information required by the current Rule? What are the advantages and disadvantages of the existing systems of care symbols?

(a) In particular, what are the advantages and disadvantages of the system of care symbols developed by the International Association for Textile Care Labeling ("Ginetex") and adopted by the International Standards Organization as International Standard 3758?

(b) What are the advantages and disadvantages of the system of care symbols developed by the American Society for Testing and Materials ("ASTM") and designated as ASTM D5489 Guide to Care Symbols for Care Instructions on Consumer Textile Products?

III. Analysis of Comments

Eighty-one comments were received.¹ Sixty-five of the comments discussed the use of symbols in lieu of written language to communicate care instructions; 60 of those favored the use of symbols.² Five comments opposed

allowing symbols in lieu of written instructions.³ Most comments stated that they favored symbols because symbols would make international trade easier.

Canada and Mexico currently allow the use of symbols to convey garment care instructions. Many comments focused on trade with Mexico and Canada, stating or implying that symbols that harmonize with those used in Mexico and Canada would further the goals of NAFTA.⁴ Some of these comments stated or implied that, in addition to harmony with Canada and Mexico, whatever system is adopted should be in harmony with the symbol system used in Europe.⁵ Other comments placed more importance on harmony with the European system than with NAFTA.⁶

Some comments said there would be some initial cost to changing to a symbol system, but they either stated or implied that the long-run cost savings would exceed these initial "change-over" costs. Some comments explained in more detail why the current Rule impedes trade within North America. One comment stated that the requirement that care instructions be written makes for very long labels because it "forces manufacturers and retailers wanting to sell products freely

within the NAFTA territory to display care instructions in English, French and Spanish."⁷ Many other comments stated that the use of symbols would cause production costs to decline because the size of labels would be reduced and smaller labels are less expensive.⁸

Several comments noted that the use of symbols would help U.S. consumers who cannot speak English (or whose primary language is not English) and consumers who cannot read (or cannot read well).⁹ Some comments noted that smaller labels may improve consumer comfort.¹⁰ Other comments stated that smaller labels would also make garments more attractive.¹¹ Several comments stated that savings from smaller labels could be passed on to consumers as reductions in the cost of apparel.¹²

Many comments that favored the use of symbols emphasized that the symbols should not be mandatory, but a voluntary option, and that the use of written care instructions should continue to be allowed, either as a supplement to symbols or alone.¹³ Several comments noted that all possible care instructions cannot be conveyed by symbols; certain special handling instructions such as "remove promptly"; "double rinse for best results"; "wash inside out"; "wash with like garments"; or "wash before wearing" will probably have to be communicated in words.¹⁴ But one comment noted that "symbols alone could easily accommodate 75-80% of the merchandise sold."¹⁵

In sum, most of the comments state that the use of symbols would benefit both manufacturers, by lowering production costs and increasing exports, and consumers, by communicating care instructions clearly and by potentially

¹ The commenters included cleaners; consumers; public interest-related groups; fiber, textile, or apparel manufacturers or sellers (or conglomerates); federal government entities; fiber, textile, or apparel manufacturers or retailers trade associations; two label manufacturers; one cleaning products manufacturer; one association representing the leather apparel industry; one Committee formed by industry members from the countries signatory to NAFTA; one appliance technician; one appliance manufacturers trade association; two standards-setting organizations; and two representatives from foreign nations. Each comment was assigned a number. The first time a comment is cited it is cited by the full name of the commenter and the assigned number; subsequently, it is cited by the number and a shortened form of the name. The comments are available for inspection in the Public Reference Room, Room 130, Federal Trade Commission, 6th and Pennsylvania Ave., NW., Washington, DC, from 8:30 a.m. to 5:00 p.m., Monday through Friday, except federal holidays.

² These comments are: Benjamin Axleroad (1), Baby Togs, Inc. (2), Judith S. Barton (7), C.M. Offray & Son, Inc. (9), The Schwab Company (10), Fieldcrest Cannon (11), Ardis W. Koester (12), University of Kentucky College of Agriculture (15), ASTM Committee D-13 on Textiles (16), Pittsfield Weaving Co. (17), European Union (GATT Secretariat) (18), Todd Uniform, Inc. (19), Acqua Clean System (20), Woolrich, Inc. (21), The Massachusetts Toxics Use Reduction Institute (23), Carter's (24), Braham Norwick (25), Oshkosh B'Gosh, Inc. (27), Ecofranchising, Inc. (28), Consumers Union (31), Clorox Company (32), The Warren Featherbone Company (33), Industry Canada (37), Business Habits, Inc. (38), Clothing Manufacturers Association of the United States of America (40), National Association of Hosiery Manufacturers (41), Paxar Corporation (42), Jo Ann Pullen (44), The Warren Featherbone Company (46),

United States Apparel Industry Council (47), Dan River, Inc. (48), American Fiber Manufacturers Association, Inc. (49), The Leslie Fay Companies, Inc. (50), Springs Industries, Inc. (51), Salant Corporation (52), Association of Home Appliance Manufacturers (53), Milliken (54), Ruff Hewn (55), American Textile Manufacturers Institute (56), United States Association of Importers of Textiles and Apparel (57), Authentic Fitness Corporation (60), Warnaco (61), Salant Corporation (63), Fruit of the Loom (64), Drycleaners Environmental Legislative Fund (65), Angelica Corporation (66), Department of the Air Force (67), American Apparel Manufacturers Association (68), Trilateral Labeling Committee (69), J.C. Penney (70), Liz Claiborne, Inc. (71), Wemco, Inc. (72), Horace Small Apparel Company (74), Perry Manufacturing Company (75), Russell Corporation (76), Oxford Industries, Inc. (77), The GAP, Inc. (78), Haggar Apparel Company (79), Capital Mercury Shirt Corp. (80), Bidermann Industries (81).

³ Evelyn Borrow (4), Margaret Tilden (13), Capital Mercury Shirt Corp. (26), Ann Geerhart (29), and VF Corporation (36).

⁴ Togs (2) p.1; Offray (9) p.1; Fieldcrest (11) p.2; Koester (12) p.2; Pittsfield (17) pp. 2-3; Mass. Toxics Reduction (23) p.2; Carter's (24) p.1; Featherbone (33) p.2; Industry Canada (37) p.3; Paxar (42) p.1; Featherbone (46) p.1; USAIC (47) p.2; Dan River (48) p.1; AFMA (49) p.1; Salant (52) p.1; AHAM (53) p.2; Milliken (54) p.2; Ruff Hewn (55) p.2; ATMI (56) p.1; USA-ITA (57) p.3; Authentic Fitness (60) pp. 1-2; Warnaco (61) pp. 1-2; Salant (63) pp. 1-2; Fruit (64) p.2; Angelica (66) p.6; AAMA (68) p.1; Trilateral Committee (69) pp. 1-2; Wemco (72) p.1; Horace Small (74) p.1; Russell (76) p.2; Oxford (77) p.1; Haggar (79) p.1; Bidermann (81) p.1.

⁵ E.g., Fieldcrest (11) p.2; Pittsfield (17) p.3.

⁶ European Union (18) pp. 2-3; Leslie Fay (50) p.1; Gap (78) p.4. The Ginetex/ISO system is used in Europe.

⁷ Fruit (64) p.2.

⁸ Fieldcrest (11) p.2; Pittsfield (17) p.1; Mass. Toxics Reduction (23) p.2; Carter's (24) p.1; Norwick (25) p.1; Capital Shirt (26) p.1; Featherbone (33) p.2; VF Corp. (36) p.4; Industry Canada (37) p.2; Paxar (42) p.1; Pullen (44) p.4; USAIC (47) p.2; ATMI (56) p.3; USA-ITA (57) p.2; Salant (63) p.1; Fruit (64) p.2; Air Force (67) p.2; AAMA (68) p.2; Haggar (79) p.1.

⁹ Togs (2) p.1; Koester (12) p.2; Pittsfield (17) p.2; Norwick (25) p.1; Pullen (44) p.2.

¹⁰ A few comments mention that some labels are scratchy and irritate the skin. Axleroad (1) p.1; Borrow (4) p.1; Martin (8) p.1; Pittsfield (17) p.1; Featherbone (33) p.1; Salant (63) p.1; Capital Shirt (80) p.1.

¹¹ AAMA (68) p.2.

¹² Paxar (42) p.1, Fruit (64) p.2, Haggar (79) p.1.

¹³ Oshkosh (27) p.1; USAIC (47) p.2; Springs (51) p.1; ATMI (56) p.2; Salant (63) pp. 1-2; Fruit (64) p.2; Air Force (67) p.2; AAMA (68) p.3; Trilateral Committee (69) p.2; Penny (70) p.2.

¹⁴ Fieldcrest (11) p.3; Pittsfield (17) p.1; European Union (18) p.2, Woolrich (21) p.1, VF Corp. (36) p.4.

¹⁵ Penney (70) p.2.