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From: Nicole LeBoeuf [jpmartel@fpac.ca] on behalf of Jean Pierre Martel [jpmartel@fpac.ca]
Sent: Friday, June 15, 2007 11:16 AM
To: Audet, Diane: #CB - BC
Subject: Environmental Claims vs Forest Products Association of Canada (FPAC)

Dear Ms. Audet:

Thank you for your March 5, 2007 letter to Avrim Lazar inviting the Forest Products Association of Canada (FPAC) to comment on the document entitled, "Environmental Claims - A Guide for Industry and Advertisers".

FPAC would now like to offer the following comments on this document.

FPAC Comments on "Environmental Claims - A Guide for Industry and Advertisers"

Clause 4.6 Claims of sustainability

Comment: The *preferred sentence* used states, "This wood comes from a forest that has a registered sustainable forest management system." This language dates back to when the CSA Sustainable Forest Management Standard (CAN/CSA-Z809) was in its original form, i.e. 1996. Since then the CSA Standard has been revised and republished in 2002 and is undergoing a revision again. Today, groups such as CSA and FPAC no longer use the term registered in sustainable forest management, nor do we talk about a system...we are looking at both system and performance requirements in all of the SFM standards in use in N. America, be it the Canadian Standards Association (CSA), Sustainable Forestry Initiative (SFI), Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification Schemes (PEFC) standards. Hence the preferred sentence should read: "This wood comes from a forest that was certified to a sustainable forest management standard (i.e. CSA, SFI, FSC, PEFC)."

OR FOR AN UNDERTSANDING OF THE ACRONYMS...

"This wood comes from a forest certified to:

- o the CSA Sustainable Forest Management Standard (CSA)."; or
- o the Sustainable Forestry Initiative Standard (SFI)."; or
- o a standard recognized by the Forest Stewardship Council (FSC)."; or
- o a standard recognized by the Programme for the Endorsement of Forest Certification schemes (PEFC)."

The *discouraged sentence* used states, "This wood is produced from a sustainable forest". Instead the discouraged sentence should read. *This wood is sustainable.* A claim about a product's sustainability requires life-cycle analysis, and cannot be based on a single attribute of the product such as how it was managed and extracted. Hence, claims need to be linked to the achievement. The wood does come from a forest that was certified against a sustainable forest management standard, but that does not mean the entire wood product is sustainable.

Clause 5.17 – "shall not be made where they are based on the absence of ingredients or features which have never been associated with the product category".

Comment: What the proposed document appears to be saying is, if a certain type of margarine never contained transfats in the first place, you can't start selling it as "transfat" free. Likewise, hair spray pumps never required CFCs and therefore you can't put "CFC-free" on hair spray pump bottles. Likewise, by such logic, you can't talk about a forest being carbon sequestering, because it always was carbon sequestering. What this document, and ISO are saying is, it is only if you actually improved a product over its natural and inherent product properties that you can make a claim about it. FPAC believes that if there are two like products, buyers might not be informed enough to know that products such as hair spray pump bottles don't contain CFCs as opposed to aerosols which do, so FPAC would like to see on the spray pump bottle that it is "CFC-free" so the buyer can make an informed purchasing decision. When like products are involved, the marketing should speak to natural and improved properties, and not be limited to pure improvements.

Clause 6.4 use of natural objects in symbols

Comment: The example used again talks about a forest with a certified sustainable management system. The first sentence under the example should be changed to read: "A tree symbol is acceptable for a wood product made from wood derived from a forest that was certified to a sustainable forest management standard (i.e. CSA, SFI, FSC, PEFC)."

Clause 7 The Mobius loop

Comment: Based on our experience, the first two examples (from left to right) given in Figure 1 are intended to denote "recyclable" while the third (far right) is intended to denote "recycled content". Could you please clarify this in relation to proposed text you are consulting on in this case.

Clause 10.8.4. Evaluation methodology

Comment: The example cited states, "The claim is appropriate because the 50% figure is based on the lowest amount of recycled material in any month of the rolling annual average." FPAC believes this is inappropriate. The concept of only speaking about the lowest % content (recycled, certified, or otherwise) in any month is counter-intuitive. The whole point of using averages is to allow one to communicate that average. An average just ensures that over a certain period of stipulated time you don't make a claim for more % content coming out in the form of product, than went in, in the form of inputs. That is all that has to be protected, i.e. so if over 12 months we have 35% recycled content going in on average, then we only claim 35% recycled content on the output side. That said, people should be able to use a shorter average period if they like, i.e. 1 month, 2 month, 3 month etc, but then they just have to align content claims with the timeline being used.

If you have any questions concerning any of these comments, please do not hesitate to contact me.

FPAC looks forward to your response to these comments.

Sincerely,

Jean-Pierre Martel
Senior Vice President, Sustainability
Forest Products Association of Canada
99 Bank, Suite 410
Ottawa, ON K1P 5B9
Email: jpmartel@fpac.ca

Tel. 613 563- 3735
Fax. 613 563-4720