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Dear Ms. Audet:

Thank you for the opportunity to comment on the guidance document *PLUS 14021 Environmental claims: A guide for Industry and advertisers*. As a leading environmental marketing firm and managers of the EcoLogo^M program we take a keen interest in the document. After reviewing the document, TerraChoice would like to take this opportunity to submit some comments to the Competition Bureau. The following is a list of suggested changes including recommended rationale and revisions.

1. The title and introduction, since very general and non-specific, could easily mislead the reader into thinking that this guide covers *all* environmental information systems. Therefore, it is proposed that the title become instead, **Self-Declared 14021 Environmental claims: A guide for Industry and advertisers**.
2. The previous 1993 guide was found to be more far-reaching and included reference to the Canadian Environmental Choice Program (EcoLogo^M program). Is this guide intended to address the same scope, or more narrowly defined self declared claims?
3. The sequencing of the information in this guide could leave the reader with the impression that only self declared environmental claims are of value and of interest to suppliers and the WTO, and the only option available to suppliers. This is clearly far too limited an approach, and is fundamentally incorrect (please see suggested changes in point #4).
4. Section 1.2, being very informative, would have more of an impact if stated in the introduction. Therefore, the recommended introduction should begin with section 1.2 and incorporate the following additions derived from points #2, 3 above:



1 Introduction

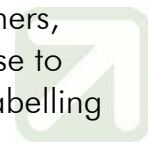
(Section 1.2 moved to Section 1) The demand for environmental information on consumer products has been growing since the late 1970's. In response, countries have developed various schemes and systems for assessing and communicating environmental product information. In 1992, the concept of environmental labelling was endorsed by participating governments at the United Nations Conference on Environment and Development (UNCED) to, "encourage expansion of environmental labelling and other environmentally related product information programmes designed to assist consumers to make informed choices".

In 1993, ISO established a technical committee to develop international environmental labelling standards. These standards are intended to incorporate requirements for consistency and accuracy and create fair competition in the marketplace.

(Insert this paragraph) In 1994, the Global Ecolabelling Network was created as a forum for information exchange and cooperation between national and regional ecolabelling programs (www.gen.gr.jp). Today almost thirty national and regional ecolabelling programs are members, including the Canadian Environmental Choice (or EcoLogo) Program (www.environmentalchoice.com).

Environmental labelling, based on international standards, is recognized as an effective instrument of environmental policy by the World Trade Organization (WTO) secretariat provided that it does not lead to unfair trade (see WTO web page on environmental labelling: www.wto.org/english/tratop_e/envir_e/envir_backgrnd_e/c3s2_e.htm#are_eco_labels).

(Current Introduction following) Similarly, Canadian consumers are becoming increasingly concerned about the environmental performance of products. For example, consumers are concerned about the resources and energy used to produce products, and about the sustainability of the product design (can it be reused or recycled? is it biodegradable? is it made of recycled materials?) among other issues. This has led to an increased demand for environmental information from consumers, government and industry about products. Industries may choose to communicate environmental benefits through environmental labelling



and use advertising vehicles to promote these benefits. There are a wide range of descriptors, logos, vignettes and other representations used to describe or imply environmental claims for consumer products. This means of communicating environmental claims is often called "green marketing".

Environmental claims allow consumers to more easily differentiate between products in the market so consumers can make better purchasing decisions in relation to the environment. In turn, consumer's purchasing power for such products is a market driver for business to invest in more sustainable environmental practices. **(Insert this additional paragraph)** Environmental information or ecolabels have a number of characteristics that allow the receiver to distinguish one kind from another. Ecolabels could be:

- (i) self or third party managed;
- (ii) self declared or independently verified;
- (iii) based on the product life cycle or a single issue;
- (iv) available for single or multiple sectors;
- (v) designed to demonstrate environmental leadership, relative performance or just information.

~~However,~~ The value of environmental claims rests on the assurance that the information provided is credible, objective, easily identifiable and understood.

Standards play an important role in providing guidance to ensure responsible claims in industry and advertising. Standards for environmental claims benefit consumers, industry, and advertisers by providing a level playing field, consistency in terms and application, as well as providing continual improvement through the maintenance of a standards program that is updated as environmental practices and scientific information evolve. **(Insert text)** The 14020 series of standards has been developed to help in this regard.

ISO 14024 describes Type I ecolabels which, based on the characteristics above are:

- (i) third party managed;
- (ii) independently (third party) verified;
- (iii) based on the product's life cycle;
- (iv) available for many product types and sectors;
- (v) designed to demonstrate environmental leadership (best 20% or so in class).



Canada's national Type I eco-labelling program - the EcoLogo program (www.ecologo.org) was introduced by the Government of Canada in 1988.

The majority of information contained in this Guide is drawn **(Change to be more specific)** from one of the International Standards Organization's ISO 14020 series, ISO 14021 Environmental labels and declarations — **Self-declared environmental claims (Type II environmental labelling)**, and will be used for evaluating compliance with Canadian regulations. **(Insert text)** Type II ecolabels, based on the characteristics above, are typically:

- (i) self managed by the claimant;
- (ii) not independently verified;
- (iii) based on one or two environmental attributes (eg recycled content, toxicity)
- (iv) used for one product or for products from one supplier, manufacturer or distributor;
- (v) designed to provide information, not demonstrate environmental leadership.

Other labelling standards form part of the ISO labelling series. For summaries of these see Annex A of this Guide.

ISO 14021: Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling) was published in 1999. This standard was reaffirmed in 2004 and is scheduled to be reviewed for the next standards development cycle for a new edition in 2008.

ISO 14021 has been translated into several languages in addition to the official languages of ISO (English, French and Russian) and is widely used as a voluntary and regulated standard. In 2000, ISO 14021 was adopted by the Canadian Standards Association (CSA) as CAN/CSA-ISO 14021.

Since Section 1.2 is moved to the beginning, Section 1.3 will become 1.2 and so on.



Thank you for allowing TerraChoice to participate in the reviewing of this document. We hope that the above recommendations will prove helpful. Please contact us should you find that anything is unclear.

Regards,



Stewart Fast
Researcher
TerraChoice Environmental Marketing

