



Capital  
Regional  
District

22 October 2001

File No. 0580-86.03

Central  
Saanich

Colwood

Esquimalt

Highlands

Langford

Metchosin

North  
Saanich

Oak Bay

Saanich

Sidney

Sooke

Victoria

View  
Royal

Juan de  
Fuca (EA)

Outer Gulf  
Islands (EA)

Salt Spring  
Island (EA)

Suzanne MacPhee  
Competition Bureau  
17<sup>th</sup> Floor, Place du Portage I  
50 Victoria Street  
Hull, Quebec K1A 0C9

Dear Ms. MacPhee:

**RE: COMMENTS REGARDING PROPOSED NEW ENVIRONMENTAL LABELLING STANDARDS**

Thank you for providing Capital Regional District staff the opportunity to comment on the Commissioner of Competition's proposal to withdraw the current *Principles and Guidelines for Environmental Labelling and Advertising* and instead encourage the use of CAN/CSA-ISO 14021-00 standard *Environmental labels and declarations – Self-declared environmental claims*. I understand that the Commissioner proposes to utilize the new standard when evaluating environmental claims under the *Competition Act* and the *Consumer Packaging and Labelling Act*.

Overall, CRD staff find that the new standard is a comprehensive and thorough document. However, it is suggested that the standard may be improved in the following areas.

- Define the terms "reasonable size" and "reasonable proximity" in point (m) of section 5.7. This may avoid future potential conflicts with regard to the sufficiency of size and proximity of explanatory statements being placed on products.
- Similarly, the terms "conveniently available" and "reasonable proportion", which are used throughout the document, should also be defined where practicable. A number of B.C. Ministry of Water, Land and Air Protection stewardship regulations have defined such parameters.
- Since the new standard supports the use of the mobius loop to denote either being recyclable (section 7.7.3.3) or to contain recycled materials (section 7.8.3.5) it is recommended that the optional placement of an explanatory note regarding recycled content outlined in section 7.8.3.4 be made a requirement. Given the close similarity in the labelling, it is believed that an explanatory note would be needed to help the consumer to distinguish between recyclable and recycled content.

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Staff support the concept that consistent and verifiable environmental labelling will serve as an effective reminder of a product's environmental advantages and will help consumers to make informed product choices. I look forward to the completion and use of the proposed new standards.

Yours truly,

A handwritten signature in black ink, appearing to read 'A.W. Summers'.

A.W. Summers, P.Eng.  
Manager, Solid Waste Division

TW/wd

cc. Director Denise Blackwell, Chair CRD Environment Committee  
Michael Williams, General Manager, Environmental Services  
John Craveiro, Assistant Manager, Solid Waste Division  
Ann Johnston, Coordinator, Southern Gulf Islands Recycling Coalition