

## ***Southern Gulf Islands Recycling Coalition***

C11 Bluff Way  
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V0N 2J0  
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Ms. Suzanne MacPhee  
Competition Bureau  
Place du Portage I  
50 Victoria Street  
Hull, Quebec, K1A 0C9

[macphee.suzanne@ic.gc.ca](mailto:macphee.suzanne@ic.gc.ca)

Dear Ms. MacPhee:

The Southern Gulf Islands Recycling Coalition is in favour of the use of CAN/CSA-ISO 14021-00 standards in *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]

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.]
- limitation on claims to "Pre-consumer material". [7.8.1.1. a) 1)] This will make significant reduction in claims of "recycled content".
- elimination of claims to "sustainability" for the reasons given.

We like the reference to "explanatory statements" in the discussion of the Mobius loop. [5.7 m)] We 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 when it is said that "claim of '... free'" shall mean no more than "an *acknowledged* trace contaminant." (italics mine) [5.4]

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,



**Ann W. Johnston**  
Coordinator

cc.: **Ms. Denise Blackwell, Chair, Environment Committee, Capital Regional District**  
**Mr. Craig Foster, President, Recycling Council of British Columbia**  
**Mr. Leonard Fraser, Co-Chair, Waste, Health & Toxics Caucus, British Columbia**  
**Environmental Network**  
**Ms. Shelley Easthope, President, Pender Island Recycling Society**  
**Ms. Pat Seebach, President, Mayne Island Recycling Coalition**  
**Mr. Dave Parent, Coordinator, Galiano Island Recycling Resources**  
**Ms. Margaret Bray, Chair, Recycling Committee, Saturna Island Community Association**  
**Mr. Peter Grant, Manager, Recycling Depot, Salt Spring Island Community Association**