



March 30, 2007

Mrs. Carole Gaetz
Competition Bureau
2000, 300 West Georgia Street
VANCOUVER BC V6B 6E1

Dear Mrs. Gaetz:

Industry and Resources appreciates the opportunity to review and respond to this discussion paper. The Government of Saskatchewan is striving for a streamlined regulatory and service framework that facilitates economic growth in the competitive environment of the 21st century, while safeguarding public health and safety, workers, and the environment. Policy approaches that place Canadian industry and consumers at a disadvantage without a clear benefit should be avoided. Additionally we believe that adopting standards that conform to international standards is the best overall approach. Bearing these points in mind the following are our responses to the specific questions asked in the discussion paper.

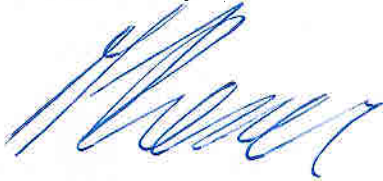
Question:

- 1a) Yes: The provisions are covered elsewhere
- 2a) Yes: The regulations timeline is now obsolete
- 3a) No: Floor covering labeling performs no function for the consumer after the point of sale. The information a label could provide is of no value after the flooring is installed as it is not visible. This type of information is best provided in the bill of sale where it could be retrieved later for cleaning and recycling information.
- 3b) Yes: The French terminology should mirror the English version.
- 4a) No: The partial exemption for unlabelled imported consumer textile articles should not be revoked. This has not been a concern to consumers in Saskatchewan. If it is revoked significant costs will be added to the system.
- 5a) Yes: Secondhand articles should be exempted from labeling. These items may have already been washed many times and any shrinkage or damage is likely already done. Most reused articles that are sold are done so by charity organizations who can little afford the cost of labeling used clothing

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- 6a) No: A provision to require internet textile sales to be labeled is almost unenforceable. Such regulations are bad regulations. The only enforcement possible would have to be done (when declared values are high enough) by customs agents working within the post office system which is already badly backlogged. If "inadequate" labeling is found it can only result in shipments being returned and Canadian customers losing their purchases. Invariably such consumers have difficulty getting reimbursed. All internet sales are considered a "buyer beware" situation in any regard such labeling requirement will protect no one.
- 7a) No: Exemptions from bilingual labeling should not be removed. Bilingual labeling protects few consumers in most western markets. These requirements add costs to manufacturers who export largely to American and world markets. Efforts should be directed to meeting international standards for textile labeling. These would have further reaching long-term benefits.
- 8a) Yes: This is a regulatory streamlining activity.
- 9a) Yes: This is a regulatory streamlining activity.
- 10a) Yes: International textile labeling standards should be encouraged. These would also help address the bilingual concerns.
- 11a) Yes: This is a regulatory streamlining activity.
- 12a) No: Comment: We do not feel qualified to comment on the down vs. feathers questions. What do your industry spokespeople have to say in this regard? Their solutions are likely the most practical and workable.

Yours sincerely,



Greg Riemer
Manager Regulatory Reform
Industry and Resources.