



[From J. Cattaneo/GPI]

2/11/08

Janice Podell Frankle, Esq.  
Laura Koss, Esq.  
Bureau of Consumer Protection  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

Re: Notice of Forthcoming Comments – Proposed Revision of FTC Guides for the Use of Environmental Marketing Claims

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Dear Ms. Frankle and Ms. Koss:

The Glass Packaging Institute (GPI) is the trade association representing the North American glass container manufacturing and supplier industry. The members and associate members of GPI are vitally interested in promoting sound environmental and recycling policies, and in the use of clear and substantiated environmental marketing claims for packaging materials.

GPI concurs that it is both appropriate and necessary for the Commission to revisit and revise its Guides for the Use of Environmental Marketing Claims, 16 C.F.R. Part 260. Many of the terms then defined by the Commission properly should be updated and refined to reflect new meanings and uses of them since the last version of the Guides in 1996, and many additional terms currently used in environmental marketing claims, but not covered by the Guides, should now be defined and incorporated to avoid potential consumer confusion or deception.

While GPI has begun to survey its members and associate members with respect to proposed revisions and additions in terminology and coverage of the Guides, we have, unfortunately, not been able to receive complete responses and thus are unable to provide detailed comments at this time. GPI will, therefore, provide comments to the Commission as promptly as possible, and appreciates the Commission Staff's willingness to review and consider GPI's comments when filed as part of its evaluation of revision of the Guides.

Sincerely,

Joseph J. Cattaneo  
President  
Glass Packaging Institute

cc: Stephen Paul Mahinka  
Morgan, Lewis & Bockius, LLP  
Washington, D.C.