

January 10, 2023

*Submitted Electronically via Regulations.gov*

Federal Trade Commission  
Office of the Secretary  
600 Pennsylvania Avenue NW  
Washington, DC 20580

**Re: REQUEST FOR EXTENSION OF COMMENT PERIOD: Guides for the Use of Environmental Marketing Claims; Docket No. FTC-2022-0077**

To Whom It May Concern:

The undersigned organizations respectfully request that the U.S. Federal Trade Commission (FTC) extend the public comment period for Guides for the Use of Environmental Marketing Claims (“Green Guides” or the “Guides”)<sup>1</sup> by 60 days.

The FTC is seeking comments on the efficiency, costs, benefits, and regulatory impact of the Guides to determine whether to retain, modify, or rescind them. Our organizations appreciate the opportunity to provide comments and look forward to advising on specific aspects of the Guides on which the FTC is seeking input. While there was general awareness that the FTC would commence regulatory review of the guides sometime in 2022, it was unclear to stakeholders as to what substantive updates the Commission would be considering. It has been more than 10 years since the last update of the Guides, and the evolution and consumer relevance of environmental marketing practices over the last decade have been momentous. In order to provide FTC with fulsome and accurate responses to its request for information, especially with regard to consumer perception research, it will take additional time, resources, and evaluation by our respective organizations.

The timing of the submission deadline further complicates responses. Originally, Chair Kahn directed the Federal Register to publish the notice in mid-January of 2023. However, the notice was published on December 20th such that the open comment period has been unexpectedly interrupted by several major religious and holiday observances. Given that FTC’s revisiting of the Green Guides is a once-in-a-decade opportunity, we believe the extension of time is reasonable and appropriate.

Accordingly, our organizations respectfully request a 60-day extension on the comment period. Please do not hesitate to contact us if you have any questions regarding this request. Thank you for your consideration.

Sincerely,

American Beverage Association

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<sup>1</sup> 87 Fed. Reg. 77766 (Dec. 20, 2022).

American Chemistry Council  
American Cleaning Institute  
American Forest and Paper Association  
American Recyclable Plastic Bag Alliance  
Ameripen  
Association of National Advertisers  
Can Manufacturers Institute  
Consumer Brands Association  
Consumer Healthcare Products Association  
Consumer Technology Association  
Council for Responsible Nutrition  
Environmental Working Group  
Flexible Packaging Association  
Foodservice Packaging Institute  
Fragrance Creators Association  
Green Blue  
Healthcare Nutrition Council  
Household & Commercial Products Association  
How2Recycle  
Institute of Scrap Recycling Industries  
International Bottled Water Association  
National Retail Federation  
Paper Recycling Coalition  
Personal Care Products Council  
Petfood Institute  
Plastics Industry Association  
Plumbing Manufacturers International  
Printing United Alliance  
Retail Industry Leaders Association  
Ring Container Technologies  
Sealed Air  
Sustainable Packaging Coalition  
U.S. Chamber of Commerce

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