



Clothes Captioning: Complying with the Care Labeling Rule

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Introduction

The Federal Trade Commission's (FTC) Care Labeling Rule requires manufacturers and importers to attach care instructions to garments. Updates to the Rule became effective on September 1, 2000. The Rule's section requiring a "reasonable basis" for care instructions has been changed to clarify what is required, and the definitions of "hot," "warm," and "cold" water have been changed to harmonize with the definitions used by the American Association of Textile Chemists and Colorists (AATCC).

Care labels often are a deciding factor when consumers shop for clothing. While some consumers look for the convenience of drycleaning, others prefer the economy of washable garments. In fact, recent surveys show that consumers want washing instructions. Some manufacturers try to reach both markets with garments that can be cleaned by either method. The Rule lets you provide more than one set of care instructions, if you have a reasonable basis for each instruction. Some manufacturers provide instructions for both methods but add, "For best results, dryclean." This tells consumers that the garment can be washed without damage, but drycleaning may be better for appearance and durability. If truthful and substantiated, care instructions like these are acceptable.

The FTC developed this guide to help you understand how to comply with the Care Labeling Rule. For information about other rules relating to the labeling of textile products for fiber content, country of origin and manufacturer identity, see the FTC publication, [Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts](#). Copies of Threading Your Way are available from the FTC's web site at <http://www.ftc.gov/> and also from the FTC's Consumer Response Center, Room 130, 600 Pennsylvania Avenue, NW, Washington, DC 20580, or by calling toll-free, 1-877-FTC-HELP (1-877-382-4357).

Complying with the Rule

The Care Labeling Rule requires manufacturers and importers to attach care instructions to clothing and some piece goods.

Who's Covered

Manufacturers and importers of textile wearing apparel.

Manufacturers and importers of piece goods sold to consumers for making wearing apparel.

Any person or organization that directs or controls the manufacturing or importing of textile wearing apparel or piece goods for making wearing apparel.

What's Covered

Textile apparel worn to cover or protect the body.

- **Exempt apparel:** shoes, gloves and hats.
- **Excluded items:**
 - Handkerchiefs, belts, suspenders and neckties because they do not cover or protect the body.
 - Non-woven garments made for one-time use because they do not require ordinary care.

Piece goods sold for making apparel at home.

- **Exempt piece goods:**
 - Marked manufacturers' remnants up to 10 yards when the fiber content is not known and cannot easily be determined
 - Trim up to 5 inches wide.

Instructions and Warnings

You must:

Provide complete instructions about regular care for the garment, or provide warnings if the garment cannot be cleaned without harm.

Ensure that care labeling instructions, if followed, will cause no substantial harm to the product.

Warn consumers about certain procedures that they may assume to be consistent with the instructions on the label, but that would harm the product. For example, if a pair of pants is labeled for washing, consumers may assume they can iron them. If the pants would be harmed by ironing, the label should read, "Do not iron."

Ensure that care labels remain attached and legible throughout the useful life of the product.

Reasonable Basis

You must have a reasonable basis for all care instructions, including warnings. That means you must have reliable evidence to support the care instructions. For example, you cannot say "Dryclean Only" unless you have proof that washing is harmful to the garment. What constitutes reliable evidence depends on several factors.

In some cases, experience and industry expertise can serve as a reasonable basis.

In other instances - for example, when a dye is used that is known to bleed or when beads that are known to be damaged often in drycleaning are used - test results showing that the garment can be cleaned as recommended without damage may be required.

When a garment contains several components, you must have reliable evidence showing that the garment as a whole will not be damaged when cleaned as directed. The updated Rule clarifies that results of tests on components of garments can serve as a reasonable basis as long as you have reliable evidence supporting the care instructions for the garment as a whole. For example, testing the components of a garment is not an adequate basis for a "wash" instruction if the color of one part bleeds onto another when the finished garment is washed.

When to Label Garments

Domestic manufacturers must attach care labels to finished products before they sell them.

Importers must ensure that care labels are attached to products before they sell them in the United States, but care labels don't have to be attached to products when they enter the United States.

Labeling Clothing

Labels must be attached so they can be seen or easily found by consumers at the point of sale.

If labels can't be seen easily because of packaging, additional care information must appear on the outside of the package or on a hang tag attached to the product.

Labels must be attached permanently and securely and be legible during the useful life of the product.

A garment that consists of two or more parts and is always sold as a unit needs only one care label if the care instructions are the same for all the pieces. The label should be attached to the major piece of the suit. If the suit pieces require different care instructions or are designed to be sold separately, like coordinates, then each item must have its own care label.

Labeling Piece Goods

Manufacturers and importers must provide care information clearly and conspicuously on the end of each roll or bolt of fabric. The information should apply to the fabric on the roll or bolt, not to the items the consumer might add to the fabric, such as trim, lining or buttons.

Exemptions

The following items don't need permanent care labels, but must have conspicuous temporary labels at the point of sale:

Totally reversible clothing without pockets.

Products that may be washed, bleached, dried, ironed, and drycleaned by the harshest procedures available, as long as the instruction, "Wash or dryclean, any normal method," appears on a temporary label.

Products that have been granted exemptions on grounds that care labels will harm their appearance or usefulness. You must apply for this exemption in writing to the Secretary of the

FTC. Your request must include a labeled sample of the product and a full statement explaining why the request should be granted.

The following items don't need care instructions:

Products sold to institutional buyers for commercial use. For example, uniforms sold to employers for employee use in job-related activities, but not purchased by the employees.

Garments custom-made of material provided by the consumer.

Products granted exemptions under Section (c)(2) of the original rule because they were completely washable and sold at retail for \$3 or less. If the product no longer meets this standard, the exemption is automatically revoked.

Violations

Failure to provide reliable care instructions and warnings for the useful life of an item is a violation of the Federal Trade Commission Act. Violators are subject to enforcement actions and penalties of up to \$11,000 for each offense. In enforcement actions, the FTC contends that each mislabeled garment is a violation. Since 1990, the FTC has brought 16 enforcement actions, one of which was litigated and 15 of which were resolved by settlements. Penalties have ranged as high as \$300,000.

Writing Care Instructions

Labels for clothing must have a washing instruction or a drycleaning instruction. If the item can be washed and drycleaned, the label needs only one of these instructions. However, you may want to consider that consumers like having washing instructions for items that can be washed. If you prefer, you can give instructions for both washing and drycleaning.

Sometimes, because of the particular combination of components, a garment can neither be safely washed nor drycleaned, but the manufacturer nevertheless wishes to market it. The label on such a garment must say "Do not wash - Do not dryclean."

We recommend, but don't require, that the terms defined in the Rule's glossary be used when applicable.

The care symbols from the American Society for Testing and Materials (ASTM) designated as ASTM Standard D5489-96c, Standard Guide for Care Symbols for Care Instructions on Textile Products, may be used in place of words, but the symbols must fulfill the requirements of the Rule. These symbols are also very similar but not identical to the symbols designated as an international standard by the International Standards Organization (ISO) that are used in many European countries. Only the ASTM symbols have been approved for use in the United States. The system used in Europe does not provide symbols for all the information required by the Care Labeling Rule. The U.S. representatives to the ISO are working to add the necessary symbols to the international standard and to harmonize the international standard with the ASTM standard.

Washing Instructions: Five Elements

One: Washing by hand or by machine

The label must say whether the product should be washed by hand or machine. The label also must give a water temperature setting if regular use of hot water will harm the product.

Two: Bleaching

If all commercially available bleaches can be used on a regular basis without harming the product, the label does not have to mention bleach.

If using chlorine bleach on a regular basis would harm the product, but using non-chlorine bleach on a regular basis would not, the label must say, "Only non-chlorine bleach, when needed."

If all commercially available bleaches would harm the product when used on a regular basis, the label must say "No bleach" or "Do not bleach."

Three: Drying

The label must say whether the product should be dried by machine or some other method. Unless regular use of high temperature will harm the product when machine dried, it is not necessary to indicate a temperature setting.

Four: Ironing

Ironing information must be given on a care label if ironing will be needed on a regular basis. If regular use of a hot iron will not harm a product, it is not necessary to indicate a temperature setting.

Five: Warnings

If the consumer reasonably could be expected to use a care procedure that would harm the product, the label must contain a warning like "Do not," "No," "Only," to warn against the harmful procedure. For example, if a garment will be harmed by ironing, even if ironing is not regularly needed, the label should state "Do not iron" if the customer can be expected to "touch up" the garment occasionally.

If a care procedure on one product could cause harm to another product being washed with it, a warning must be included. For example, if an item is not colorfast, the label must say, "Wash with like colors" or "Wash separately."

Warnings are not necessary for alternative procedures that could be harmful. For example, if the instructions state, "Dry flat," it's not necessary to state, "Do not tumble dry."

Drycleaning Instructions

A simple "dryclean" instruction may be used under two conditions. First, if all commercially available types of solvent can be used, the label doesn't have to mention any particular type of solvent. If one or more solvents would harm the product, however, a safe solvent must be mentioned. (For example, "Dryclean, petroleum solvent.") Second, a simple "dryclean" may be used if the drycleaning process, as defined in the Rule, can be used on the garment with no modifications. If any part of the drycleaning process would harm the product, the "dryclean" instruction must include a warning to avoid or modify that part of the process. "Do not," "No," "Only," or other clear wording must be used. For example, if steam would damage a garment, the label should say, "Dryclean. No steam." In this situation, where a modification must be made to the normal drycleaning process, you may, if you wish, say, "Professionally dryclean. No steam." But "Professionally dryclean" should not be used where there is no need to modify the normal drycleaning process, and it should only be used with the instructions for modifying the process. (E.g., "Professionally dryclean. No steam.") By itself, "Professionally dryclean" is not an adequate instruction.

Remember that "Dryclean Only" is a warning that the garment cannot be washed. For any warning on the label, you must have evidence that the process warned against will damage the garment. You may label garments "Dryclean Only," but only if you have evidence that washing will damage the garment.

Frequently Asked Questions

Label Location

Q. May care instructions be put on the back of another permanent label sewn into the garment?

A. If only one end of a permanent label is sewn into the garment and the front and back of the label are readily accessible to the consumer, care information may appear on the reverse side. The front of the label doesn't have to say "Care on reverse."

Q. Does each piece of an ensemble, suit or other multi-piece garment need a care label?

A. A garment that consists of two or more parts and is always sold as a unit needs only one care label if the care instructions are the same for all the pieces. The label should be attached to the major piece of the suit. If the suit pieces require different care instructions or are designed to be sold separately, like coordinates, then each item must have its own care label.

Q. May I print care instructions directly on the product?

A. Yes, if the instructions meet the Rule's requirements of permanence and legibility.

Q. May I print care instructions on the "fiber content" label?

A. Yes, if the instructions meet the Rule's requirements of permanence and legibility.

Label Content

Q. What's the minimum washing instruction that can appear on a care label?

A. At a minimum, a washing instruction would include a method of washing and a method of drying, like "Machine wash. Tumble dry." This minimal wording, however, means that the product can be machine washed and tumble dried at any temperature, that ironing isn't necessary, that any type of bleach can be used, and that no warnings are required. Thus, all elements of a proper washing instruction would have to be considered - washing, drying, ironing, bleaching and warnings.

Q. Generally, when wash-and-wear garments are removed promptly from the dryer, they don't need ironing. But if the garments aren't removed promptly, they will wrinkle and require some pressing with a cool iron. Must a care instruction say something about this?

A. Yes. The Rule requires ironing instructions if ironing is needed on a regular basis to preserve the appearance of the product or as a special warning when a consumer can be expected to use an iron and using a hot iron would harm the product. In these cases, it is reasonable to expect some consumers to use an iron. Therefore, the instruction could read "Cool iron, if needed." This indicates that ironing is not always needed, but if an iron is used, it should be set at the lowest temperature setting.

Q. Is it proper if the bleach portion of a washing instruction says, "Do not use chlorine bleach"?

A. No. A care label that contains only the words "Do not use chlorine bleach" is unacceptable. If using chlorine bleach on a regular basis would harm the product, but using non-chlorine bleach on a regular basis would not, the label must say, "Only non-chlorine bleach, when needed." This instruction is designed to warn consumers that chlorine bleach is not safe, but non-chlorine bleach is safe for regular use. For more clarity, the care label may say "Only non-chlorine bleach, when needed. Do not use chlorine bleach."

Q. Would a care label that says "Wash in warm water. Block to dry. Do not use bleach" be permitted under the Rule?

A. No. This instruction is not complete, even if no other warnings are required and ironing is not necessary. The Rule requires washing instructions to state whether the products should be washed by hand or machine.

Q. Must a care instruction take into consideration such things as linings, trim, buttons or zippers?

A. Yes. Care instructions must include all components of the product, including non-detachable linings, trim and other details. Any special considerations for such components should be contained in the instruction as a warning, for example, "Remove trim," or "Close zipper." A detachable component, such as a slip out liner, must be separately labeled when it requires a different care procedure than the main product.

Q. When may "Dryclean only" be used?

A. "Dryclean only" may be used when the garment can be safely drycleaned by the normal process, using any drycleaning solvent. The instruction indicates that the garment can't be safely washed. When "Dryclean only" is used, there must be a reasonable basis for both the drycleaning instruction and the warning against washing.

Q. Is the single word "Dryclean" a sufficient care instruction?

A. Yes. While a drycleaning instruction generally must include a type of solvent that can be used safely (say, perchlorethylene or petroleum), if any type of commercially available solvent can be used, it is not necessary to name a type of solvent that can be used. A care instruction with only the word "Dryclean" means that any solvent may be used safely in a process that includes machine cleaning, moisture addition to solvent of up to 75% relative humidity, hot tumble drying up to 160 degrees Fahrenheit, and restoration by steam press or steam-air finishing.

Q. When should "Professionally dryclean" be used?

A. "Professionally dryclean" should be used when the normal drycleaning process must be modified to safely dryclean the product. However, by itself, "Professionally dryclean" is not an adequate instruction. It must be accompanied by the modification(s) necessary to make the drycleaning process safe. For example, "Professionally dryclean, reduce moisture, short cycle, tumble warm, no steam" would mean that any commercially available solvent could be used, the moisture addition to the solvent should be reduced, the cleaning time should be reduced, the warm setting should be used for tumble drying, and steam should not be used in pressing or finishing.

Care Symbols

Q. Must I use symbols?

A. No. Symbols are optional as long as there are care instructions on the label. If you choose, however, you may use symbols without words, but, if you do, you might want to include information about the meaning of the symbols (for example, on a hangtag or in your catalogue) to be sure your customers understand them.

Q. May I use the system of symbols used in Europe and designated as an international standard by the International Standards Organization (ISO)?

A. No. The symbols you use must be those developed by the ASTM and designated as ASTM Standard D5489-96c. The system used in Europe does not provide symbols for all the information required by the Care Labeling Rule.

Labeling Piece Goods

Q. What does "certain piece goods" mean?

A. Under the Rule, certain piece goods are fabrics sold at retail on a piece-by-piece basis from bolts, pieces or rolls for use in home sewing of textile wearing apparel. The term "fabric" means any material woven, knitted, felted, or otherwise produced from, or in combination with, any natural or manufactured fiber, yarn or substitute.

Two categories of piece goods are excluded from the Rule:

Trim up to 5 inches wide, such as ribbon, lace, rick-rack, tape, belting, binding, or braid; and
Manufacturer's remnants up to 10 yards long when the remnants are clearly and conspicuously marked as "pound goods" or "fabric of undetermined origin," and the fiber content of the remnants is unknown and can't be readily determined. If the remnant's fiber content is known, it's not excluded. Remnants created at the retail level, or by the manufacturer at the request of the retailer, are not excluded either.

Q. Manufacturers and importers must put care information for piece goods "on the end of each bolt or roll." Is there any specific location for this information?

A. Care information may be placed on the selvage of the material, on the end of the "board" on which the goods are wound, on a tag attached to the selvage or the "board end," or on any other position at the end of the roll where the information can be found easily and read by a consumer. If a tag is used, it should be attached so that it will not separate from the bolt until the last piece is sold.

Exemptions to the Rule

Q. The Rule exempts products sold to institutional buyers for commercial use. Does this include rental service companies?

A. Yes. Other institutional buyers include: hospitals; nursing homes; colleges and universities; local, state, and federal institutions; hotels; motels; and other bulk purchasers of uniforms and employee work clothes.

Q. Is there any exemption that applies to a whole product line?

A. The only product line exemption applies to hosiery, including stockings, anklets, waist-high tights, panty hose, and leg warmers. While hosiery items don't need a permanent care label, they must have care instructions on a hang tag, on the package, or in another conspicuous place. This includes sheer hosiery (50 denier or less). However, hosiery that retails for \$3 or less and can be washed and dried at hot settings without damage doesn't need a label.

Drycleaners

Q. Must a drycleaner clean a garment according to the instructions on the care label?

A. No, but using a care method not specified on a care label may be risky. Clothing labeled as washable may - or may not - dryclean satisfactorily. Many local drycleaners have facilities for properly washing

and finishing washable garments, but customers who request a method of cleaning not listed on the care label may be asked to sign a consent form. The form explains that the drycleaner and the customer have discussed the potential risks of cleaning the garment. With or without the consent form, when drycleaners accept garments for cleaning, they are obligated to clean garments professionally, to the best of their ability.

"Professionally Wetclean"

Q. Does a care label that states "Professionally wetclean" comply with the Care Labeling Rule?

A. No. The subject was of considerable interest during the amendment proceedings, and is discussed at length in the Care Labeling Rule Statement of Basis and Purpose, published in the Federal Register on August 2, 2000, and available in the Care Labeling section on the Textile, Wool, Fur and Apparel page on www.ftc.gov/os/statutes/textilejump.htm.

Here's a brief explanation of the Commission's reasons for not allowing a "Professionally wetclean" instruction now:

The Commission believes that a final definition of "professional wetcleaning" and an appropriate test method for the process must be developed before the Commission can amend the Rule to permit a "Professionally wetclean" instruction on required care labels. This is necessary in order to give manufacturers clear guidance as to how they may establish a reasonable basis for a wetclean instruction. Currently, manufacturers can test garments for drycleaning by having them drycleaned in perchloroethylene or another commercially available drycleaning solvent. They can test for home washing by laundering them at various water temperatures. In order to have a reasonable basis for a "Professionally wetclean" instruction, manufacturers would need to be able to subject the garments to such a cleaning method. In this case, however, the "method" may encompass many different processes, and the one chosen would depend in large part on the particular cleaner. In recommending a particular cleaning method, manufacturers must have assurance that the method they are recommending - and for which they have established a reasonable basis - is the same method that cleaners actually would use to clean the garment labeled for that method. For this reason, a definition of "professional wetcleaning," for purposes of amending the Care Labeling Rule, must either describe all important variables in the process, so that manufacturers could determine that their garments would not be damaged by the process, or be coupled with a specific test procedure that manufacturers could use to establish a reasonable basis.

In short, the Commission concluded "that some level of standardization is necessary before a 'Professionally wetclean' instruction can be placed on garments that are to be sold throughout the entire country." The Commission noted, however, that it was "encouraged by the fact that, during the year since the workshop took place, standards-setting organizations and other interested participants in this proceeding appear to have been working independently to resolve these outstanding issues."

For More Information

The FTC works for the consumer to prevent fraudulent, deceptive, and unfair practices in the marketplace and to provide information to businesses to help them comply with the law. To file a [complaint](#) or to get [free information on consumer issues](#), visit ftc.gov or call toll-free, 1-877-FTC-HELP (1-877-382-4357); TTY: 1-866-653-4261. The FTC enters Internet, telemarketing, identity theft, and other fraud-related complaints into [Consumer Sentinel](#), a secure online database available to hundreds of civil and criminal law enforcement agencies in the U.S. and abroad.

Your Opportunity to Comment

The National Small Business Ombudsman and 10 Regional Fairness Boards collect comments from small businesses about federal compliance and enforcement activities. Each year, the Ombudsman evaluates the conduct of these activities and rates each agency's responsiveness to small businesses. Small businesses can comment to the Ombudsman without fear of reprisal. To comment, call toll-free 1-888-REGFAIR (1-888-734-3247) or go to www.sba.gov/ombudsman.