



MAYNE Island RECYCLING SOCIETY

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V0N 2J0
October 14, 2001

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Ms. Suzanne MacPhee
Competition Bureau
Place du Portage I
50 Victoria Street
Hull, Quebec, K1A 0C9

fax: 819-953-2557

Dear Ms. MacPhee:

The Mayne Island Recycling Society is in favour of the use of CAN/CSA-ISO 14021-00 standards for *Environmental Labels and Declarations*.

In particular, we are pleased to see that the concept of "waste reduction" is being expanded to include decreased "discharges to air and water as well as solid waste" [7.13.1] We agree that claims to reduced resource use should be based on "all relevant aspects of the product life cycle in order to identify the potential for one impact to be increased in the process of decreasing another." (italics mine) [5.7 h); 7.8.1.2]

We also enthusiastically endorse the limitation on claims to "Pre-consumer material". [7.8.1.1. a) 1)] This will make a significant reduction in claims of "recycled content". It may well put the 50% reduction claimed in 1996 by NaPP well below that goal.

In addition, we are in favour of the proposed:

- elimination of the phrase "... where facilities exist" and the requirement that there be a statement that a "qualified claim shall adequately convey the limited availability of collection facilities". [7.2.2.4; 7.7.2, etc.]
- elimination of claims to "sustainability" for the reasons given. [5.5]

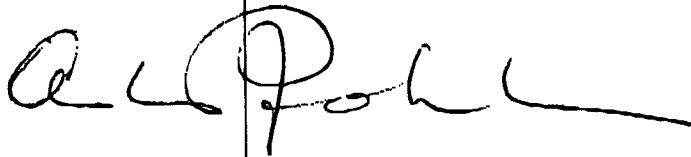
We like the reference to "explanatory statements" in the discussion of the Mobius loop. [5.7 m)] We also would like to see the words "recycled content" included with the percentage value. [7.8.3.4] There should be standardized location(s) for the placement of the Mobius loop on products and packaging.

We are uncertain what is meant by "claim of '... free'" shall mean no more than "an acknowledged trace contaminant." (italics mine) [5.4] By whom and where is the trace contaminant to be 'acknowledged'?



Genetic modification of foods has serious environmental impact. It should be mandatory to include labels and/or declarations with all GM products.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Ann W. Johnston', written in a cursive style.

**Ann W. Johnston
Chair, External Affairs Committee**

**cc.: Ms. Pat Seebach, President, Mayne Island Recycling Society
Ms. Denise Blackwell, Chair, Environment Committee, Capital Regional District
Mr. Richard Dalon, Outer Gulf Islands Director, CRD**