

Comments on the proposal of the Competition Bureau
to adopt a new publication
Environmental claims - A guide for industry and advertisers
Contemporary Information Analysis Ltd.
8 June 2007

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Introduction

The Competition Bureau is seeking public comments on a new publication, entitled *Environmental claims - A guide for industry and advertisers*. The Bureau claims 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.

Our President was a leader in development and review of several of the very first environmentally improved products that were introduced to the Canadian market in 1989. Since that time Contemporary Information Analysis Ltd has been involved in development and/or technical review of more than 100 environmentally improved consumer products manufactured by numerous companies, mostly Canadian but in some cases not Canadian. We believe we are the largest Canadian consultancy involved in technical review and evaluation of environmentally improved products that has consistently been completely independent of any government program or contract for the management and awarding of ecolabels.

Our work follows the codes of professional conduct of the Association of the Chemical Profession of Ontario and the Ontario Environment Industry Association.

Our President has been a member of the Environment Sector Advisory Group on International Trade, reporting previously to the federal Minister of International Trade, and is very familiar with international trade aspects of ecolabelling programs.

It is our opinion that the document *Environmental claims - A guide for industry and advertisers* is seriously out of date, ill conceived, and will be an unnecessary barrier to introduction of environmentally improved products to the Canadian consumer marketplace. Indeed, we are surprised that an organization with the reputation of the Canadian Standards Association wishes to have its name associated with such a poor quality document. We cannot support adoption of this seriously out of date and ill-conceived document for any purpose, let alone a purpose which has regulatory and advisory objectives.

Our overall comment

This document appears to have been designed to put an end to environmental labelling in Canada. We believe the document has no merit and should be explicitly withdrawn. We are not aware of any problems which necessitate any update to the existing Principles and Guidelines for Environmental Labelling and Advertising (PGELA) document.

Previous Consultation

The document states: In 2001, the Commissioner of Competition, head of the Competition Bureau, requested public comments on a proposal to withdraw PGELA as the document to use as guidance when evaluating environmental claims under the Competition Act and the Consumer Packaging and Labelling Act and replace it with the guidance provided in CAN/CSA ISO 14021-00. Following the consultation period, the Competition Bureau requested to partner with CSA to create an updated Essentials document, free of charge to the public, that would serve both as an aid to interpreting the ISO 14021 standard and to provide guidance on how to comply with the provisions of the Competition Act, the Consumer Packaging and Labelling Act and the Textile Labelling Act that prohibit false and misleading representations.

It is not clear to us what has happened since 2001 and there has been no notification to us, as a commenting organization, on any decisions made by the Competition Bureau regarding the outcomes of the 2001 consultation. This document appears to indicate that the Competition Bureau has adopted CAN/CSA ISO14021-00. If this is the case, no notification has ever been provided to that effect. Given that, in 2001, we and many other organizations opposed adoption of CAN/CSA ISO14021-00, the context of the current document is very unclear. We reiterate our 2001 statement: We see no benefit in adoption of CAN/CSA ISO14021-00 and urge the Competition Bureau to stay with PGELA, updated if necessary.

If, as appears to be the case, CSA has been engaged as a partner by the Competition Bureau to undertake a five year review of the outcomes of the 2001 consultation, we wonder why there was apparently no attempt to consult with those who commented negatively in that consultation and why CSA chose not to address examples in the document which are so obviously completely obsolete.

Further, existing Canadian Type 1 environmental labelling fail to adhere in all cases to ISO 14024: Environmental Labels and Declarations: Environmental Labeling Type I, Guiding Principles and Procedures. Until the government-sponsored environmental labelling program adheres fully to the international standard we see it as most unhelpful that the Competition Bureau is attempting to require that self-declared claims adhere to the equivalent standard.

Role of this document

While the consultation press release says that the guide is not regulation, it reads like a regulation without much room for interpretation. We have found that regulators tend to be quite literal.

We recommend that the Guide be amended to include a specific statements making clear that infringement of one of the statements in the Guide does not automatically constitute an infringement of the law. For example, in another similar guide in Europe, there are statements such as "The guide provides general rules but each company is at liberty to determine the instruments that are most suitable for its purpose. The brochure provides impartial information only." In Europe, companies are given flexibility to choose and reasonableness is a guide rather than the more legalistic approach taken by the proposed Competition Bureau guide.

We believe that adoption of the present document by the Competition Bureau will place Canadian brandowners at a competitive disadvantage compared to European brandowners because Canadians will continue to see labels, advertising, and articles suggesting that European green products are more advanced compared to Canadian green products.

General Comments

There is no need to replace PGELA with this document

It is our opinion that PGELA has served both the marketplace and environmentally improved product manufacturers and brand owners well and we see no justification for making a change at this time.

We submit that neither European countries nor the United States are actively considering adopting ISO 14021 as a *de facto* regulatory standard, as is being proposed by the Competition Bureau. Thus the argument that CAN/CSA-ISO 14021-00 is more consistent with international terminology and hence more accepted internationally is not correct.

We submit that the technical differences between PGELA and CAN/CSA-ISO 14021-00 are minor and the technical section of CAN/CSA-ISO 14021-00 could easily be added to PGELA if need for such a change could be demonstrated. However we are not aware of any situations which have arisen over the past 10 years where a product would be deemed to comply with PGELA but would not comply with CAN/CSA-ISO 14021-00. Hence the technical differences between PGELA and CAN/CSA-ISO 14021-00 are in fact of little or no consequence.

Similarly we have no difficulty with the methodologies recommended by CAN/CSA-ISO 14021-00. Again, we believe that all responsible marketers of environmentally improved consumer products in Canada are already following these recommended methodologies. We see no difficulty in adding a section on methodologies to PGELA but see no pressing requirement or need to do so.

This document will discourage introduction of environmentally improved products

The Government of Canada has consistently encouraged the introduction of environmentally improved products and to the best of our knowledge continues to do so today.

In our opinion two aspects of CAN/CSA-ISO 14021-00 will act as a barrier to marketplace introduction of environmentally improved products:

- 1) CAN/CSA-ISO 14021-00 explicitly prohibits clear labelling of environmentally improved products; and
- 2) CAN/CSA-ISO 14021-00 requires disclosure of proprietary information, including ingredient information, that need not be disclosed, and is normally not disclosed, for non environmentally improved products.

1) Labelling

CAN/CSA-ISO 14021-00 appears to explicitly prohibit the use of terms such as “environmentally friendly” and “green”. Consumers need and want a clear indication of which products are environmentally improved. PGELA allows and encourages the use of terms such as terms such as “environmentally friendly” and “green” provided a clear explanation of the reason for the environmental improvement is provided.

By banning the use of clear labels terminology, CAN/CSA-ISO 14021-00 makes it impossible for a brand owner to draw the consumer’s eye to an environmentally improved product or for a consumer to quickly find an environmentally improved product on a store shelf.

2) Disclosure of proprietary information

CAN/CSA-ISO 14021-00 requires that claims can only be made if they can be substantiated from data which are to be made available to the public. If the data is proprietary, an environmental claim must not be made.

This provision alone will completely kill the marketing of environmentally improved consumer products in Canada.

In Canada, non-food consumer products are generally not required to disclose ingredient information. Most manufacturers and distributors choose not to disclose such information. As most environmentally improved products are environmentally improved because of the presence or absence of certain ingredients, the impact of the provisions of CAN/CSA-ISO 14021-00 is that ingredient information will have to be made available to the public and to competitors for most environmentally improved products.

Most manufacturers will not do this and we predict that most environmentally improved products will be discontinued, or at least not labelled as such. This totally destroys the government’s professed intention to encourage introduction of environmentally improved products.

What does this Guide cover?

Nowhere does this document define its coverage. For example, if a vehicle manufacturer claims a “tougher truck”, is that an environmental claim? If a flashlight manufacturer claims a “more durable flashlight” is that environmental claim? If a battery manufacturer claims a “longer life battery” is that an environmental claim? If a battery manufacturer claims a battery “reduces waste because it lasts longer” then somehow it suddenly becomes subject to specific regulation by this document.

It is our opinion that there is no requirement for the Competition Bureau to provide special coverage for environmental claims that is different from the documentation, regulation, and enforcement of product claims in general.

Section By Section Review

Section 4.4 Vague and non-specific claims

The document states: An environmental claim that is vague or non-specific or which broadly implies that a product is environmentally beneficial or environmentally benign shall not be used. ISO 14021, Clause 5.3.

The purpose of being clear and specific is to protect consumers from deception. Environmental benefits need to be specific so there will be no misunderstanding. For example:

Preferred

This product has replaced CFCs with an alternative that does less harm to the ozone layer.

Discouraged

This product is ozone-friendly."

Our comment: The statement given as an example of preferred is illustrative of how much the authors of this document are out of touch with reality. For the Competition Bureau to provide an example that is in fact an illegal claim as a preferred claim would be a travesty and would bring the Competition Bureau into serious disrepute.

The fact is that "This product has replaced CFCs with an alternative that does less harm to the ozone layer." is an improper green claim. The use of CFCs in any product in Canada is now banned and for any brandowner to make marketing claims based on regulated product formulation requirements is improper. We strongly urge that this example be removed.

We have a further comment on this section. Vague claims have always been accepted if accompanied by supporting explanation. This can be expressed in several ways. "This is a green product because it uses less energy than a conventional product" is usually seen as acceptable because it is not vague and is comprised of a single sentence. However "This is a green product. It uses less energy than a conventional product." is two separate statements and appears to contravene Section 4.4 because it includes a vague statement as well as a descriptive statement. Section 4.4 is absurd in this regard.

We recommend that the recommendation should be amended to read: An environmental claim that is vague or non-specific or which broadly implies that a product is environmentally beneficial or environmentally benign shall not be used unless it is accompanied by a statement which provides support for the claim.

In Germany, according to more recent legislation, there is no case for misrepresentation if the facts of the matter are general knowledge and are therefore taken for granted.

In addition, a Hamburg Court set a new model for labelling for consumer products by ruling that terms such as green electricity and eco-electricity were not misleading because the "average moderately well-informed, attentive, sensible citizen wouldn't take these terms literally."

Section 4.5 Claims of "...free"

The document states: "An environmental claim of "... free" shall only be made when the level of the specified substance is no more than that which would be found as an acknowledged trace contaminant or background level. ISO 14021, Clause 5.4

Claims of "... free" must not be made based on the absence of ingredients that were never in a product or which were only ever present at a background level. It is permissible to make a claim of "...free" where trace amounts of an element exist because the element is ubiquitous in the environment but NOT when any trace amount of the element has been added to the formulation.

Note: Exporters should check local legislation that may not allow claims of "free".

Discouraged

A claim of "CFC free" on a pump spray bottle would not be considered appropriate as CFCs are not used as propellants in pump spray bottles.

Discouraged

"Chemical free" claim on organic products where chemicals were never used in the first place.

Preferred

"Lead free" claims for solder in electronics.

Our comment: We disagree that organic ought not to be using the term e.g. synthetic chemical free (or some version of that) because pesticides, for example, were never used in the first place: the comparator is food in general and consumers want this information in order to make better environmental choices. Now that Canada has a standard defining organic requirements for food products, organic labelling of food must adhere to that standard. The Organic Standard of Canada has a different requirement than the "organic" usage required specified in this document.

We recommend that the test should not be whether the -free applies to the specific product but whether the category of products contains these more environmentally harmful elements or is produced in a relatively more environmentally harmful way; by choosing environmentally improved features in products the consumer is helping achieves environmental goals.

For example the lead-free example for solder is really no different than the organic one, some manufacturers have not used lead in solder for some time and should be allowed to make that claim because other solder still has lead. The organic and lead cases are quite different than CFC-free in pumps because no pumps on the market had CFCs. CFCs are again an absurd and misleading example because this chemical is now prohibited and therefore claims relating to CFCs are not appropriate.

Wording should relate to what is on the market - if there are a reasonable number of products with poorer environmental features, the manufacturer of an environmentally friendlier one should be allowed to make the claim. This would achieve the aim of driving the market towards production, processes and products with less environmental impacts.

Section 5.6 Self-Declared Environmental Claims

Document: "It is not sufficient to make vague claims of environmental improvement such as "green" and "environmentally friendly"; any claim must detail the environmental benefit in such a way that it can be verified, if such verification is required by the purchaser....product we have reduced waste at the production phase, compared with our last model. All resource use claims require a comparative statement to qualify the statement, as in the above example.

Industry, government and consumers need a way of describing categories of products, etc. On February 14, 2007, a press release from Transport Canada and Environment Canada was headed, "Canada's New Government helps Canadians choose more eco-friendly vehicles." There was no explanation in the press release as to what the two departments of the Government of Canada meant by "eco-friendly" vehicles. They were therefore out of compliance with this draft Guide. Environmentally friendly is a term which is needed and in common use as the first paragraph of that press release indicates: "TORONTO - The Honourable Lawrence Cannon, Minister of Transport, Infrastructure and Communities, and the Honourable John Baird, Minister of the Environment, announced today at the Toronto Auto Show that two new programs will help Canadians choose more ecofriendly vehicles. As part of its ecoTRANSPORT Strategy, Canada's New Government will commit up to \$36 million in funding for new programs aimed at raising awareness, increasing availability of more environmentally friendly cars and trucks, and encouraging Canadians to make informed choices when purchasing a vehicle. .. The program will showcase these new environmentally friendly technologies at auto shows"

It is absolutely inappropriate for the Competition Bureau to try to prevent brandowners and advertisers from using terminology that is regularly used by government ministers.

Section 5.7 Self-declared environmental claims

The document states "Self-declared environmental claims, including any explanatory statement: shall not be restated using different terminology to imply multiple benefits for a single environmental change;

ISO 14021, Clause 5.7 f)

It is inappropriate for a claim to overstate the environmental benefits of one environmental change. The claim and the explanatory statement need to be precise about any additional benefits and how they relate to the single environmental change. Further, the terminology used should be consistent.

Preferred:

By using 65% recycled content, we are reducing waste at the production phase compared with our last model.

Discouraged:

By using 65% recycled content, we are reducing waste at the production phase. Trees are being saved by the use of recycled wood fibres and therefore the air we breathe is cleaner.

Our comment: The intent of environmental labelling is to encourage consumers to make the choice which reduces environmental impacts. Environmental improvements often have a domino effect so the truth is that when consumers buy recycled content products they not only contribute to savings

in resource use but also other impacts such as energy. In addition, images and eco-statistics help consumers understand how important their choices are. It is very common to see this type of illustration being made e.g. comparison of greenhouse gas emissions to number of cars taken off the road. It is also common for claims to be prefaced by wording such as “Help to Save the Planet” which most reasonable Canadians would understand to mean ‘taking a step towards’ rather than interpreting it as a literal statement.

We recommend deleting this section.

The requirement to compare to "our last model" does not seem to add clarity because companies have many models so we are not sure what clarity this adds. We agree that the percent reduction should be compared to something definite but why restrict the claim to the company's own rather than to competing products currently available in the Canadian market.

Section 5.13 Self-declared environmental claims

The document states: "Self-declared environmental claims, including any explanatory statement: shall only relate to an environmental aspect that either exists or is likely to be realized, during the life of the product;

ISO 14021, Clause 5.7 I)

This requirement is particularly relevant when making claims about design for disassembly or compostability of products that require community-composting systems for adequate degradation (see Clauses 10.2 and 10.4 of this Guide).

Example:

Brown bags for garden waste are technically compostable in community systems but if no city in the vicinity where these bags are sold, has, or is planning collection of garden waste and community composting, the claim should not be made as it is unlikely that such collection and composting sites would be established before the current stock of bags is sold.

Example:

Many electronic products that are imported from Asia are designed to be disassembled. However, the systems are not in place in Canada to either take back the products or deal with the waste from consumers disassembling the product. The claim of "designed to be disassembled" should not be made unless it is known that those facilities are likely to be established before the end of the product's useful life.

Comment: Because of the wide variability of programs across the country, too tight an interpretation of this clause could virtually eliminate all environmental claims relating to recyclability to the detriment of consumer choice. The materials recycled by communities is constantly changing due to market conditions. Communities tend to issue guides of their own which specify which materials are collected. The cost to industry of constantly changing labels would be prohibitive. While it is reasonable for the Competition Bureau to restrict the use of the term to ensure that a certain level of recycling is going on, the given level of restriction is unreasonable.

Section 8.2 Selection of evaluation and claim verification methods

The document states: Some of the claims that are defined in ISO 14021 cannot be supported by scientific testing and will require detailed inventory data to verify their accuracy.

Our comment: This is vague and impossible to understand. The statement fails to meet all the requirements for clarity that the document requires of industry. If it is not clear, why include it?

Section 8.3 Access to information

The document states: A self-declared environmental claim shall only be considered verifiable if such verification can be made without access to confidential business information. Claims shall not be used if they can only be verified by confidential business information.

ISO 14021, Clause 6.5.1

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

ISO 14021 details the minimum information that is required to document a claim:

- a) identification of the standard or method used;
- b) documentary evidence, if verification of the claim cannot be made by testing the finished product;
- c) test results, where these are necessary for claim verification;
- d) if testing is carried out by an independent party, the name and address of the independent party;
- e) evidence that the claim conforms to the requirements of 5.7 h) and 5.7 r);
- f) if the self-declared environmental claim involves a comparison with other products, then a description of the methods used, the results of any tests of those products, and any assumptions made shall be clearly stated;
- g) evidence that the claimant's evaluation gives assurance of the continuing accuracy of the self-declared environmental claim during the period over which the product is on the market, and for a reasonable period thereafter, taking into account the life of the product.

ISO 14021, Clause 6.5.3

Our comment: The requirement to release confidential business information could be a game-ending requirement for the potential development of markets for green products unless the same requirement applies to all products whether with environmental claims or not. Competitors seeking to make similar products can merely ask for the formulations, many of which have been developed at considerable cost and effort. Time, effort and costs can increase significantly for environmentally labelled product providers if the provider is targeted by requesters of information just to protest an issue. While verification is necessary, some mechanisms for providing that verification are needed to maintain confidentiality of key business data.

Also it should be clarified that not all products require "testing" but that evaluation may involve a number of methods as long as the methods are appropriate for the the material/product and that the evaluation is sound.

Section 10.1.1 Compostability

The document states: "Example:

Compostability: Special leaf bags designed to degrade with the leaves they contain could be identified as "Compostable in municipal facilities in the Greater Vancouver area"

Our comment: This is much too specific and makes it impossible to market across Canada ---document discourages use of the term where facilities exist

We recommend that the term "where facilities exist" continue to be allowed provided the brandowner or some other organization post a website describing where a reasonable number of facilities exist for that product or for products of that general type. Consumers would be directed to the website for information on where facilities exist.

Section 10.5 Extended Life

Document: "Example:

"This is an extended life computer and will last twice as long as our last model"

Our comment: What is a model? The next model can be quite different or may be a different product entirely and yet still have made environmental improvements.

How do improvements get recognized in cases where the shift in product design is significant.

Section 10.7.2 Qualifications

The document states: Preferred

This container is recyclable through the Blue Box program in Southern Ontario and at recycling depots in Winnipeg and Edmonton.

or

This polyethylene (PETE) bottle can be recycled in blue box programmes in Montreal and Toronto

Discouraged

Recyclable where facilities exist.

Our comment: Some of the products sold to the market have a long life and the specific claims may turn out to be false, more confusing to the public than if they are asked to check their household recycling guide provided by their municipality. It certainly would be appropriate for the producer to verify that there are major centres in Canada where the product is recyclable.

The document states: Some businesses or sectors with established private recycling programs can make "recyclable" claims for the products they recycle, provided the program is conveniently available to a reasonable proportion of purchasers where the products are sold. Otherwise, the "recyclable" claim must be qualified to indicate the availability of the recycling program in the specific locations

where recycling programs are offered.

Example:

Used motor oil may be recyclable through retailers and dealers in participating locations. The manufacturer recycles it for resale. It is labelled "recyclable" when originally purchased and "recycled" when re-refined and re-sold. This claim is acceptable, even though the oil is not recyclable through conventional municipal recycling programs but is recyclable at participating stores in locations identified.

Example:

If a manufacturer of toner cartridges for laser printers establishes a recycling program to recover its cartridges exclusively through its nationwide dealership network and the company advertises its cartridges nationally as "Recyclable — Contact your local dealer for details", the "recyclable" claim should be qualified to indicate the limited availability of recycling locations.

An example is: "Dealers in major metropolitan areas accept toner cartridges".

Our comment: The qualification saying "Dealers in major metropolitan areas" seems very similar to the disallowed "where facilities exist." Agree that "where facilities exist" should be substantiated by the producer to ensure a certain level of recycling is occurring but this shouldn't have to appear on the label.

We recommend that brandowners be required to provide information on the location of recycling facilities or depots through a website generally available to consumers. This would most effectively be a national website which provides the location of a reasonable number of recycling depots and the materials collected by major municipal programs.

The document states: Example:

When a recyclable claim is made, you may use the Mobius loop symbol with or without words. However, a Mobius loop without any qualifying statement would be inappropriate if infrastructure to collect, process and re-manufacture the material is not conveniently available to a reasonable proportion of purchasers (see Clause 10.1.2 of this Guide).

Our comment: The Mobius loop without any explanation to mean both recyclability and recycled content is very confusing to consumers.

Section 10.8.1 Usage of terms

The document states: Consideration shall be given to the fact that a higher percentage of recycled content does not necessarily imply a lower environmental impact. Because of this, the recycled content claim, in particular, should be used with discretion.

NOTE Attention is drawn to the requirements of 5.7 h). ISO 14021, Clauses 7.8.1.1 b) and c) and 7.8.1.2

Our comment: Any of the environmental claims may have similar effects as recycled content: why is this environmental claim more open to criticism than the others?

Section 10.12.1.2 Refillable

The document states: A characteristic of a product or packaging that can be filled with the same or similar product more than once, in its original form and without additional processing except for specified requirements such as cleaning or washing.

ISO 14021, Clause 7.12.1.2

The design of products that claim to be refillable and/or reusable must be such that they can be reused for their original purpose.

Example:

An unqualified claim of "refillable" could be made if the manufacturer sells a concentrated refill for the detergent bottle in all locations where the original bottle is sold.

Example:

Lidded hard plastic containers marked "refillable" for baby wipes can be replenished with baby wipes sold in foil packages provided both the rigid boxes and the foil refills are available in all locations where the product is sold.

A claim of "refillable in your local grocery store" would be considered misleading. The claim should read, "Refillable in all Penners Grocery Stores in Manitoba, Saskatchewan and Alberta".

Our comment: The requirement to have refills at "all locations" makes it almost impossible to comply. At times, certain stores may fail to stock an item or it may be sold out. Some more reasonable benchmark would be appropriate.

Conclusion

It is our experience that several industry associations operating in Canada and outside of Canada are in fact generally opposed to environmental labelling of consumer products. We understand that these associations were among those consulted during development of ISO 14021. We were not consulted, despite our extensive experience in this field, and to the best of our knowledge none of our clients who use environmental labels in the marketplace were consulted.

It is our opinion that ISO 14021 was developed to serve as an intentional barrier to continued introduction of clearly labelled environmentally improved products.

It is our opinion that the Government of Canada should be encouraging, not discouraging, retail marketing of environmentally improved products.

It is also our submission that environmental labelling is receiving an excessive amount of attention, given the very small number of complaints which we believe to be filed with the Competition Bureau. As active observers of the Canadian retail marketplace, we believe that many consumer products in many categories, other than environmentally improved product categories, are labelled in a potentially misleading way or make claims, other than environmental claims, that are inaccurate. Many non-environmental product performance claims that we see in the Canadian marketplace are

absolutely ridiculous. The Competition Bureau is not producing guides or adopting international standards to regulate most of these other categories of claim.

For these reasons we recommend that there be no change to PGELA.

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