



Environment
and Labour
Office of the Minister

PO Box 697
Halifax, Nova Scotia
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Our File Number:
10700-40

APR 16 2007

Raymond Pierce
Deputy Commissioner
Fair Business Practices Branch
Place du Portage 1
50, rue Victoria
Gatineau, QC K1A 0C9

Dear Mr. Pierce:

Thank you for inviting Nova Scotia Environment and Labour to provide comments on the draft publication "Environmental Claims - A Guide of Industry and Advertisers".

The document has been provided to Solveig Madsen, Pollution Prevention Branch of Nova Scotia Environment and Labour, for review and comment. If necessary, she can be contacted at 902.424.2173 or madsensf@gov.ns.ca.

Sincerely,

A handwritten signature in black ink that reads "Mark Parent".

Mark Parent
Minister

Ochmann St-Jean, Romy: #CB - BC

From: Solveig F Madsen [madsensf@gov.ns.ca]
Sent: Friday, June 29, 2007 1:35 PM
To: Ochmann St-Jean, Romy: #CB - BC
Subject: Re: Comments: Environ. Guidelines

Hello Romy:

Re: Comments on publication, entitled "Environmental Claims - A Guide for Industry and Advertisers"

Thank you for the opportunity to provide comment on the new publication that provides guidance to industry and advertisers in complying with the provisions of federal product labelling legislation when making environmental claims or using environmental symbols.

First, the draft publication provides a lot of very useful information and I expect industry will find it very practical especially at a time of heightened environmental interest and scrutiny of environmental claims. Is there a similar environmental claims guide targeted at the consumer or is there any intention of producing a guide? A focussed and less technical guide would allow them to make more informed purchases.

The following are a few comments regarding the draft document:

1. Additional clarification and explanation of section 5.19 is recommended. A couple of examples may be helpful.
2. The reference to an annex in Note 1 on page 44 should be annex C, not A.
3. On page 26, consider labelling the diagrams contained in figure 1. It is not clear in the figure or in the text, which diagrams represent recycled content or recyclability of the product.
4. Users of the guide may be interested in knowing about third party environmental certification programs, such as the Environmental Choice Program. Although the publication does not focus on these types of programs, it is a natural extension for companies to consider the benefits of third party certification programs. Adding a section on certification programs should be considered.
5. Additional explanation regarding the permissibility of using "common" environmental symbols (e.g., Mobius Loop) should be considered.
6. Would it be beneficial for companies/consumers to state on labels that the ISO 14021 standard was followed in the production of the environmental claim?
7. The publication does not include an explanation of environmental / organic claims on foods. If the publication is not intended to cover this complex aspect, it should be stated that the labelling of food is not included (with a reference to another manual or organization).

If clarification is needed, please contact me at 902.424.2173.

Happy Canada Day
Solveig Madsen

Ms. Solveig Madsen