

REGULATION IMPACT STATEMENT



CONSUMER PRODUCT INFORMATION STANDARD FOR CARE LABELLING OF CLOTHING AND TEXTILE PRODUCTS UNDER THE TRADE PRACTICES ACT 1974

MARCH 2010

Australian Competition & Consumer Commission

INTRODUCTION

The mandatory national standard for care labelling has been in place for 31 years. It was first introduced by Gazette Notice on 13 February 1979 based on AS 1957-1978 and has undergone review and amendment in 1989, 1997, 1998 and most recently in 2003. The most substantial review of the mandatory care labelling standard was completed and a report released in June 1997.

The 1997 review concluded that there was a case to continue the care labelling regulation on the grounds that there was sufficient doubt that suppliers would continue to provide care labelling information on a voluntary basis and that abandoning the care labelling standard had the potential to adversely affect dry cleaning businesses.

Dry cleaners were concerned that in the absence of a mandatory standard, garments would not carry care labelling instructions resulting in an increase in the level of damage claims from customers due to dry cleaners attempting to dry clean garments without suitable dry cleaning instructions, as well as a loss of customers to dry cleaners as a result of people laundering garments more suitable for dry cleaning at home.

The 1998 review updated the mandatory standard to reference the then recently revised *AS/NZS 1957:1998 Textile – Care labelling* and attempted to address concerns that the standard was too prescriptive. The 1998 review also considered but ultimately rejected amending the mandatory regulation to allow the use of symbols only in care labels due to industry concerns that based on experience in Europe, UK and US, care symbols were not well understood by consumers.

The mandatory standard was last amended on 12 December 2003 to add some words to Clause 3.6 Care labelling phrases and symbols and to remove the sunset clause from the standard. A Regulation Impact Statement was not required for the 2003 amendments due to the minor nature of the changes and the absence of complaints or requests for modifications to the mandatory standard.

The current consumer product safety information standard for *Care labelling of clothing and textile products* (the standard) came into effect from 1 January 2004. The standard is based Australian Standard AS/NZS 1957:1998 as varied by Consumer Protection Notice No. 16 of 2003.

The standard covers a variety of items from clothing; household textiles, furnishings; piece goods made from textiles, plastic coated fabrics; suede skins, leathers and furs. In general, the standard requires that care instructions be:

- permanently attached to articles,
- written in English,
- legible,
- appropriate and adequate for the care of the article so that when followed the article is not damaged, and
- accessible at the point of sale.

Care labelling regulations mirroring the Commonwealth regulations apply at the state level in NSW, Queensland, South Australia and Western Australia. From 2011 the standard will apply in all States and Territories.

THE PROBLEM

The problem being addressed

The rapid development and introduction of innovative synthetic textiles into the market in the 1960's and 1970's meant that garment carers' familiarity with and knowledge of how to care for new fibres was often flawed or non-existent. This led to damage of garments through shrinkage, melting and running of colours through inappropriate care and cleaning methods by consumers and dry cleaners.

It is likely that incorrect care of garments and textiles caused considerable damage to clothes and textiles prior to the introduction of the mandatory standard in 1979 but statistics are not available on the extent or nature of the damage.

Changes in the market

There is now widespread availability and access to quality textile care information from detergent manufacturers' help-lines and a variety of websites providing guidance on care and maintenance of fabrics. However continuing innovation in fibre and clothing design, the use of multiple fibres and trims, lack of universal access to the internet, and lack of immediacy of information when clothes are being washed or dry cleaned are all factors which support the continuing need for care labelling to be provided with clothing and textiles.

Consultation with stakeholders suggests that labelling of fibre content alone is not sufficient to provide dry cleaners and consumers with the information required to assess the appropriate manner for cleaning or maintaining all garments and textiles. The manufacturer is best positioned to determine those requirements, with regard to other relevant factors such as the garment's textile composition, components, finishes, trims and fastenings, which a consumer or dry cleaner may accidentally overlook or not take into account from lack of direct knowledge.

Information collected from ACCC complaint records over a 14 year period suggests there is now little damage to clothing and textiles in Australia. Responses to the review from suppliers and dry cleaners as well as the low consumer complaint levels provide a reasonable indication that the mandatory provision of care instructions is effective from a consumer and business perspective.

OBJECTIVE

The basis for review of the mandatory Consumer Product Information Standard for care labelling of clothing and textile products is to examine whether government intervention in the market continues to be justified and if so, then to ensure the standard is up to date, relevant and continues to address the problem or a market failure leading to its introduction.

What is the purpose of the mandatory standard?

The objective of the consumer product information standard for care labelling is to prevent damage to clothing and textiles caused through inappropriate treatments, to enable textile products to be properly maintained, for the useful life of a product to be extended, to enable consumers to be fully informed about the potential maintenance costs of textile products at the point of purchase and to inform dry cleaners and launderers of appropriate cleaning methods to be applied to the garments.

IDENTIFICATION OF OPTIONS

The options for achieving the objective for consideration are:

1. Self regulation – repeal Commonwealth care labelling regulation

Industry self-regulation is voluntary action by industry meaning suppliers would provide care labelling instructions on a voluntary basis only. Suppliers could choose to discontinue the provision of care labels, or use symbols, in accordance with some international practices.

This option removes the trade barrier to overseas suppliers and increases the level of competition in the clothing and textile industry in the Australian market and the range of garments and textiles for consumers

2. Amend existing regulation to allow ‘adequate care instructions’

A new consumer product information standard would be declared for care labelling of textile products. The new standard would not make mandatory the requirements of AS/NZS 1957:1998 but would require ‘adequate care instructions’ that were:

- written in English,
- legible,
- appropriate and adequate for the care of the article so that when followed the article is not damaged,
- permanently attached to articles, and
- accessible at the point of sale.

The new standard would refer to care labelling standards only as a way to provide guidance on what might be considered ‘adequate care instructions’. This option would provide greater scope for the provision of information by way of non-prescriptive laundering or dry cleaning instructions. Garment suppliers could choose to print information directly onto garment, or label only one of a two piece set whereas at present each piece must be separately labelled, sometimes detracting from the appearance of garments. While in most other ways this option is comparable to option 4 maintaining the status quo, an important difference is that option 4 provides more certainty as to what is permitted while option 2 gives more scope but less certainty about what is considered adequate.

This option removes some of the trade barrier to overseas suppliers.

3. Require no care labelling, but regulate fibre content labelling

Fibre content labelling would become mandatory nationally. Fibre content labelling is currently mandatory in some states and territories and in Canada, Japan, and India and European Community member countries. Suppliers would provide care labelling on a voluntary basis only.

This approach may be more consistent with a hazard focussed Product Safety approach as it would enable consumers to avoid garments and textiles that may prove irritating to the skin or provoke allergic reactions. Fibre content may also be more indicative of the flammability or fire retardant properties of a fabric.

4. Maintain status quo

The consumer product safety information standard for *Care labelling of clothing and textile products* would continue to be based on Australian Standard AS/NZS 1957:1998 with minor variations.

IMPACT ANALYSIS

International standards

The Commonwealth Government has obligations to ensure that its regulations do not impose unnecessary barriers to trade by setting standards that make compliance by overseas manufacturers difficult. International parity in product standards where possible is an important policy objective.

New Zealand has adopted Australian Standard 1957-1998 as a mandatory standard aligning with the current Australian care labelling requirements.

In the United States a mandatory care labelling requirement has been in place since 1971. Since 1 July 1997, textile manufacturers have been permitted to use specified care symbols in place of written instructions on permanent labels inside garments to indicate a method for properly cleaning them. The Federal Trade Commission (FTC) required manufacturers to include written information explaining what the symbols mean in swing-tags or elsewhere within the garments for the first 18 months that new symbols were in use. The symbols used are those developed by the American Society of Testing and Materials (ASTM). There must be a reasonable basis for each instruction.

The revised Chinese Textile - Care Labelling Code Using symbols (GB/T 8685-2008) took effect on March 1, 2009. The revisions to this standard brought it into alignment with the international care label standard ISO 3758. GB/T 8685-2008 is one of the recommended standards cited by GB 5296.4 'Instructions for use of products of consumer interest - Part 4: Textile and apparel', which is a compulsory standard in China.

The Japanese Industrial Standard for Care Labelling requires use of symbols for washing, chlorine bleaching, ironing, dry-cleaning, wringing and drying in that order. The symbols vary from those used in the US and Europe.

In Canada, care labelling, presented as either symbols or written words, is voluntary but if provided any symbols used must be based on the National Standard of Canada, 'Care Labelling of Textiles' and if used must be in compliance with the Canadian Care Labelling

Program under the Textile Labelling Act. The semi-voluntary system is administered by the government.

Europe has no mandatory requirements for care labelling of textile products. There is, however, a voluntary code of conduct which encourages industry to use the International Organisation for Standardisation (ISO) symbols for care labelling purposes.

Countries including Canada, India and European Community member countries have mandated fibre content labelling as an alternative to mandatory care labelling requirement, as it is viewed that knowledge of fibre content indicates appropriate care treatment.

In Japan fibre content labelling is mandatory under the Textile Labelling Act and recent changes to the regulation this year have introduced two generic variants to be permitted to be used to categorize a number of textiles with similar properties for increased flexibility.

None of the options available and considered in this regulation impact statement will achieve international parity in care labelling given the diversity of care labelling schemes prevailing worldwide.

Impact groups

The options considered in this review potentially impact on a significant portion of the adult Australian population. The outcome of the review will affect consumers who use care instructions in deciding on appropriate ways to launder, clean and dry clean their clothing and textile products, businesses involved in the supply of clothing and textile products (manufacturers, hirers, importers, distributors and retailers), and the dry cleaning industry who use the information contained on care labels when providing consumers with dry cleaning and laundering services and textiles testing laboratories. Government, including consumer product regulators and the Defence Department and other uniformed agencies are also impacted by the outcome of the review.

If mandatory care labelling is discontinued there is likely to be a cost to retailers, dry cleaners manufacturers and consumer protection agencies, including the ACCC in increased disputes arising from damage caused to items through use of inappropriate care procedures. While consumers will be affected by increased garment damage and reduced ability to apportion blame and claim damages, the greatest potential for hardship would be faced by consumers from disadvantaged groups, dry cleaners and other smaller retailers.

Consumers

In a deregulated market consumers may suffer considerable loss due to damage caused to garments by inappropriate cleaning methods when suppliers choose not to provide care labelling. While the review was not able to ascertain or even estimate these costs, anecdotal evidence suggests that damage to garments through inappropriate cleaning was widespread prior to the introduction of the mandatory regulation in 1979.

In a deregulated market while consumers could to some extent choose to purchase only labelled garments their choice of garments may then be restricted.

In a deregulated market consumers may have a wider and negligibly cheaper range of unlabelled clothing to choose from than currently exists but they will be required to spend time, effort and utilise knowledge and access resources, which they may not have, such as the internet, to identify the cleaning methods to apply to each unlabelled garment and

decide if they are accurate or appropriate and bear the risk and cost of damage to garments and textiles from the application of inappropriate cleaning methods.

In an 'adequate care labelling' regime consumers may have access to a greater variety of garments produced principally for other markets with different labelling requirements as relabelling will no longer be required to comply with unique Australian regulations. Elimination of compliance costs, albeit possibly marginal for the larger manufacturers, should flow to consumers in the form of reduced prices.

In an 'adequate care labelling' regime consumers may be presented with reduced or variable levels of information, which may lead to inappropriate care of garments causing damage. Consumers will not be able to expect the content of the information and instructions to be presented in a consistent manner, which may result in confusion and misinterpretation as individual manufacturers apply their own value judgments about what may be considered to be reasonably 'adequate' and 'appropriate'.

The expectation that consumers will continue to demand care labelling regardless of regulation is based on the premise that the consumer is informed, discriminating and has the choice to take their business elsewhere, which is not always the case.

In a fibre content only regime the costs to consumers include the inconvenience of learning which laundering methods are appropriate for specific fibres. This information is unlikely to be available at point of sale. This may in turn reduce the consumer's ability to make an informed purchasing choice when they are faced with an unfamiliar fibre.

Knowledge of fibre content only may be an insufficient indicator of appropriate care required for particular garments, especially where innovative fibres are used, or regard is to be had for a garment's construction, e.g. pleating, or trims and finishes, where the care instructions may differ from that of the fibre in the garment. The use of multiple fibres may provide a complication for the average consumer which they are unable to resolve. A fibre content label alone does not provide information on all elements of an item which may impact on the way it is to be laundered and maintained, for example whether:

- it must be washed separately to prevent damage to adjacent garments from a particular dye which may run, such as in blue denim used for jeans,
- buttons or other accessories can withstand drycleaning,
- a fibre has a treatment that will be harmed by either washing or drycleaning,
- the fabric type, e.g. wool crepe, may be severely affected by water, notwithstanding the fibre, 'wool' is usually washable, and
- prints are water soluble and cannot be washed but are safely drycleaned.

Currently some dry cleaners are reluctant to service garments without appropriate care labelling and there may be increasing numbers of instances where this situation may occur where no instructions or fibre content only labels are available. Dry cleaners would need to adapt to the market conditions as are currently prevalent in the US, EU and Canada where mandatory care labelling is not required, or deflect liability to the consumer.

There may be an increase in the number and complexity of disputes between consumers and suppliers arising from damage to garments and textiles from inappropriate care where

care instructions, which are no longer defined, are inadequate, inappropriate or subjectively interpreted.

The regulation currently in place potentially encourages a comprehensive, predictable and consistent level of labelling for consumers, reducing the need to interpret symbols or fibre content information and decreasing the likelihood of damaging clothes and textiles in the home laundering or dry cleaning processes. Consumers have appropriate information presented conveniently in a predictable format which enables them to protect their purchases and extend their useful life.

Mandated care labelling provides a system facilitating dispute resolution for consumers with suppliers and dry cleaners.

The US FTC *Facts for Business* publication notes that ‘recent surveys show that consumers want washing instructions’¹.

Garment and Textile Suppliers

Deregulation would mean the garment supply industry would not be required to provide labels at all, or if it chose to do so, would have a range of international labelling standards to choose from. Compliance costs would be eliminated. Where labels are provided voluntarily, this may give suppliers a competitive edge over rivals who do not provide care labels. Deregulation could provide opportunities for more innovative behaviour in labelling, e.g. providing the information in such a way that does not detract from the appearance or comfort of a garment.

In an ‘adequate care labelling’ regime the complexity and therefore costs of compliance for garment suppliers might be reduced and available care labelling options increase and become less prescriptive. This option would still facilitate an increase in overseas imports as some suppliers would not need to label specifically for the Australian market. Consultation with suppliers suggests that suppliers would experience some confusion about what labelling was adequate and when it became inadequate. One supplier stated that:

Adequate care would be difficult to control by retailers with their own standards and specifications. If a manufacturer is allowed to decide what is ‘adequate’ it may contradict the standards of the retailer. Once again symbols are not enough on their own as these vary from country to country. The basic principles of English, legible, attached and accessible must stay in place but care should also remain mandatory.

The option for fibre content labelling would be likely to be cost neutral for garment suppliers as it would replace care labelling.

Maintaining the status quo would mean the costs of compliance to industry would remain as they are currently. Suppliers can continue to benefit from this regime as the standard is largely unambiguous and can be clearly applied, facilitating compliance. Compliance costs are low according to respondents to the review advising that the cost of applying labels is around 1 to 2 cents per label.

The high volume of imported apparel product, approximately 1 billion units to Australia annually² could suggest that overseas manufacturers or importers do not find the Australian

¹ *FTC Facts For Business* <http://www.ftc.gov/bcp/edu/pubs/business/textile/bus50.shtm>

regulations a barrier to entry. Care labelling requirements are not uniform internationally and manufacturers who trade on the international market already adapt production to cater for a number of individual countries' or regions' requirements.

In addition, the regulation does not afford artificial protection to the local textiles and fashion industry which occupies a less favourable competitive position on price and range relative to overseas traders.

Dry cleaners

Previous reviews have raised concerns that dry cleaners may suffer serious detriment as a result of damages claims if care labelling is not regulated. Dry cleaners currently advise that an inordinate amount of time would be taken up by attempting to resolve disputes in the scenario where care labelling is not regulated.

In the absence of a care label, the entire burden of risk of damage to garments caused by improper treatment is transferred from the manufacturer to the dry cleaner or the consumer which is inconsistent with the principle that goods supplied should be 'fit for purpose'.

Dry cleaners have advised that because of the range of garments textile composition, components, finishes, trims and fastenings in many cases it is not possible to safely rely on fibre content labelling alone to ascertain appropriate cleaning methods for garments.

If the application of market forces results in demand continuing for care labelling of clothing and textiles, costs to the dry cleaning industry as a result of deregulation may be limited to having to learn to interpret non-prescriptive care information.

Dry cleaners may experience some loss of dry cleaning businesses where labelling of garments as 'dry clean only' by suppliers is discontinued, or consumers attempt to launder clothes at home.

If the status quo is maintained dry cleaners continue to benefit from the reduced likelihood of damage to clothes being sustained in the dry cleaning and laundering process and therefore reduced costs associated with liability and damage from inappropriate methods used and dispute resolution.

Governments

In a deregulated regime the markets would be left to deal with the issues around care labelling thereby freeing government resources to be directed towards reducing consumer exposure to hazardous products. However, the possibility exists for the ACCC or State and Territory resources to be diverted instead to dispute resolution, which may be effectively more time consuming or costly than the administration of the mandatory standard. The impost on the resources of government from increased complaint numbers anticipated and arbitrating disputes between suppliers and consumers compared to the cost of administering the regulation is expected to be significant.

The adoption of a non-prescriptive, less complex care labelling requirement might facilitate compliance with the regulation but could also make enforcement of non compliance more difficult due to the ambiguities of the less prescriptive regulation. Providing industry with

² Textiles and Fashion Industry Association (TFIA) figures 2009.

guidance on what labelling is considered acceptable may be more time consuming than currently, resulting in additional administration costs.

In maintaining the status quo government may derive a benefit from the regulation from reduced involvement in the resolution of disputes between consumers and business. The costs to government for the continued administration of the standard would remain as they are currently.

Environmental impact

The National Responsible Business Practice Project was commissioned by the Australian Federal Government in 2007 to explore enhancing sustainability through responsible business practices in the supply chain for specified products, including garments.

On Friday 29 January 2010 in Melbourne 32 stakeholders across the garment industry representing business, industry, government and NGOs discussed the findings and recommendations of the Travelling textiles report produced for the project by the Brotherhood of St Laurence. The report provides a roadmap for garment products and identifies the sustainability impacts for industry and society for each stage of the garment's life cycle.³

Whilst the report does not address the impact of care labelling in detail, it does illuminate that care labelling can be a mechanism for minimising the negative environmental impacts of garment damage and subsequent landfill waste by providing instructions for efficiently caring for and maintaining garments.

CONSULTATION

Comments on the draft RIS October 2009 were invited from a broad range of sectors representing consumers, business, industry and education during a six week period from 19th October 2009 to 27th November 2009. These included representatives from Australian consumer interest groups, industry associations, manufacturers, testers, retail associations, retailers, the care labelling Standards Committee, the education sector, consumer protection agencies and the New Zealand standards agency.

Several respondents indicated long standing involvement in their industry preceding the introduction of the mandatory standard, as well as actively participating in its development and/or review and demonstrating knowledge of its history and the issues involved.

Recipients of the draft RIS were invited to circulate the document to any interested party not identified in the original distribution list and from responses received it is evident the paper was circulated beyond the original list.

As there was little useful quantitative industry data available other than ACCC complaint data to inform the review, dry cleaners, consumers and other affected industries were invited to provide details of the costs incurred as a consequence of absent labelling. Views were also sought from suppliers on the potential cost savings associated with using more generic care labelling or by not providing labelling at all. Limited information on actual

³ National Garment Industry Sustainability Roundtable Summary Report 29January2010 Melbourne, Australia.

costs was received from only two respondents each of which only provided labelling costs which ranged from .2 to 2 cents per garment.

The majority of the responses received to the draft RIS were from Dry Cleaning industry representatives, comprising 14 out of the total 28 submissions. The remainder came from a mixture of industry associations (2), a retail association (1), retailers (4), test houses (4) in the private and education sectors, one wholesaler, one standards committee member and a government department. No consumer groups were directly represented in the responses.

See table at **Appendix A** for a summary analysis of the stakeholder responses and see **Appendix B** for a summary overview of the responses received and comments provided.

CONCLUSION AND RECOMMENDED OPTION

The review has concluded that there is a case for continuing to regulate the provision of care labelling for clothing and textile products.

Option 4 where the status quo is maintained and a consumer product information standard for *Care labelling of clothing and textile products* continues to be based on Australian Standard AS/NZS 1957:1998 with minor variations is recommended.

The review finds that there exists a possibility of a ‘potential market failure’ whereby garments and textiles will be damaged in significant numbers if appropriate and adequate care instructions for clothing and textiles are not provided. Industry representatives advise there is a significant probability that low end manufacturers and suppliers will not provide care information voluntarily if not required to do so, potentially exacerbating detriment for financially disadvantaged consumers.

The review noted the accountability the regulation affords consumers, small business, such as dry cleaners, retailers and small scale manufacturers a dispute resolution mechanism by enabling attribution of liability for product cleaning failures.

The review finds that the current regulations do not unreasonably restrict international trade as many of Australia’s trading partners also have a form of mandatory care labelling or well established and accepted voluntary codes and if not, the costs of compliance for new entrants to the market are not burdensome.

The regulation is a consumer protection mechanism that enables consumers to make informed choices when purchasing and to extend the useful life of garments and attribute liability for product cleaning failures.

The review did consider encouraging the use of a symbols only permanent label supplemented by a non-permanent swing tag with symbols and their corresponding written instructions. However, given that there are at least 3 different symbol regimes in use in the EU, US and Canada and Japan that a symbol based approach could be revisited when a single accepted set of symbols emerges as the most prevalent international standard.

Taking into account the views expressed by the range of industry participants, the low cost of administering the regulations, high rates of compliance, low complaint levels and the benefits derived by consumers, the continued care labelling of clothing and textiles is both desirable and justified.

Appendix A

SUMMARY ANALYSIS OF STAKEHOLDER RESPONSES

No respondent from any sector was supportive of the option for self regulation. One respondent was in favour of the option of fibre content only labelling and seven actively opposed it. Six respondents supported or would consider a case for non-prescriptive regulation to increase flexibility and overcome requirements for specific wording of instructions in the regulations. Although concerns were raised as to how ‘adequate’ instructions would be defined or interpreted by different parties with conflicting interests. One respondent actively opposed it.

The main theme which emerged was concern over attribution of accountability for product cleaning failure if the status quo is not maintained and the detrimental impact this would have for consumers, business and government expressed by the majority of respondents across all sectors.

The overwhelming majority (20) was in favour of retaining regulations on the basis that they are comprehensive and effective, reduce costs and assist in dispute resolution for business, consumers and government. They stated that based on experience, voluntary compliance had not been successful in the past in Australia as a result of significant numbers of disreputable operators in the Textile Clothing and Footwear industry (TCF) and some in the dry cleaning industries and marketeers selling directly to consumers seeking short term profits with little or no regard for their product, service or the consumer. Two respondents actively opposed maintaining the status quo.

With the exception of one respondent providing details of complaint numbers in Victoria, case studies, results of surveys and examples in support of submissions, the arguments presented are supported in the main by opinions based on personal or industry experience or technical expertise gained over numbers of years.

All submissions were taken into account and responses from stakeholders with authority, industry experience and technical expertise, were afforded a high level of consideration of their claims and reasoning in the absence of comprehensive supporting data.

The refuting of the option for ‘self regulation’ received a disproportionate level of attention relative to the other options.

Table 1 - Summary overview of 28 responses received

The following table is a summary overview of the support/opposition (overall and by sector) for each of the four options received during the consultation period for the review of the mandatory standard for care labelling of clothing and textile products.

Note: One respondent, a retail association was not able to offer a consensus position on behalf of its members and declined to offer a position.

Option	Overall support	Supported, by sector	Not supported, by sector	Summary of comments
1. Self regulation - repeal standard	nil	Nil	27 (all sectors)	General consensus that market forces unlikely to result in voluntary care labelling, resulting in Australia becoming dumping ground for inferior product. Opinions expressed that low level of complaints to the ACCC indicates that regulation is effective. Dry cleaners concerned re: attributing liability for cleaning damage. Whilst not supported, a respondent thought the option viable.
2. Amend regulation - adequate care instructions	6	Retailer - 1/4 Industry Assn - 1/2 Test lab - 1/4 Standards C'ee 1/1 Wholesaler 1/1 Dry Cleaner 1/14	Dry Cleaners - 1/14	Include '& appropriate' in option. Less prescription specifically for furnishing labels desirable. Opinions expressed that consumer education required for a symbols based regime. Include mandated fibre content in option.
3. No care instructions - mandate fibre content only	1	Retailer - 1/4	Industry Assn - 1/2 Dry Cleaners - 5/14 Retailer - 1/4	General sentiment expressed that this option poses problems for components in garments, multiple & innovative fibres. Dry cleaning sector report that fibre content is not guide to cleaning methods - regard is also required for finish, fasteners, and dyes.
4. Maintain Status Quo	20	Dry Cleaners -13/14 Govt Dept - 1/1 Industry Assn - 1/2 Retailer - 2/4 Test Labs - 3/4	Wholesaler 1/1 Retailer - 1/4	Abstention by retail association is because members could not reach consensus position, divided support for various options. Care instructions vital for maintaining personnel uniforms. Repeal to cause misalignment with NZ - Trans Mutual Agreement - adds significant costs for major retailer. Dry cleaning sector seek amendment to regulations to include GreenEarth as a cleaning method.

Table 2 Overview of comments received, by sector and ACCC response

The following table presents an overview of the comments received from each of the submissions during the consultation period for the review of the mandatory standard for care labelling of clothing and textile products and the ACCC’s response.

NOTE: The names of individuals, businesses and organisations have been removed to protect their privacy, spelling corrections made.

General comments		Sector	ACCC response
1.	We agree that the Australian Government has a duty of care to its people. Whilst the Productivity Commission examines the cost benefits to the Australian community it does not measure other important indicators i.e. health (stress levels), time wasted, environmental impacts, well being. We would argue that putting a time impost on consumers to search for appropriate and adequate care labels disadvantages the common interests of the sector and adds to the burden of household cleaners and well as industry launderers and dry cleaners.	Ind Assn (1)	Agreed. Care labelling has a variety of tangible & non-tangible benefits in the community.
2.	In addition the TCF sector characteristics must also be acknowledged. TCF has a low barrier to entry with a high failure rate of new business. It is also highly fragmented making communication difficult. That means knowledge of appropriate care labelling can be scant particularly with new entrants who are able to enter the sector with no qualifications and experience. Without a mandatory standard the risk to the consumer of incorrect labelling is increased. The argument put forward also fails to acknowledge Australia’s position in the global environment where there is a move to find a common care labelling regime.	Ind Assn (1)	Noted.
3.	<u>Changes to the Market.</u> However all acknowledge that in the common interest of the TCF sector competing for a share of household expenditure, any impost on the consumer that makes accessing care instructions difficult or time consuming would be a backward step and make the purchase of TCF product a risky business. Given that 87% of the TCF industry is in made up of businesses which employ 20 people or less consideration must be given to SME’s and how best to serve their needs. A mandatory standard does offer guidelines for them to follow and as they represent the majority of businesses it would be prudent to have them benefit from the surety of guidelines.	Ind Assn (1)	Noted
4.	A widely representative body looked at the many problems caused by voluntary regulations and after many years of meetings and wide consultations delivered the current standard which addressed and eliminated almost all of the disadvantages and problems.	Ind Assn (2)	Noted.

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General comments		Sector	ACCC response
5.	The mandatory Standard covering care labelling has served the Australian consumer very well and the number of complaints ultimately handed by the ACCC is very low as a result.	DC (9)	Noted.
6.	<i>“ACCC records, available from 1995 to 2009 record a total of 654 care labelling contacts of which 79 or 12 % are complaints about damage. The total value of all garments reported damaged to the ACCC over a 14 year period is \$7,553. The single textile damage report in the 14 year period concerned an item of furniture valued at \$6,500.”</i> The reason for this is that we have the best care labels in the world and almost every problem is resolved before it gets to ACCC.	DC (2)	Noted.
7.	Over the 30 year history of the standard there has been minimal complaints to the Australian Competition and Consumer Commission (ACCC), an indication that could be interpreted that it has by and large been successful.	Ind Assn (1)	Noted
8.	The International Fabricare Institute Garment Analysis Garment Laboratory receives an average of 50,000 garments a year. Articles are submitted by drycleaners, launderers, Better Business Bureaus, consumer protection agencies, retailers, and manufacturers. This would only be a proportion of garment failures bought about by inadequate Care Labelling Legislation.	DC (2)	Noted. Europe is a substantial market compared to Australia.
9.	We know of some big retailers who test samples of garments that they sell and we don't see their garments becoming the subject of a dispute. They comply; and for their customers, the result is a garment that is value for money.	DC (9)	Noted.
10.	In all of this there is an emerging need for a simplification of care labels and their symbols.	DC (9)	Noted. Problematic, lack of worldwide harmonisation.
11.	Low labelling of garments in any manner is a barrier to greater sales, consumer confidence and garment serviceability.	Ind Assn (1)	Noted. Option 2 would not necessarily lead to lower standards of labelling.
12.	The cost of a label is miniscule and can be added to the makers brand label or the fibre content label for a fraction of a cent. To say that it adds to the cost in any significant way is misleading at best.	DC(2)	Noted. Although no submission was able to substantiate this assertion.
13.	Consumers are not made fully aware by the boutiques that they are being sold a highly priced, one wear only garment.	DC (1)	Noted. Reflected in ACCC consumer complaints.

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General comments		Sector	ACCC response
14.	<p>Re: the low cost of complaints about damage. From my experience, many people do not complain about problems with their garments, particularly if they later refer to their care label. They may have unwittingly put their garment in the washing machine or tumble dryer with other articles and afterwards realised their mistake. Also, many consumers lose confidence in the supplier and just do not re-purchase rather than wasting time and effort complaining. There is no way of measuring the loss of customer support for a particular brand due to poor performance. I am sure that if care labelling was no longer mandatory, that fabric damage and resulting customer complaints would escalate due to incorrect care.</p>	Ind Assn (2)	Noted & agreed.
15.	<p>Re: there are more “textiles with easy to use and ‘easy care’ characteristics”. Providing the correct washing and dry-cleaning conditions as set out on the care label are used, textiles can continue to be ‘easy care’, but they can still be abused, for example if too high an ironing temperature or too high a tumble drying temperature is used on a textile with an ‘easy care’ finish. How is the consumer to know what makes the textile easy care unless there is a care label advising them of correct cleaning conditions to maintain its properties.</p>	Ind Assn (2)	Noted & agreed.
16.	<p><i>“Problems exist for regulators attempting to enforce aspects of the care labelling mandatory standard as testing often cannot provide an objective or definitive assessment of whether a cleaning method is in fact suitable for a fabric or textile.”</i></p> <p>With adequate testing this is just not so. There are a number of organisations that can test and give appropriate care instructions. Please give examples. Why should a consumer be stuck with a product that is not serviceable and cannot be cleaned. Let me give just a couple of examples. A mother, who worked as a shop assistant, scrimped and saved to buy the first ever really expensive dress to wear to her daughters wedding. It was a crepe wool with a vinyl pattern melted into the fibre and carried a dry clean only label. The crepe wool could not be washed and the vinyl could not be dry cleaned. The \$700 garment was unserviceable the minute it was stained and yet A, the maker, commented it wasn’t their problem. B (retailer), once they were aware of the facts refunded the customer. C had a line of Women’s coats that had a printed pattern. The coats could not be washed and the printed pattern could not be dry-cleaned even though the coat carried a dry clean only label. Without our current regulations these and thousands of other consumers would be disadvantaged and it would be far too costly in time and money to pursue their legitimate rights.</p>	DC (2)	Noted.
17.	<p>The fact that there are nearly no complaints, indicates the current system is working. Some form of dispute resolution is still needed. It is hard to see any cost benefit and in fact Government sponsored dispute resolution costs would increase dramatically.</p>	DC (2)	Noted. See comment # 5.

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General comments		Sector	ACCC response
18.	New Zealand has adopted Australian Standard 1957-1998 as a mandatory standard, which aligns with the current Australian requirement. Repeal in Australia may mean that under the Trans-Tasman Mutual Recognition Arrangement the care labelling requirements for both countries will be misaligned.	DC (2)	Noted.
19.	The introduction of the mandatory standard has improved the quality of all merchandised fabrics in this country leaving consumers confident in the knowledge that what they are buying will survive for its anticipated life as long as it is cleaned in accordance with the directions provided by the manufacturer. It has made manufacturers responsible for quality control of their merchandise.	DC (3)	Noted.
20.	The TCF sector has the highest number of new entrants particularly at retail level. Staff turnover amongst these establishments is high so it would be incorrect to assume that the practice of appropriate care labelling would continue should the regulation be repealed. In fact the speed with which the manufacturing sector has moved offshore demonstrates a capacity for quickly adopting to changes in legislation.	Ind Assn (1)	Noted.
21.	Eco-cleaning movements are also gaining momentum and should be considered as influential in driving consumer sentiment. Australian initiatives on display at Copenhagen Climate Change talks such as 1 Million Women list garment care as one of the areas consumers can save energy.	Ind Assn (1)	Noted. Care labelling provides an opportunity for addressing environmental issues.
22.	Current care labelling regulations do not allow the GreenEarth solvent to be selected as an option by the Australian supplier nor for the consumer to request such a safe, non-allergic alternative. As such, we suggest the following option be considered by ACCC: -Continue mandatory regulation -With modifications, identified below, which will provide -greater flexibility for suppliers thereby reducing costs, -increasing consumer options, and -maintaining consumer confidence	DC (4)	Noted. Revised CPN to address innovations in cleaning technologies. Methods referred by generic chemical names, not trade marked names.
23.	The Committee under the secretariat of the Association supports the government review of this Care Labelling regulation, but as we have a number of members with differing opinions, a single collaborative response is not possible. we acknowledges that, from time to time, it may not be able to reconcile differing views on particular matters. In these instances we encourage its constituents to contribute to the consultative process by making individual submissions.	Retail Assn	Noted.

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General comments		Sector	ACCC response
24.	The soft furnishing industry resisted care labelling in the beginning but curtain manufacturers have really improved the information that is supplied, especially on coated or rubber backed fabrics.	DC (7)	Noted.
25.	Retailers and brand owners recognise that to include care instructions provides good customer service and reduces contact from dissatisfied customers.	Retailer (3)	Noted.
26.	As I have not worked in the soft furnishing industry for many years, I forwarded your message to some people in the industry association but have not received a response to date. I did review the proposal though and my personal choice would be to only place content labels on items as the cleaners can then refer to their database of cleaning processes to ensure that they get it right. It would still be appropriate however to place a possible shrinkage on the content labels so that consumers can see that there is a possibility of shrinkage.	Standards committee member	Noted, however cleaners overwhelmingly want information on labels. This option would preclude consumers who do not have relevant knowledge & wish to exercise their discretion to clean the items themselves.
27.	Misalignment of the standard in both countries would pose operational difficulties for us. If not recognised under the Agreement, we would invariably have to comply with the New Zealand requirements, which would impose significant additional costs. To split Australian and New Zealand orders to be compliant with each country's requirements would be extremely difficult and time consuming. We would therefore adopt the most stringent requirements and undertake a nationalised approach. This would seem an extremely costly and burdensome approach, and a result of which total deregulation would unlikely be achieved.	Retailer (1)	Noted. The Trans Tasman Mutual Recognition Agreement provides that if the product meets either Aus or NZ standard, the other country automatically recognises it as being compliant with its own regs. & is obliged to accept it.
28.	Testing in fact does provide guidance for advisory care labelling if conducted in a common sense manner. Potential problems can be found by conducting relevant tests related to the end use of the fabric. Testing houses have the required experience to achieve this. For example tumble drying can be a major problem with shrinkage of some garments (as well as damage due to the wrong heat setting) and there would be far more customer complaints if the care label did not advise 'do not tumble dry'. Also washing coloured towels with other items can cause disasters, so the 'wash separately' label is essential.	Ind Assn (2)	Noted.

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General comments		Sector	ACCC response
29.	I feel it is folly for manufacturers and/or retailers to blame cost of compliance as a reason not to care label, the cost per garment could not credibly increase unit costs to the detriment of the consumer. Garments purchased from Europe and Japan seem to be extensively labelled without adding any extra cost to the garment.	DC (7)	Noted though no respondent was able to substantiate the claim with verifiable figures.
30.	Consultation with our members revealed that there is never an instance where proper testing didn't determine the appropriate care instruction.	Ind Assn (1)	Noted.
31.	Unlike clothing, furniture tends not to be cleaned (sadly) as it is perceived as too difficult. A regular vacuum and spot clean using commercially available products is the most common. Consumer concerns, and financial compensation relating to furniture items, is very rare. However, appearance change as a result of NO care is quite common.	Wholesaler	Noted.
32.	Prior to the introduction of Care Labelling, many cheap imports of poor quality were marketed in this country. One instance concerned vegetable dyed garments from South East Asia in particular. The dyes were both solvent and water soluble so that after one cleaning either at home or by a professional cleaner, the dyes all ran leaving the original garment without colour/pattern/design and a whole lot of other garments in a load contaminated.	DC (3)	Noted. Care labelling probably has had the effect of improving the quality of garments imported.
33.	As there have been innovations in professional care equipment and chemicals, these could be incorporated so the Product Safety Standard reflects the latest information. Reference to ISO 3758 -2005 with the addition of silicon based solvents (eg GreenEarth®) within Table 5 under F (in a circle) should be sufficient to cover these aspects. At the moment high flash point hydrocarbon solvents and silicon based solvents are precluded and their use could / would be considered a breach except for items labelled A (in a circle) or where no symbol is given.	Test lab (3)	Noted, see comment 20.
34.	There have also been updates in terminology – the spaces between dry and clean (and variants) plus wet and clean (and variants) have been removed (ie they are one word descriptors). This had already been adopted in AS / NZS 1957 Table 1 Section E, the Drycleaning Institute of Australia, the Drycleaning and Laundry Institute (USA – formerly IFI) to name a few as well as in the Consumer Product Safety Standard. Perhaps you might call this editorial but it is important to keep up-to-date.	Test lab (3)	Noted. The revised Consumer Product Information Standard will allow this new terminology.

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General comments	Sector	ACCC response
35. Given the volume of imported apparel product (approx 1bil units per annum) and the rate that imports are growing in some product categories (imported T Shirts growing at 40% greater than population rate) concern has been expressed about Australia becoming a dumping ground for poor quality product. Removal or relaxation of care labelling regulation lowers the bar and increases the risk of consumer frustration and in turn likely damage to garments.	Ind Assn (1)	Noted. Given the volume of current imports quoted, it is unlikely that option 1 would result in consumers benefitting significantly from increased range of goods available, nor from reduced prices..

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1 Self regulation - repeal standard		Sector	ACCC response
1.	Without regulation or with self regulation the consumer is invariably trapped with no practical recourse in the event of product failure. All parties from manufacturers to retailers to care providers will point to someone else to take responsibility. Eventually it is not worth the time for the consumer to pursue justifiable compensation and the (generally) innocent party is left out of pocket which in many cases is a significant hardship.	Ind Assn (1)	Noted.
2.	Consumers are normally time poor and as was pointed out in the RIS are looking for ways to save time. Do not take from the consumer the best tool they have to get compensation from inappropriate behaviour by drycleaners and retailers. Ask why would any reputable retailer want to sell a product that had not been properly tested and as pointed out labelled accordingly.	DC (2)	Noted.
3.	Please show example of garments restricted from coming in. The writer has travelled extensively to many parts of the world and sees nothing overseas that is not available here. Any retailer/importer seeing an opportunity for profit would not hesitate to comply with current regulation. All cost studies to date put the extra cost of labelling between .2 of 1 cent and .5of 1cent which is hardly a barrier and certainly not a deterrent to the consumer.	DC (2)	Noted. Although no substantiation provided for figure quoted. It is acknowledged that care labelling probably does not restrict choice for Australian consumers in any significant way.
4.	If voluntary labelling emerges, will there be a legal requirement that it be accurate in what it states or recommends?	DC (9)	Yes. Exists currently under TPA under general misleading representations.
5.	Labels cost cents and their abandonment won't make much difference to the cost of garments. Testing doesn't make much difference either as one test may well relate to a run of garments numbered in their thousands.	DC (9)	Noted.
6.	The statement that repealing the Act may lead to an increase in garments coming into Australia (because our standards have dropped) is beyond doubt. We could become a dumping ground.	DC (9)	Noted.
7.	Dry cleaners on the other hand will need better, more expensive insurance and the time spent examining each garment will increase - at a cost.	DC (9)	Noted.

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1	Self regulation - repeal standard	Sector	ACCC response
8.	Most retailers have their own standards and specifications in place and will control their care instructions according to garment design, fabric type and fabric performance. Self regulation would make it difficult for retailers to enforce quality standards.	Retailer (1)	Noted. Most likely to effect the smaller retailers.
9.	If the regulation was repealed, we would return to the disasters of the 1960's and early 1970's	Ind Assn (2)	Noted.
10.	The Australian market will have to try and understand a wide range of care labels, including symbols, foreign language or no care label at all.	Test lab (1)	Noted, agreed.
11.	After comprehensive discussions with various manufacturers, test houses and consumer groups: We see no reason why the Australian market cannot try to understand a wide range of care labels, including symbols, foreign language or no care label at all.	Test lab (2)	Noted. Although some consumers will be disadvantaged by this.
12.	How can this conclusion be arrived at? Where are the cost saving and complexity? The cost of damaged garments and dispute resolution would far outweigh any perceived reduction. Would see potential increase in cost (purchaser) to consumer.	DC (2)	The position was a starting point and has changed following the consultation process.
13.	We feel that customer education from the Commission and other relevant textile bodies would be essential if deregulation was to be adopted. This would however be a costly and time-consuming exercise. Clarity from the ACCC on the likely impacts self-regulation would have on retailers who operate in Australia and New Zealand: New Zealand has adopted the Australian Standard 1957-1998 as a mandatory standard. We would therefore question whether repeal in Australia may lead to misalignment of the two countries standards under the Trans-Tasman Mutual Recognition Arrangement.	Retailer (1)	Noted. Re point 1 - agreed. Re point 2 - see comment 25.
14.	Dry cleaners would have to make their customers sign that they will not hold the dry cleaner responsible for damage. If there is no instruction on the garment there will also be more damage claims against the retailer.	Retailer (2)	Noted. Agreed.
15.	Retailers and brand owners will continue to provide care instructions regardless of whether there is a regulation that specifies that they be included. It could also be argued that there is already an avenue within the Trade Practices Act for disgruntled customers to return "faulty" items to retailers for compensation for injury, loss or damage that arises from a "faulty" product, or where products fail to be of "merchantable quality".	Retailer (3)	Noted. This proposition is disputed by industry representatives.

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1 Self regulation - repeal standard		Sector	ACCC response
16.	If labelling was optional then the consumer and the professional cleaner might not have recourse to claim on the supplier without lengthy and costly arbitration	Test lab (3)	Noted. Agreed.
17.	Care labelling in most products is set out in accordance with AS/NZS 1957 although where there has been a complaint and product failure occurs the blame inevitably can be laid on the supplier – they have not adequately done their homework – removal of reference to AS/NZS 1957 and AS/NZS 2621 and related standards would take away the ability of a consumer, professional cleaner or textile expert to exercise recourse.	Test lab (3)	Noted. Agreed.
18.	<p>We are not opposed to the prospect of self-regulation per se however would request that the ACCC consider the following issues that may impact our stores and consumers in general:</p> <p>a) A lack of information provided to customers on how to adequately care for their garments.</p> <p>Whilst we currently receive a minimal number of complaints from customers in relation to clothing and manchester damage due to incorrect garment care, our concern is that this number may increase if care labelling requirements were to become voluntary. Customer service is critical to the business and we would be weary of any initiative that invited potential customer dissatisfaction. All complaints and queries received by customers are handled by our Customer Relations team. Obviously an increase in customer complaints impacts the resourcing level of this team and again we would be weary of adopting an approach that may do either of the above.</p>	Retailer (1)	Noted; Larger retailers should have the bargaining power to demand care labelling through effective contract management. It is acknowledged that smaller suppliers in the supply chain are likely to abandon the requirement if not regulated.
19.	Without a care label OR a fibre content label, the cleaner is at risk in all cases should a garment fail to perform if he cleans it under our Common Law. For this reason, every garment presented at our store without a care label must have a "Customers Own Risk" form signed by the customer stating that they are aware that there is no care label and that we have advised them of the risk of cleaning and that notwithstanding our negligence, they accept the risk of the garment failing if we clean it. To remove all care labels would make business impossible under the current Common Law.	DC (3)	Noted.

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1 Self regulation - repeal standard	Sector	ACCC response
<p>20. We believe the removal of care labelling (the name of the label is fairly self explanatory) will have a negative impact on our business and the industry as a whole. With the amount of different fabrics around in today's industry it is becoming increasingly difficult too determine what a garments exact cleaning requirements are without referring to the care label. Without the label we would be forced to turn away business. There are a few negatives to this, firstly our business revenue and experience in cleaning different clothing and two the customer being left more open to the dodgy cleaner and themselves not knowing how to best clean or treat their own garment. The care label is the guarantee for the care of the garment after purchase.</p>	DC (8)	Noted.
<p>21. The manufacturer is the only one who knows what material is used to make up a garment and what the properties are of those individual elements. Without a guide as to what is the best way to care for a garment, consumers are left to guess what should be done with the fabric, especially if the garment is made up of a number of different materials. A professional cleaner is in the same position. Without the knowledge gained from both the care label and the fibre content label, professional cleaners are in a position where they have to guess as to what is the best way to clean a garment. I am a dry cleaner. My staff and I look at almost every care label and fibre content label prior to cleaning a garment. Once upon a time, many garments were made up of only natural fibres. Textile manufacturers have invested large amounts of time and money in R & D to come up with synthetic fabrics that although they "look" like natural fibres have different properties to natural fibres and require different cleaning procedures. Without the labels it is impossible to be sure how to give the consumer the best advice and how to properly care for a garment.</p>	DC (3)	Agreed.
<p>22. Consumers should not have to resort to trial and error methods to discover the appropriate care measure. Nor should they suffer losses because suppliers provide inadequate or incorrect care instructions. The extra cost to Government in administering compliance and dispute resolution could only be described as a significant increase. Without regulation or with self regulation the consumer is invariably trapped with no practical recourse in the event of product failure. All parties from manufacturers to retailers to care providers will point to someone else to take responsibility. Eventually it is not worth the time for the consumer to pursue justifiable compensation and the (generally) innocent party is left out of pocket which in most cases has a limited disposable income. Often cleaners have had experience where a client has saved for a long period to buy a special (expensive) garment only to find it cannot be cleaned and may be rendered useless within hours of its first outing because of a minor spillage.</p>	Ind Assn (1)	Agreed.

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1 Self regulation - repeal standard		Sector	ACCC response
23.	The original Committee met for many years to formulate what is probably the worlds' most practical care labelling standard. The Committee was drawn from a wide cross section of the community with expertise covering all aspects of textile care comprising the following list plus representatives from various other interested organisations from time to time such as the Curtain Industry Association and Leather Clothing Manufacturers.	Ind Assn (1)	Noted.
24.	The TFIA notes the reference made in the 1997 Care Labelling Review Report that anecdotal evidence suggested a voluntary standard was not widely adopted prior to the implementation of the mandatory standard in 1979. Since then it is our belief that market forces have grown and competitive pressure increased thereby reducing any likelihood that voluntary standards would be widely adopted in the current environment.	Ind Assn (1)	Noted.
25.	It is noted that a small number of complaints have been received by ACCC over the period of the standard. It would be fatal to assume therefore that a standard is not needed. Perhaps the standard is working or perhaps consumer complaints are directed to the entity where the purchase was made and in most cases they were placated i.e. given a replacement article or adequate compensation.	Ind Assn (1)	Noted.

2 Amend regulation - adequate care instructions		Sector	ACCC response
1.	Adequate care labelling that gives the consumer the choice of which care method they use gives them the choice of caring and time saving that best suits their needs. There are times when fashion jeans may need to have specialist stain removal. The Purdue University of 962 respondents showed that 72.4% will not dry clean a garment labelled with only washing instructions. The Urbana-Champaign survey showed that only 34% believed a washable garment could be dry cleaned. Our own Nexus survey showed that 79% would not take a garment with difficult stains to a dry cleaner if it only had washing instructions only. 52% believed it was misleading not to include alternative care methods on the label. In an AATCC survey only 12% of 650 respondents considered dry cleaning procedures safe for fabrics labelled washable.	DC (2)	Noted.
2.	The up front trap here is, what will the word "adequate" ultimately be construed to mean. We already have problems with 'vexatious', 'predatory' and 'unconscionable'.	DC (9)	Noted however. 'Adequate' is defined in AS/NZS 1957:1998

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2 Amend regulation - adequate care instructions	Sector	ACCC response
3. The consumers would be confused with just symbols as Australia is multi cultural and symbols differ throughout the world. Manufacturers who are selling to other countries may get symbols confused.	Retailer (1)	Agreed
4. Greater flexibility in the type of labelling will provide reduced costs to the suppliers and ultimately the consumer, address current and perhaps future cleaning options, and continue to provide adequate care labelling for the consumer and the drycleaner to maintain their garments after purchase. A proposed concept for the drycleaning instruction, when that is the appropriate method, is that it must state at least one type of solvent that may be used to include such examples as hydrocarbon, perchloroethylene, and GreenEarth. This approach provides some latitude, by the suppliers to provide a method of cleaning, but not require them to identify the only allowable method. This also provides flexibility as cleaning options evolve. This modification is consistent with the option to provide guidance only for 'adequate care instructions', but flexibility for alternative cleaning options from a professional dry cleaner.	DC (4)	Noted. Revised CPN to address innovations in cleaning technologies. Methods referred by generic chemical names, not trade marked names.
5. Adequate care would be difficult to control by retailers with their own standards and specifications. If a manufacturer is allowed to decide what is 'adequate' it may contradict the standards of the retailer. Once again symbols are not enough on their own as these vary from country to country. The basic principles of English, legible, attached and accessible must stay in place but care should also remain mandatory.	Retailer (2)	Re point 2 disagree. Adequate is defined in AS/NZS 1957:1998. Re point 2 agree.
6. We are committed to compliance with all mandatory standards. However, with the care labelling requirements being very prescriptive, even minor technical breaches require corrective or preventative action. Such action can result in significant compliance costs, but without providing any net benefit for consumers (e.g. having to attach permanent care instructions instead of relying on non permanent instructions provided on a leaflet or on packaging).	Retailer (3)	Noted however consider that permanent labelling is important to access care information for the life of the garment. Prescriptivism addressed somewhat with 'words to similar effect' permissible in updated regulation.
7. Where the Australian care labelling standards differ from those internationally, especially in regard to technical content, this creates a compliance burden and potential trade barrier when trading internationally (e.g. where dry cleaning or laundering instructions are required internationally, whilst both dry-cleaning and laundering instructions are required in Australia).	Retailer (3)	Noted. Although the market is highly competitive and barriers not considered significant.

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2 Amend regulation - adequate care instructions	Sector	ACCC response
8. "care symbols" could be deemed 'appropriate' if consumers have easy access to translate or interpret such symbols. It is believed that this is a topic that requires further debate as part of the review and finalisation process.	Retailer (3)	Agreed.
9. We are supportive of a care-labelling regime that requires care instructions to be both "adequate" and "appropriate". To be "adequate", garments treated in accordance with care instructions must be cleaned without having an adverse affect on the quality or function of the garment (e.g. garments should not lose their colour or shrink excessively as a result of being cleaned). To be "appropriate", care instructions should be sensible and reasonable (eg. It is not "appropriate" to have "Dry clean only" on a towel, or to have "machine wash separately" on kids' underwear). To be "appropriate", care instructions would also need to be written legibly in English and readily accessible to consumers at the time of making purchase decisions. Care instructions should not need to be permanently attached as part of this criteria. The concepts of "adequate" and "appropriate" may prove difficult for regulators to clearly define in a way that allows regulatory enforcement teams to assess the compliance status of care labels.	Retailer (3)	Noted however consider that permanent labelling is important to access care information for the life of the garment.
10. Care symbols give all the necessary information on washing, bleaching, ironing, dry cleaning and tumble drying. Without this information, the consumer can hardly decide on the appropriate care treatment because it does not depend only on the main fabric which composes the textile article. Indeed, all the components of the said textile article shall be taken into account : other fibres, accessories, but also dyeing, finishing treatments and texture.	Ind Assn (1)	Agreed
11. Using care labels provides the consumer with care information he does not have to decide on. Indeed, the consumer does not have experience and technical support to decide on care treatment. Observing information given with the symbols, the consumer will avoid wrong treatments and consequently premature wearing out. He will therefore obtain better results.	Ind Assn (1)	Agreed
12. Care labelling is determined under the responsibility of the garment maker in common interest of textile manufacturers, dry cleaners and of course consumers. Thus care symbols are recommendations on how to clean a textile article on which they are affixed, they should not be considered as a use guarantee neither as a quality mark. Symbols refer to maximum permissible treatments that a textile article can bear without irreversible damage. More severe treatments can always be applied.	Ind Assn (1)	Agreed.

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2 Amend regulation - adequate care instructions	Sector	ACCC response
13. In this day and age consumers have probably seen enough symbols on garments (quite often symbols and words are used) to understand the care conditions required. To help them if symbols only are adopted (considering that there are slight variations due to country of origin) surely a small chart can be provided at point of sale with the most common versions. Also wall charts could be provided where items are displayed.	Ind Ass (2)	Noted.
14. Personally I am happy with the acceptance of symbols only as any label is better than none. It would then not be mandatory for importers to replace the existing label with words. I suggest that importers check the label to be supplied on items before shipping. In many cases they could have a choice of one compatible with Australian care labeling.	Ind Assn (2)	Noted.
15. After comprehensive discussions with various manufacturers, test houses and consumer groups Who will regulate the symbols and will the labels be flooded with so many different types of symbols from various countries that effectively confuses the final consumer of the product. What needs to be addressed here is "How will the consumer be educated in the use of the symbols?"	Test lab (2)	Noted.
16. This was the situation prior to the current legislation was put in place. It is interesting to note that in the 1997 review, before the discussion papers were put out for comment a number of industries were consulted "Retailers and manufacturers also considered adequate labelling to be necessary to reduce the need for costly settlement of claims related to inappropriate care. NONE OF THE INDUSTRIES CONSULTED CONSIDERED THE REQUIREMENTS OF THE REGULATION TO BE ONEROUS." (see page 9 of the review papers).	DC (2)	Noted
17. The consumers would be confused with just symbols as Australia is multi cultural and symbols differ throughout the world. Manufacturers who are selling to other countries may get symbols confused. 'Adequate care instructions' Adequate care would be difficult to control by retailers with their own standards and specifications. If a manufacturer is allowed to decide what is 'adequate' it may contradict the standards of the retailer. Once again symbols are not enough on their own as these vary from country to country.	Retailer (2)	Noted.

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2 Amend regulation - adequate care instructions		Sector	ACCC response
18.	I am a retail drycleaner concerned with the current care labelling requirements. I provide GreenEarth, an environmentally friendly, safe, and fully degradable cleaning solvent for my retail customers' garments, but current care labelling regulations do not allow the GreenEarth solvent to be selected as an option by the Australian supplier nor for the consumer to request such a safe, non-allergic alternative. As such, I am requesting that you modify the requirements to allow garment manufacturers to select an appropriate cleaning process which may include GreenEarth and also allow drycleaners to use their professional judgment in selecting alternative cleaning methods that may be or may become appropriate in the future. I believe this policy will allow greater flexibility for garment manufacturers thereby reducing costs, increasing consumer options, and maintaining consumer confidence.	DC (5)	Green Earth method will be accommodated in revised regulation.
26.	The current regulations include coverings used in furniture. As the vast majority of furniture uses a combination of fixed and removable elements, and is usually made up of a number of different pieces, the ability to apply care labels to every piece without affecting appearance is almost impossible. Where there is a combination of fixed and removable coverings, care labels need to carry the warning 'do not remove for separate cleaning' as the combination of cleaning on removable, and a different instruction for fixed coverings, will result in a variation in appearance on the furniture.	Wholesaler	Noted. Generally this problem is not insurmountable and would only apply to a minority of items.
27.	Suppliers of products with specific maintenance needs, such as leather, need to provide quite lengthy recommendations which cannot be contained in a care label. Furniture coverings are usually selected from a sample book or hanger, and it is industry practice to include care instructions on the sample. In summary, I do not believe that care labelling has been a benefit to the furniture industry. I am attracted to Option 2, which I understand to allow suppliers to add appropriate care instruction information in different ways, including via the web, and using a generic label that refers consumers to their site. Failing this, I would recommend that furniture is removed from the current regulation, leaving suppliers to use market forces to address the issue.	Wholesaler	Disagree. Furniture is a large ticket item. Manufacturers have successfully been able to provide required care information on labels and do so. Option 2 still requires labels to be permanent & adequate & appropriate, it may permit the use of symbols to convey all the information.
28.	Symbols by themselves create another problem as they are copyright (Ginetex) so this could be an impost on Australian suppliers unless an arrangement can be negotiated. Standards Australia negotiated the use of the drycleaning symbols when AS 1957 was first drafted.	Test lab (3)	Noted.

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2 Amend regulation - adequate care instructions	Sector	ACCC response
<p>29. We would endorse the ACCC’s proposal to amend existing regulation, however would seek further clarity on the definition of ‘adequate care instructions’, and confirm whether it may relate to a minimum requirement. We would support the use of symbols adopted from the EU or US Standard, and suggest that all businesses operate under one nominated standard. However as discussed in Option 1, We feel that customer education would be an essential component. Tags explaining the meaning of such symbols would likely be required, however again such action would incur huge costs which we would not endorse. We feel that, in terms of consumer confidence and understanding, it would be more appropriate to use words rather than symbols, should this option proceed.</p>	Retailer (1)	Noted. Agreed.
<p>30. Furthermore, with the requirement to include a fibre content label, we feel it would be appropriate to maintain the requirement for care instructions, albeit in an amended form. As there would be an existing need to produce a label for the garment / textile item, We do not believe it would be unreasonable to require care labelling information also, in order to best inform customers. In summary, we feel that the option to Amend existing regulation to allow ‘adequate care instructions’ would be the most appropriate course of action with respect to the current review of the Commonwealth regulation for care of clothing and textiles. As noted in our response, we would seek further clarity on the definition of ‘adequate care instructions’ to determine what this encompasses, and additionally seek the regulation of fibre content labelling on a Commonwealth level.</p>	Retailer (1)	Noted.
<p>31. I recommend adopting the International symbols for ease of recognition by Drycleaners, and ease of educating consumers (by having the symbol and written word both on the label).</p>	DC (6)	Noted.

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3 No care instructions - mandate fibre content only		Sector	ACCC response
1.	The only possible benefit with this option would occur if the label had to relate to every part/ section or add-on of the garment. Too many garments only have a basic content label, which is often misleading. Most consumers only understand basic or common materials and are entitled to receive data on new materials or mixes.	DC (9)	Noted. Agreed.
2.	The suggestion that the inclusion of fibre content onto garments would provide sufficient indications to customers about the most suitable method of cleaning is rejected. Such a task may prove difficult for customers, especially where garments have multiple panels with varying fibre contents (e.g. a jacket with different fabric in shell, sleeves, hood, filling and lining) or where there are features incorporated onto garments that require special care (e.g. a leather insert, feather trims or dry-cleaning sensitive prints). Option 3 is rejected by us.	Retailer (3)	Noted. Agreed.
3.	For a new dry cleaner or new staff this will be a challenge, as experience and knowledge are not instant. This option will make dry cleaning less attractive as an industry and increase the need for what may need to be compulsory training.	DC (9)	Noted. Agreed.
4.	We recommend and support Option 3 (with the provision that fibre content is updated) as this provides greater flexibility to provide more meaningful and relevant information on care labels, which is problematic and not possible under current mandatory requirements. The provision of relevant and meaningful information on care labelling will assist consumers and prolong the life and performance of products. Further, consistent regulation of fibre content, which is currently a mandatory requirement in most states and territories in Australia would allow consumers and drycleaners to make informed decisions on how to care for garments. We agree that this approach would also enable consumers to identify and avoid garments and textiles that may irritate the skin or provoke allergic reactions.	Retailer (4)	Noted. .
5.	This option is the most dangerous as design is not considered. Some structured designs have linings, padding, Vilene etc that need to be taken into consideration. Fibre content must be regulated together with care instructions in order to protect the consumer and the product. Dry cleaners would have to make their customers sign that they will not hold the dry cleaner responsible for damage. If there is no instruction on the garment there will also be more damage claims against the retailer.	Retailer (2)	Noted. Agreed.

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3 No care instructions - mandate fibre content only	Sector	ACCC response
<p>6. After comprehensive discussions with various manufacturers, test houses and consumer groups:</p> <p>Fibre content labelling does not require the label to include trims or up to 5% of the fibre content. If a small percentage of a more delicate fibre is not stated on the fibre content label, the care instructions selected may be inadequate for the garment. Fibre content labels are not an adequate way of stating the appropriate cleaning methods for garments.</p>	Test lab (2)	Noted. Agreed.
<p>7. Fibre content does not give information on trims, decorations, belt backing, buttons etc. It is interesting to note that the top three damage complaints to the International Fabricare Institute are</p> <ol style="list-style-type: none"> 1. Solvent soluble dye 2. Water soluble dye 3. Pigment prints <p>And number 8 is Fusible interfacings</p> <p>None of these would be apparent to the consumer or dry cleaner from a fibre content label.</p>	DC (2)	Noted. Agreed.
<p>8. We note that fibre content labelling is currently regulated at State level, with individual State provisions. We would endorse the implementation of mandatory fibre content labelling at a Commonwealth level, irrespective of the decision made with respect to care labelling. As per the ACCC's comments, a number of fibres can cause allergies and irritations to individuals and we feel it is important to provide relevant fibre content information to consumers. However we believe that, as per Options 1 and 2, a customer education piece would again be essential. With new fibres constantly being introduced to the market, customers will experience difficulty in accessing and understanding information pertaining to appropriate care instructions for the garment or textile; for example, a customer would not necessarily be aware that bamboo is a fibre which can shrink and should be washed in cold to warm water. This would result in the need for additional swing tags and again, extra costs.</p>	Retailer (1)	Noted..
<p>9. If a small percentage of a more delicate fibre is not stated on the fibre content label, the care instructions selected may be far too severe for that component. Other items such as trims (e.g. leather piping on pockets) are excluded from fibre content labelling, leading to further issues. Consumers and Drycleaners cannot rely on fibre content labelling to ascertain appropriate cleaning methods for garments. If a garment is damaged, there is no consumer protection</p>	Test lab (1)	Noted. Agreed.

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3 No care instructions - mandate fibre content only	Sector	ACCC response
<p>10. 3. Require no Care Labelling by regulate fibre content labelling. How would a consumer know by a fibre content label:</p> <ul style="list-style-type: none"> i. How a garment has been dyed ii. How to care for the buttons or other accessories iii. If the fibre has a treatment that will be harmed but washing and/or Dry Cleaning iv. That many woollen garments can be treated and washed by products such as wool crepe are severely affected by any water treatment v. That pigments dyes on most fibres can be washed but not Dry Cleaned vi. Other prints are water soluble but OK to Dry Clean vii. How to Care for the many garments have a combination of fibres and other materials (leather, plastics, wood, feathers) This does not give information on trimmings, prints, decorations, bent backing , buttons etc. 	Ind Assn (1)	Noted. Agreed.
<p>11. The Development in Fibres, Blends and Finished for Textile Articles have made it difficult, if not impossible for consumers and care provider industries to determine appropriate cleaning procedures from the mere appearance of an article, or even from a description of its fibre content. Because of their composition, many fibres, fabrics and finishes require particular treatment. Unsuitable treatments can cause damage, such as running colours, shrinkage or melting as the result of excessive heat or chemical reaction. Consumers should not have to resort to trial and error methods to discover the appropriate care measure. There is a great variety of textile items with may different fibre contents and fibre mixture, with varying degrees of dimensional stability using many different dyeing processes coming from a variety of manufacturing establishments with quality control procedures which may be almost nil to very good.</p>	Ind Assn (1)	Noted. Agreed.
<p>12. Care treatments do not depend solely on the main fabric which composes the textile article. All components of the textile article must be taken into account e.g. other fibers, accessories, dyeing, finishing treatments and texture. Using care labels provides the consumer, launderer and drycleaner with care information he or she does not necessarily have. Generally the consumer does not have experience and technical support to decide on care treatment.</p>	Ind Assn (1)	Noted. Agreed.

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3 No care instructions - mandate fibre content only	Sector	ACCC response
<p>13. We believe the problem created by synthetics stated in the paper as addressed in the 60s and 70s has compounded. Technology has advanced considerably in 40 years. For example the increase in blending of fibres into one continuous filament and the use of recycled materials with natural fibres has added to the complexity of care labelling and made identification of materials more difficult to determine. The problem is much broader than simply one which was created by the introduction of synthetics. As previously stated all components of a garment including the finishing techniques must be taken into account.</p>	Ind Assn (1)	Noted. Agreed.
<p>14. The problem today is not in accessing garment care information which is widely available on the internet although discerning accurate information can be difficult. Rather a bigger problem lies in the identification of fibre content, all components of the product and the finishing techniques that have been applied. As the industry moves into a value added market encouraged by Government, finishing techniques are growing in popularity and provide a point of difference. Many of these treatments require very specific care instructions and can be irreversibly damaged in one misinformed attempt at cleaning. Finishes on components such as buttons and zips influence care instructions and treatments on thread will determine how garments are handled in manufacture e.g. in pressing.</p>	Ind Assn (1)	Noted. Agreed.

4 Maintain Status Quo	Sector	ACCC response
<p>1. We do not support the preliminary conclusion that the effort expended by industry to comply with the mandatory standard and by regulators to administer it is disproportionate to the net benefit achieved for the public by this regulation and unnecessarily restricts competition. To the contrary, care labelling is an underpinning legislation which impacts all aspects of the TCF supply chain and in turn the life of the product. Care labelling instruction should be based on objective rather than subjective criteria; all members of the apparel chain should be working together to optimize garment performance as new technologies emerge; and national and international organizations also need to work together. Australia is listed as a participating country on ISO Textiles Committee TC38 which oversees ISO/FDIS 3175 Professional care, dry cleaning and wet cleaning of fabrics and garments and ISO/FDIS 3758 Care Labelling Code Symbols. Information is needed by all stakeholders about what articles can be damaged by the combination of water, detergent, and mechanical action and what impact it has on air pollution associated with dry cleaning as well as water pollution concerns with wet cleaning. Eco-cleaning is also a strong movement gaining momentum and needs to be incorporated into any cleaning legislation. Formulation of amendments to care labelling legislation around these emerging trends and the ability to align with global initiatives will take time. Great care is needed to ensure that we are not solving one problem by creating other problems somewhere up or down the supply chain. The TCF industry has a vested interest in good care labelling and any modification of the care labelling rules requires great care and time for the industry to adjust. The Australian labelling system needs to harmonize with international labelling — one system is needed globally. All stakeholders need representation and in the future this needs to be expanded to include converters, importers, exporters and recyclers. Fabric care is a business and it has to succeed as a business offering today’s environmentally friendly alternatives. In the final analysis, all stakeholders really serve the same master—the consumer. Given the changing world for the textile industry, launderers, dry cleaners, and the consumer, working together will be the solution to solving the problem.</p>	Ind Assn (1)	Noted. Agreed.
<p>2. A skilful competent smaller company will be put out of business if they lose consumer confidence. If it is desirable to nurture and encourage small business then it is essential that the legislation stay in play. Small Business does not have the time to follow up on the problems that arise from incorrect or unlabelled products. The situation invariably arises that no-one wants to take responsibility for product failure.</p>	Ind Assn (1)	Noted. Agreed.

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4 Maintain Status Quo		Sector	ACCC response
3.	Mandatory regulation will insure that the consumer will be adequately informed as to the proper care of their garments to maintain and extend the life of those garments. It will also provide dry cleaners with the necessary information to properly maintain the customers' garments.	DC (4)	Noted. Agreed.
4.	New fabrics, mixes of fabrics and finishing methods. How does a dry cleaner or a consumer find out about those changes or variations? Only a strong, mandatory labelling system can ensure the exchange of product information and responsible notification of new materials.	DC (9)	Noted. Agreed.
5.	Manufacturer, wholesalers and garment cleaners will always benefit from a system that sets out to minimise ignorance, mistakes or poor products. This in turn ensures that consumers do get value for money and by virtue of the labelling of the garment, have a fair expectation as to how their purchase (garment) can be effectively cared for and maintained.	DC (9)	Noted. Agreed.
6.	With all our experience, it is difficult to tell a customer that their garment that they have paid a lot of money for cannot be cleaned as it has been made with dry clean only fabric and pleating with wash only beading etc. It does nothing for our reputation, let alone our hip pocket if the customer wishes us to try. If something goes wrong, we are the target for compensation, not the manufacturer.	DC (1)	Noted..
7.	Retain the current consumer product safety information standard AS/NZS 1957:1998 <i>Care Labelling of Clothing and Textile products</i> .	Retailer (2)	Noted..
8.	Current legislation has been a major success with the smaller number of complaints being a testament to that success.	Ind Assn (1)	Noted..
9.	We do not support any weakening of the current mandatory standard because clothing used by our personnel must withstand the necessary cleaning treatments and be labelled accordingly using the current mandatory standard. It is our opinion that Options 1, 2 & 3 proposed in Reference A (Draft RIS) do not support this position and it is for this reason that we do not support any of these options. We support Option 4 of maintaining the status quo.	Govt Dept	Noted. Agreed.
10.	All other options will not adequately protect consumers from unnecessary damage to garments and textiles from maintenance processes. Options 1 through 3 will force drycleaners and others service providers of fabric maintenance to disclaim responsibility for damage during their processes and/or refuse to take on the work.	DC (6)	Noted..

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4 Maintain Status Quo	Sector	ACCC response
11. Options 1-3 will also significantly increase the level of legal proceedings in my view. I believe the limited number of claims through the garment/textile manufacture and maintenance industries to ACC is a direct measure of the success of mandatory label requirements. Claim matters are largely dealt with between consumers, maintenance providers and manufacturers (via supply chain) because the rules are set and specific.	DC (6)	Noted. Agreed.
12. Care labelling has been a success that makes our job so much easier, the customers have benefited with more information at the time of purchase and the number of complaints has diminished. When we have had disputes, the structure provided by the legislation has made the resolution much easier. I have handled, on behalf of the association, complaints to Fair Trading and would think that the officers involved would also agree that resolution process has improved. Without this structure, complaints would become tied up in common law and be protracted and expensive, only the poor consumer will suffer.	DC (7)	Noted..
13. After comprehensive discussions with various manufacturers, test houses and consumer groups: This is the preferred option at Product Testing as we believe it provides consumers, drycleaners and manufacturers with a clear and concise mean of determining the correct care labelling for garments, to change would be to create confusion and inadequacies within the Australian market.	Test lab (2)	Noted..
14. I am a drycleaner with 39 years experience in the industry.... I own and operate two package plants and have worked and studied in England, the United States and Europe. With all this experience, I still refer to garments' labels on a daily basis at the counter with customers and use this information to discuss with the garments' owners how best to process the garment.	DC (7)	Noted..
15. We would support the retainment of the current consumer product safety information standard for Care labelling of clothing and textile products. However as discussed in response to Option 3, we would endorse the additional requirement for fibre content labelling on a Commonwealth level.	Retailer (1)	Noted..
16. It is important that the industry continues to have basic guidelines in respect to care labels. It provides information to the consumer about their purchase and may even influence their purchasing decision	DC (8)	Noted. Agreed.

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4 Maintain Status Quo		Sector	ACCC response
17.	Consumers should not have to resort to trial and error methods to discover the appropriate care measure. Nor should they suffer losses because suppliers provide inadequate or incorrect care instructions. The extra cost to Government in administering compliance and dispute resolution could only be described as a significant increase.	Ind Assn (1)	Noted. Agreed.
18.	The alternative to the legislative approval have been tried in many forms over many years and been found to be unsatisfactory. An enormous amount of time was wasted in adversarial discussion almost invariably with no satisfactory outcome. Under the current system this does not happen. If a garment has been properly tested and labelled it is a clear cut decision on how it should be cared for. Retailers and Care providers and Consumers have a valuable tool which helps eliminate unnecessary time wasting problems. Compliance costs and the paper burden on small business will be increased enormously if this legislation is not kept in place.	Ind Assn (1)	Noted. Agreed.
19.	The basic principles of English, legible? attached and accessible must stay in place but care should also remain mandatory.	Retailer (2)	Noted. Agreed.
20.	The cost is negligible as all developed countries require care labels. All major retailers have a quality control system in place and will not accept unlabelled non performing goods.	Ind Assn (1)	Noted..
21.	We strongly recommend not to remove care labels from clothing, on behalf of consumers and dry cleaners.	DC (1)	Noted..
22.	A care labels primary role is to provide direction on how to adequately and appropriately clean and care for textile articles by providing all the necessary information on washing, bleaching, ironing, dry cleaning and tumble drying. Without this information, it is difficult to determine the adequate and appropriate care treatment. Using care labels provides the consumer, launderer and drycleaner with care information he or she does not necessarily have. Generally the consumer does not have experience and technical support to decide on care treatment. Observing information provided on a care label avoids wrong treatments e.g. hot water instead of cold, washing instead of dry cleaning, unnecessary bleaching, hanging instead of tumble drying and consequent premature wearing out. Better results will be obtained and standards of care raised which avoid unnecessary and irreversible damage to either the garment and / or the environment.	Ind Assn (1)	Noted. Agreed.

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4 Maintain Status Quo	Sector	ACCC response
<p>23. We support the maintenance of the Care labelling of clothing and textile products standard based on Australian Standard AS/NZS 1957:1998 as varied by Consumer Protection Notice No. 16 of 2003. It believes it could be improved by recognising the benefits of new technologies for permanently attaching labels e.g. direct printing onto fabric; the changes occurring at point of sale e.g. opportunity to print care instructions on documents and the changes in market delivery brought about by internet selling e.g. of new and second hand garment. An understanding of the importance of care labelling to the supply chain needs to also be considered. Care labelling drives the design and development of product to meet a market which in turn influences price point.</p>	Ind Assn (1)	Noted. Agreed.
<p>24. Of the four options proposed no single one met with satisfactory solutions on all counts. Whilst the majority of support was for maintaining the status quo, there was some sentiment expressed that aspects of the legislation need to be reviewed where there is overlapping and confusion around dry and wet cleaning alternatives and where the merits for fibre identification only can be justified. So in short a combination of Options 2, 3 and 4 with an amendment to adopt the use of language and/or symbols (using the more wide spread global system that is most appropriate to our market/export potential) was supported. This last recommendation would reduce the need for relabelling of goods entering Australia from other markets and support our export potential.</p>	Ind Assn (1)	Noted..