



June 15th, 2007

Ms Diane Audet
Competition Bureau
50 Victoria St
Gatineau QC K1A 0C9

Via email: audet.diane@cb-bc.gc.ca

Re: Public consultation on Environmental claims: A guide for industry and advertisers

Dear Ms Audet:

Refreshments Canada and its members appreciate the opportunity to submit our comments regarding the draft CSA 'PLUS 14021' Environmental claims: A guide for industry and advertisers (the 'Guide') and the apparent Competition Bureau (the 'Bureau') proposal to use it in place of the currently used Principles and Guidelines for Environmental Labelling and Advertising (the 'PGELA').

We also thank you for providing the extension to June 15th 2007 for Refreshments Canada and its members to submit comments on the Proposal, given that we had only learned of the Bureau's consultation and proposal at the beginning of June.

Who we are

Refreshments Canada is the premier trade association representing the broad spectrum of brands and companies that manufacture and distribute the majority of non-alcoholic refreshment beverages consumed in Canada. We represent more than 40 brands of juices, juice drinks, bottled waters, sports drinks, ready-to-serve teas and coffees, new-alternative beverages, carbonated soft drinks, energy drinks and other non-alcoholic beverages.

The refreshment beverage industry currently generates some \$5 billion annually in retail sales. The industry has more than 120 manufacturing, distribution and sales facilities, spread across every region in Canada. The industry directly employs 12,000 Canadians with an annual payroll of \$500 million, and indirectly contributes to thousands of other jobs.

The context of our comments

Refreshments Canada and its members are committed and involved corporate citizens and care deeply about Canada and the protection of our environment for Canadians – both present and future generations. We are proud to do our part in supporting efficient, cost-effective systems that enable Canadians to divert beverage packaging through comprehensive materials recovery systems.

The refreshment beverage industry has historically been at the forefront of efforts around the 3Rs – reduction, reuse and recycling. Our industry was a founding partner (along with the province and municipalities) in the establishment of Ontario's world-renown Blue Box curbside recycling system. Refreshments Canada was a member of the National Task Force on Packaging, and the CSA Technical Committee on Environmental Labelling. Refreshments Canada and its members actively participate on Boards and Committees of various environmental stewardship organizations right across Canada.

.../2

Many of our member companies use self-declared environmental claims to provide consumers with important information about the environmental benefits of particular products and packaging. We recognize that environmental claims need to be truthful and credible in order to provide consumers the ability to make informed choices. Refreshments Canada supports having a consistent set of guidelines designed that provide industry with clear guidance regarding environmental claims. Our industry sector (and Canadian industry in general) has been using Industry Canada's Principles and Guidelines for Environmental Labelling and Advertising (PGELA) since their development in the early 1990s.

Comments regarding process

Refreshments Canada endorses the use of a consultative approach regarding any changes the Competition Bureau might be contemplating.

We are therefore disappointed that the Bureau had not consulted directly with Refreshments Canada in the development of this apparent proposal to replace the current PGELA with the draft CSA Guide. We further note that the Canadian Standards Association did not consult with Refreshments Canada either regarding such a proposal. Neither was Refreshments Canada consulted regarding the Bureau's apparent previous proposal to replace the PGELA back in 2001.

Like quite a few others we are aware of, Refreshments Canada only learned about the Bureau's proposal from other industry colleagues – and about a week before the deadline for comments. We suspect that there are likely many other stakeholders that would be interested in commenting on any proposal to replace the PGELA, *but those other stakeholders can only provide those comments if they are actually properly informed about the Bureau's proposal and consultation process.*

As noted in the section above, Refreshments Canada and its members have considerable expertise in environmental stewardship and can add value to the Bureau's process of evaluating the current relevancy of the PGELA.

We thus respectfully request the opportunity for all stakeholders – including the refreshment beverage industry – to have a fulsome discussion of the implications of any proposal to replace the PGELA, so that our perspectives and concerns (and those of others) can be understood and addressed before the Bureau proceeds with any contemplated changes.

Over-arching comments regarding the Proposal

The March 8th 2007 notice posted on the Bureau's website states that

"The purpose of this guide is to provide assistance to industry and advertisers in complying with the provisions of the Competition Act, the Consumer Packaging and Labelling Act and the Textile Labelling Act."

The notice further notes that

"The guide is a collaborative effort by the Competition Bureau and the Canadian Standards Association (CSA) to revise an existing CSA guidance document on environmental labelling (ISO 14021 Essentials). This new publication will provide industry with explanations on how to apply CSA's National Standard of Canada on environmental labels and declarations, CAN/CSA-ISO 14021-00, as well as how to comply with the provisions of the laws administered by the Competition Bureau that address false and misleading representations."

We respectfully submit that the two stated purposes of the Guide – (1) how to apply ISO 14021; and (2) complying with laws concerning false and misleading representations – are not one and the same.

ISO 14021 is an international standard that was written to encompass perspectives of various countries around the ISO negotiating table. It may be helpful to those exporting goods to other countries. What the Bureau and Canadian industry need, however, is a document that helps everyone understand what is needed to comply with Canadian law concerning environmental labelling and advertising.

As such we do not believe that one document can fulfil both functions.

We also note from the Bureau's website that it had undertaken a consultation back in 2001 for a similar proposal to replace the PGELA with a CSA-authored 'Guide' [Refreshments Canada was neither notified nor consulted on the 2001 proposal, either]. At that time a number of respondents questioned the need for replacing the PGELA at all. The Bureau does not appear to have prepared a summary report concerning the 2001 consultation. Given that the Bureau is still using the 1994 version of the PGELA it would appear that the Bureau decided not to move forward with the 2001 proposal.

The Bureau has not provided any evidence that there are an inordinate number of complaints concerning false or misleading environmental labelling or advertising, nor do we believe that the Bureau has received many.

The current (1994) PGELA has been in use for more than a decade. It is well understood by industry, and provides a solid basis for making appropriate environmental claims. The PGELA actually provides more clarity around important issues (such as minimum threshold values for availability of recycling services, and the use of the Mobius loop symbol) than is found in the proposed Guide.

We respectfully suggest, therefore, that there is no need to replace the PGELA with the proposed new Guide.

Comments specific to the proposed Guide

Given our contention that the proposed Guide has no place replacing the current PGELA, we are not able to fully comply with the Bureau's request to "Please identify the relevant clause number in the Guide where changes are being suggested along with the rationale and suggested wording."

Instead the following section elaborates on just some of our comments/concerns respecting the proposed Guide, referenced to the applicable sections of that draft document.

Legal Notice

"CSA makes no representations or warranties regarding this document's compliance with any applicable statute, rule, or regulation."

We agree that the proposed Guide does not reflect the Canadian context of environmental statutes, regulations, stewardship programs and labelling requirements, and as such should have no application for assessing compliance with the provisions of the Competition Act , the Consumer Packaging and Labelling Act and the Textile Labelling Act.

Preface

“The first objective of this Guide is to provide the users of ISO Standard 14021, Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling), with a practical guide to the application of the Standard...”

We agree that CSA seems to have authored a Guide for using ISO 14021.

“Adherence to the advice contained in this Guide will enhance the provision of meaningful information to consumers...”

We disagree. Having to follow the advice in the draft Guide would lead most manufacturers to drop any and all environmental claims from their labels, leaving consumers with a dearth of information for making informed purchasing decisions.

“will serve both as an aid to interpreting the ISO 14021 Standard and as a guide to complying with the provisions of the above statutes that prohibit false or misleading representations.”

We disagree. We contend that the two objectives are mutually exclusive, and as such one document cannot achieve both purposes.

We contend that the PGELA has served industry and the Bureau well for more than a decade, and provides appropriate context for assessing compliance with the various Acts.

If the Bureau were to make this Guide its ‘compliance’ yardstick, however, its excessively onerous requirements (especially for disclosure would likely virtually eliminate all environmental labelling in Canada.

1 Introduction

“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.”

We agree, and note that for over two decades, industry has been providing Canadian consumers with information helping them understand both the environmental attributes of products and how consumers can responsibly manage the product/packaging after use.

“The majority of information contained in this Guide is drawn from the International Standards Organization’s ISO 14021 Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling),”

We agree that CSA seems to have derived most of the information from the ISO standard. The referenced ISO standard may play a role in assisting manufacturers that are exporting goods to other countries, but neither the ISO standard nor the draft Guide reflect the Canadian context of the products and packaging sold/used in Canada and North America.

2...Applicable Acts

“Ultimately, the relevant statutes administered by the Competition Bureau will be applied in assessing the appropriateness of an environmental claim. A comprehensive case by case examination of all aspects of representations will form the basis of any enforcement and/or compliance action under the appropriate legislation.”

We agree that the Bureau should assess appropriateness of any environmental claim based on the relevant statutes.

“This guidance document will be used as a reference for evaluating environmental claims in the application of the Competition Act, Consumer Packaging and Labelling Act and the Textiles Labelling Act.”

We disagree with the proposal to use the draft Guide as a reference for evaluating environmental claims, as the document’s requirements do not reflect the Canadian context.

3 Overall considerations

“ISO 14021 emphasizes in its introduction, that while self-declared environmental claims do not require third-party verification of supporting data, the data must be available and accurate. The purpose of voluntary standards is to facilitate inter-provincial and international trade; therefore, it is essential that environmental claims following the ISO Standard are verifiable.”

The above passage out of the draft Guide itself points out that ISO standards are meant to facilitate international trade. What the Guide and related ISO standard do not do, however, is reflect the Canadian context of environmental stewardship and labelling.

4.3 Specifics of ISO 14021

“l) shall only relate to an environmental aspect that either exists or is likely to be realized, during the life of the product;”

We agree that environmental labels should address aspects or conditions that either currently exist or are likely to exist during the life of the product and/or packaging. This is an important aspect that has significance concerning the use of the phrase “where facilities exist”.

“p) shall not be made where they are based on the absence of ingredients or features which have never been associated with the product category;”

We agree that environmental labels should be related to the product category. This is an important aspect that has significance concerning the use of the phrase “...-free”.

4.5 Claims of “...free”

“Claims of “... free” must not be made based on the absence of ingredients that were never in a product”

We disagree. The “...free” claim should be permitted if the “...” condition exists or previously existed in the product category (i.e. the criteria is the category, not the product). There are also appropriate uses of the “...free” claim when comparing one sub-category to another (e.g. organic foods are “pesticide free” versus conventionally produced foods).

We also note that regulations under the Food and Drug Act (FDA) clearly define the use of "...free" claims regarding the attributes of foods and their ingredients. The FDA allows the use of a "...free" claim provided the criteria for such a claim is met.

We contend that "...free" claims should continue to be allowable. The Bureau always has the option of asking the brandowner making the claim to provide rationale/evidence to validate the appropriateness of the claim.

5.3

"Verification material must be available to both the purchaser and a potential purchaser as such material may be required to effect purchasing decisions. It is not necessary to have all data produced or verified by a third party, but it must be accurate and available in a readily understood form."

We disagree that material information be provided to the end purchaser.

Making verification material/data available to everyone is well beyond current advertising claim requirements, even in sensitive areas such as healthcare. We must point out that if there is a risk of confidential/proprietary information being released to competitors and consumers, manufacturers will be less likely to use environmental claims. The end result would be depriving consumers of the ability to make informed choices.

While we agree that any environmental claim must be accurate and not misleading, any claim/data verification should only take place between the Bureau and the brandowner so that any proprietary information can be appropriately safeguarded. Such information must also be protected as confidential regarding any 'Access to Information' requests.

5.5

"if that claim is not relevant to the whole product or the product and the package, the claim must clearly identify exactly which parts of the product, package, or service to which it refers."

We disagree with this blanket statement. Such a condition should only apply if it is not readily obvious to the purchaser.

5.16

We note that the quoted ISO clause 5.7(o) actually says that a claim can be made regarding a previously undisclosed aspect, but it and the follow-up paragraph suggest the claim has to make clear the aspect is not the result of a recent change.

This unfairly discriminates against the products that have always had a lower environmental impact in favour of those late to the game. E.g. a laundry detergent which until recently contained phosphates can claim 'phosphate-free', yet a competing detergent that has never contained phosphates must find room on the label to state that 'this product has never contained phosphates'.

The unintended but likely consequences of this section would be that consumers get deprived of relevant information that would otherwise enable them to make a more informed decision, and a competitive advantage is created for the product that had the attribute/ingredient until recently over a similar product that never contained it.

5.17

The example given demonstrates why ISO 14021 is not relevant to the Canadian context. In fact, the product *category* is hair sprays (not pump hair sprays), and the reality is that some such products contain aerosol propellants that may impact the ozone layer or be greenhouse gases (GHG) that impact the atmospheric layer and thus climate change.

Again, the unintended but likely consequences of this section would be that consumers get deprived of relevant information that would otherwise enable them to make a more informed decision, and a competitive advantage is created for the product that had the attribute/ingredient until recently over a similar product that never contained it.

6 Symbols

6.1 General

“The only specific symbol addressed in ISO 14021 is the Mobius loop.”

While we acknowledge that ISO 14021 does address the Mobius loop, we point out that it does so in conflict with the current PGELA, and the greater North American context of its use.

6.2 Use of symbols for different environmental claims

“Symbols used for one type of environmental claim should be easily distinguishable from other symbols, including symbols for other environmental claims.”

We must point out that ISO 14021 essentially contradicts itself, as here the Standard and Guide state that the symbol for one environmental claim must be distinguishable from other symbols, while elsewhere they call for the interchangeable use of the Mobius loop between recyclability and recycled content claims.

We further note that the current PGELA correctly points out that one type of Mobius loop is used to designate recyclability, while the Mobius loop with the dark (or reverse colour) background is used in conjunction with a percentage to denote recycled content.

6.5 Other information or claims

We disagree with the example given. The plastic resin coding information incorporating a Mobius loop would be perfectly legitimate on the label of something like a yogurt cup made out of a High-Density PolyEthylene (HDPE) #2, as this type of plastic is recyclable in most curbside recycling programs across Canada.

7 The Mobius loop

“Any three versions of the Mobius loop shown above can be used to mean either recycled content or recyclability of the product,”

We disagree.

As noted above, this direction by the draft Guide is in direct contravention of the requirements under the current PGELA.

The PGELA clearly shows that the Mobius loop without a reverse background is used to denote ‘recyclable’, whereas the Mobius loop on a dark (or reverse colour) background denotes ‘recycled content’.

The PGELA further notes the importance of indicating recyclability on products/packaging, as *“claims of recyclability may assist consumers in making choices which will ensure the availability of materials for recycling facilities”* and that use of the Mobius loop will *“provide an impetus to increase the development of appropriate infrastructures for recycling”*.

As proposed the draft Guide would severely limit the use of the Mobius loop and recycling claims. This would in turn hinder the ongoing viability of existing recycling infrastructure as well as the expansion of such infrastructure to encompass more areas and a broader range of materials.

Plastic resin codes

We also note that most plastic containers carry a specific ‘resin code’ that uses the Mobius Loop in conjunction with a number that designates the type of plastic resin used in the container. These codes are generally found on the bottom of a container. This system of identifying plastic containers has been widely used in North America for many years. Canadian municipalities reference the code in their advice to consumers about the types of plastic containers/packaging accepted in their communities local recycling program.

It is not clear if this practice will be allowed to continue because the use of plastic resin codes is not discussed in the Guide.

Discontinuing use of the plastic resin codes using the Mobius loop would have the unintentional result of allowable recyclable plastics potentially not being recycled and alternatively, non-recyclable plastics probably contaminating the recyclable waste stream. In both instance, the resulting consumer confusion would result in more materials ending up being disposed in landfills, which runs contrary to the purpose of environmental claims in the first place.

The Bureau should thus allow continued use of the existing plastic resin coding system that incorporates the Mobius loop.

8 Evaluations and claim verification

8.1 Responsibilities of the claimant

“the data must be produced using accepted methods to enable purchasers and potential purchasers to verify the claim.”

We disagree. As noted above, verifying a claim is only between the claimant and the Bureau (which is responsible for addressing false or misleading representations).

8.2 Selection of evaluation and claim verification methods

“The Bibliography of ISO 14021 ... lists several widely acceptable tests for verifying some of the claims defined in ISO 14021.”

Again we note that this Guide addresses compliance with ISO 14021. It should be up to the Bureau to decide if the tests used are acceptable for verifying the claim.

8.3 Access to information

“A claim that depends on confidential information for its verification will require third party audits to confirm that the data presented supports its validity.”

We disagree.

While we agree that any environmental claim must be accurate and not misleading, we again note that any claim/data verification should only take place between the Bureau and the brandowner so that any proprietary information can be appropriately safeguarded.

Any proprietary information disclosed to the Bureau in the process of validating an environmental claim must also be protected as confidential regarding any 'Access to Information' requests.

10.1.2 Claims of “where facilities exist”

“For claims of recyclable and reusable and refillable, systems and facilities will always be required. Further, systems or facilities must be conveniently available to a reasonable portion of purchasers and potential purchasers in the area which product is to be sold. It is not considered adequate to state “where facilities exist” after a claim which is dependent on the existence of such facilities.”

We note that the draft Guide provides absolutely no direction whatsoever on what is meant by “conveniently available” or “reasonable portion of purchasers”. This is in stark contrast to the current PGELA, which provides clear direction that

“Where a material or product is being recycled, and one third of the population has access to collection facilities for that material or product, a claim of recyclability may be made if the claim is qualified by an explanatory statement. Example... 2. ‘Where facilities exist’.”

We further point out that in Canada waste management and recycling legislation/ regulation/ policies are a provincial jurisdiction, while decisions about the type of recycling services provided – and more specifically what materials are collected – are made by each of the 1,000+ local municipalities across Canada that have recycling programs.

Manufacturers make and label products for sale across multiple jurisdictions in Canada. It would be neither practical nor feasible for manufacturers to develop packaging labels that are specific to individual and local recycling programs across the country. Logistically it would be near impossible – as well as cost-prohibitive – for labels to reflect constantly evolving local recycling programs. In addition, there would not be enough room on the label to provide the kind of regionally specific information deemed appropriate by the Guide.

Requiring manufacturers to provide regionally specific information would likely result in decisions to delete recyclability claims entirely, depriving consumers the ability to make environmentally informed decisions – surely an unintended consequence of this Guide.

Consumers need to understand their own municipalities determine what materials are recyclable in their area, and that by checking in with their municipality they can encourage the addition of new packaging and materials to their community’s list of recyclable materials acceptable in their local program.

We contend that the statement, “Recyclable where facilities exist” should continue to be allowed based on the current criteria in the PGELA.

10.2.2 Qualifications

*“Discouraged
This package is compostable where municipal facilities exist.”*

We disagree with the implications of the above example.

As noted above, programs vary by municipality and by province. As such it is totally impractical for a nationally distributed product or package to be labelled so that it specifically identifies the municipalities where that material is compostable.

Again, the current PGELA provides clear direction on the requirements are for reasonable access to composting facilities.

10.7 Recyclable

10.7.1 Usage of term

"It is not adequate just to have municipal or industry collection systems to make a claim of "recyclable" — there must also be facilities to process the collected materials and reuse them as an input to another product that can be marketed and used"

We disagree. As previously noted above, there is a wide variability between municipal recycling programs, how they process the collected materials, and who they market them to.

It is impractical to put the onus on brandowners to verify that municipalities properly process collected materials and that those materials are then used as an input to another product or process. Imposing such an onus on brandowners would likely result in manufacturers simply not putting any environmental information on their labels.

Consumers are the ones ultimately responsible for all important end-of-life decisions about whether to quickly dispose, store or recycle a particular product and/or package.

Providing consumers with absolutely no information regarding environmental aspects of the product/package – e.g. whether the product/packaging is recyclable – would be a disservice to consumers, and no doubt have a net negative impact on the environment.

10.7.2 Qualifications

"c) Generalized qualifications, such as "Recyclable where facilities exist", which do not convey the limited availability of collection facilities are not adequate."

We disagree. The purpose of environmental claims includes educating the consumer about the potential to divert materials via recycling programs. If recycling facilities exist in some locales and not others, the qualified claim should be allowed. The draft Guide does not.

In contrast, the current PGELA clearly defines when a claim of recyclability is acceptable:

"A claim of recyclability is reasonably justified if at least one third (1/3) of the population in the area where the product is distributed has convenient access to collection or drop-off facilities for recycling. Calculation of the threshold figure will depend on the expected product distribution (e.g.: approximately 9 million for a nationally distributed product, or.."

10.8 Recycled content

10.8.3 Use of a symbol

As noted in section 7 above, the draft Guide's direction that "Any three versions of the Mobius loop shown above can be used to mean either recycled content or recyclability of the product" is in direct contravention of the requirements under the current PGELA.

The PGELA clearly shows that the Mobius loop on a dark (or reverse colour) background denotes 'recycled content'.

The proposed Guide also suggests that the percentage of recycled material can be indicated in numbers adjacent to the Mobius loop, whereas the PGELA directs that the percentage number be inside the Mobius loop (if adjacent to the symbol, the percentage is conveyed in words, e.g. "30% recycled content").

10.10 Reduced resource use

10.10.1 Usage of term

"Clause 5.7 (h) of ISO 14021 should receive special attention when making resource use claims, so that all the environmental impacts throughout the product life cycle are taken into consideration."

It is impractical to put the onus on brandowners to determine all of environmental impacts throughout the product lifecycle to see if there are any negative impacts from a reduced resource use at their point in the product chain. Such a requirement would virtually eliminate any claims being made about reduced resource use.

The current PGELA is much more concise in defining how and when source reduction claims are appropriate.

"When a resource reduction has been achieved, for an initial twelve-month period, a claim may be based on an estimated calculation of reduced resource based on the design or distribution of products or production process."

We disagree with the proposed Guide's apparent suggestion that source reduction claims can only be made for a 12-month period.

Manufacturers face pressure on a periodic basis regarding the reduction of their packaging. In many cases, manufacturers need to be able to re-educate the public and politicians that they have already made significant achievements in source reduction a number of years ago, and are approaching or at the limits of being able to make any further reductions.

10.12 Reusable and refillable

10.12.2 Qualifications

"Facilities for servicing refillable products must be conveniently available to a reasonable portion of purchasers or potential purchasers in the area in which the product is sold"

As noted in section 10.1.2 above, the draft Guide provides no direction whatsoever on what is meant by "conveniently available" or "reasonable portion of purchasers".

This is in stark contrast to the current PGELA, which provides clear direction.

10.13 Waste reduction

10.13.1 Usage of term

"This claim can be made if there is a reduction in the water content of solid waste or if there is a reduction in the mass of waste due to a waste treatment process"

We agree that processes such as thermal 'energy-from-waste' recovery/treatment should be considered a valid form of waste diversion. While the process does result in a reduction of the waste disposed, we suggest that it is actually more an alternative diversion method rather than true source reduction.

Annex B: Principles for all environmental labels and declarations

“(8) The process of developing environmental labels and declarations should include an open, participatory consultation with interested parties. Reasonable efforts should be made to achieve a consensus throughout the process.”

We respectfully suggest that the Bureau and CSA apply this principle of “open, participatory consultation with interested parties” to the process of assessing the merits of the current PGELA and the proposed Guide.

The beverage industry use of environmental claims

All beverage containers are universally recyclable throughout Canada, through the various curbside and drop-off depot multi-material recycling programs. As such our members are justified in labelling beverage containers with the claim ‘recyclable’ and the Mobius loop symbol (without any qualifying statements). Our members also include the commercial statement ‘Return for refund where applicable’ in compliance with deposit/return systems mandated in some jurisdictions.

In conclusion

The above sections highlight just some of the concerns we have identified in the brief time we have had to assess the Proposal. There are other areas/aspects that we have not been able to fully assess yet. We can, however, already make some recommendations.

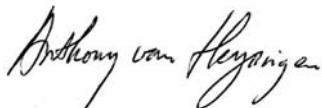
In response to the Competition Bureau’s current consultation, we recommend that:

- The Bureau continue to use the current PGELA for evaluating compliance with the provisions of the Competition Act, the Consumer Packaging and Labelling Act and the Textile Labelling Act concerning environmental claims.
- The Bureau abandon the proposal to replace the PGELA with the CSA-authored Guide.
- The CSA be directed to delete any references in the CSA’s draft Guide concerning their Guide being “used for evaluating compliance with Canadian regulations” or legislation.

We again extend our appreciation for this opportunity to comment on the draft CSA document ‘PLUS 14021’ Environmental claims: A guide for industry and advertisers.

We would welcome the opportunity to further discuss our comments and concerns with you, and look forward to working together with the Bureau in maintaining a compliance framework that will foster Canadian consumer knowledge while protecting against false or misleading environmental claims.

Sincerely,



Anthony van Heyningen
Executive Director
Refreshments Canada
Email: anthony@refreshments.ca

cc. The Honourable Maxime Bernier, Minister of Industry

AVH: 2007/06/15 Labelling env 2007 consult CompBureau RCltr20070615 submission to AudetD.doc