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**Interdepartmental Task Force
on Transborder Data Flows
: background papers**

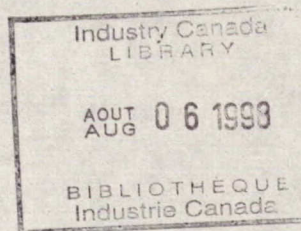
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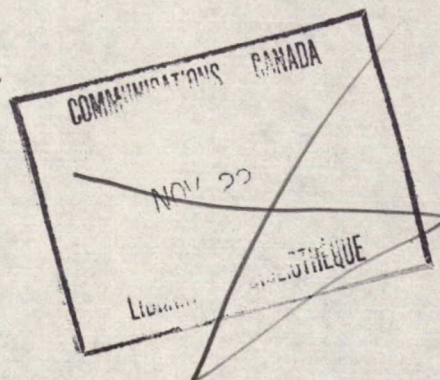
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1. [Background papers]

INTERDEPARTMENTAL TASK FORCE
ON TRANSBORDER DATA FLOWS



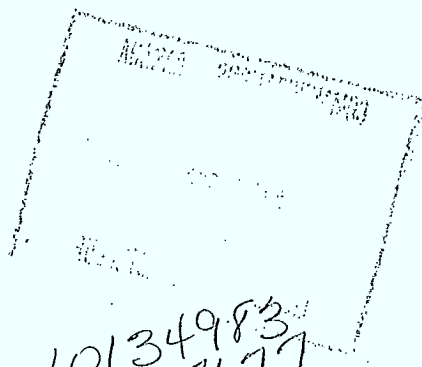
Discussion paper based on the work of the
International Aspects Working Group



September, 1983

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1. Introduction

Transborder data flow (TBDF) is international by its very nature since it involves the transmission of data and information across national boundaries. It covers a wide spectrum of different types of data and information flows, but the prime focus in international debate has been, initially, on personal data, and more recently on economic and legal implications of machine-processable business data. There is, as yet, no definition that is accepted internationally although, to date, telephone discussions are generally acknowledged as outside the area of debate, and cultural issues have often been avoided in the TBDF context although this may be changing. There has been a tendency internationally for ideology or predilection (e.g. regulators will seek to regulate, free-traders will advocate laissez-faire) to precede analysis.

The Task Force found no shortage of opinion internationally, but also fairly frank admissions in a number of national governments that the analytical base was not highly developed. There also appeared to be a fairly sharp distinction between theory and practice in some countries which tend to officially follow a regulated approach in many areas but where private economic interests have so far been left more or less free to carry on relatively unhindered, or where official statements favour free flow and practice lead to some restrictions.

The implications of these flows are now beginning to be seriously studied by governments and international organizations. Many governments have already passed legislation in the privacy area. Attention is now being increasingly focused on the economic and sovereignty dimensions of TBDF.

The international nature of TBDF has led governments to examine the question collectively. In the case of privacy, this has led to cooperative or coordinated approaches, although policy differences do not permit this in all instances. Study of the economic aspects is at a much earlier stage though work has begun, for example at OECD. Finally, TBDF also contains the potential for some North/South misunderstanding.

The purpose of this report, prepared by the International Aspects Working Group of the Task Force, is to review the policies and activities undertaken by national governments and international organizations in order to provide an understanding of the international context in which Canadian policy making will take place. Any Canadian policies developed will need to be analyzed to assess the

implications they will have on Canada's foreign relationships, including the perception in some countries that Canada is in the vanguard of countries studying TBDF and the possible example that Canadian measures might set. Similarly, the policies of other countries can affect certain Canadian interests and appropriate responses may be required. Feedback received from Canadian business representatives indicates that they have no major problems with TBDF that now negatively affect their operations.

The following sections of the report will focus on activity in international organizations, in the USA, in other OECD countries and in developing countries. The efforts of international organizations are particularly important in this area since they provide a major source of much of the information and analysis on TBDF issues, provide a forum for the exchange of views and for policy harmonization and an indication of the thinking in other countries. The USA is treated separately, given its importance to Canada in this area. The policies and attitudes of a number of the Western industrialized OECD countries are examined, since these countries are also major trading partners. The developing countries are also covered, to the extent policies are adopted or known, given the increasing role these countries are taking in international fora and their growing significance on the world economic scene.

2. TBDF as an issue at the international level

This section will briefly examine the activities of international organizations involved in TBDF issues.

2 (a) The Organization for Economic Cooperation and Development (OECD)

The OECD, which is composed of twenty-four Western industrialized states, was the first international organization to become interested in TBDF and continues to be the most involved in these issues. Discussion in the OECD first began from the privacy perspective, turning more recently to broader economic and legal aspects. The focus on privacy culminated in September 30, 1980, when the OECD Council approved the "Guidelines Governing the Protection of Privacy and the Transborder Flow of Personal Data". At that time Australia, Canada, Iceland, Ireland, Turkey and the United Kingdom abstained. Iceland, Turkey and the United Kingdom have subsequently approved the Guidelines.

Canada's abstention from the Guidelines is continuing, based on the fact that too little is known about

the broader international implications of TBDF for Canada and therefore it is premature to be committed to principles (even though they are not legally binding) before a greater awareness and understanding of the broader international implications are achieved. This position will be reviewed as policy development proceeds.

Work on the broader economic implications of TBDF has been going on in an OECD Working Party of the Committee on Information, Computer and Communications Policy, chaired by a Canadian official. Work has concentrated on intra-corporate "non-market" data flows, collecting information primarily of a qualitative nature on the impacts of TBDF on the operations of transnational corporations. In addition, assessment is also being made of on market flows associated with the "arms-length" purchase of software and computer based information services. Working in close collaboration with this group is the Business and Industry Advisory Committee (BIAC), an officially accredited representative of private enterprise to the OECD through BIAC's group on Information, Computer and Communications Policy. Recent focus of its work were issues concerning legal persons in West European data-protection legislation and a major survey of TBDF use by MNE's for the Second OECD Symposium on TBDF.

In addition to the focus on the economic implications of non-personal TBDF, the OECD has turned its attention to legal and trade in services aspects. Some exploratory work has been done on specific legal questions (computer crime and liability issues) but this is a complex field which will require further study. Trade in data processing and information services and other communications-based services is part of a general study of trade in services by the OECD. Preparations are underway for a major OECD symposium on TBDF to be held in London, December, 1983. The symposium will discuss the results of recent OECD economic studies as well as the preliminary results of the work on legal aspects, and explore options with regard to future work and areas of possible international cooperation.

Given the importance of the OECD as a forum for international discussion of TBDF issues, it is worth examining the attitudes taken here. Differences exist among the countries in their approaches. This was apparent at the High Level Conference on Information, Computer and Communications Policies for the 80s held in October 1980. The points of view ranged from a stress on the importance of the "free flow" of information and on the need for free trade in information goods and services, to concerns that increasing

flows could lead to concentration of data processing activities in a small number of member countries. There was general agreement that TBDF issues "transcend trade policies".

Discussion in the OECD is beginning to clarify some of the issues. One of these, which was raised at the High Level Conference, is whether "data flows can be compared to, or treated as if they were normal goods and services moving in international trade." The growing international emphasis on trade in services relates to this question. There has been some movement in the approach to the issue of "free flow". Originally, primarily a philosophical concept, there is now a growing recognition in a number of countries that this is not an absolute concept, that it is open to a wide range of interpretations, and that certain measures which countries had not regarded as restrictive could be interpreted as such by others. In addition, there is also a growing acceptance in many quarters that complete "free flow" may not always be possible. A recent example of this attitude is contained in a US based CBEMA "White Paper" on International Information Flows" which states that: "There are fundamentally valid reasons why some degree of control must exist in processing and handling information", and the statement that one of these concerns relates to "proprietary rights of individuals and business enterprises." Considerable work will be required to clearly define these issues.

Most OECD member countries policies on TBDF have so far been limited to the privacy area. No government has yet announced policies specifically relating to the broader issues raised by TBDF. However, some of these are under study. Actions or proposed actions in some countries - particularly concerning the use of communications facilities - would have an impact on TBDF. As this recognition grows, interest in and awareness of TBDF issues is increasing.

From the Canadian point of view, it will be important to keep active in the work on TBDF in the OECD. It is in this forum that many of the issues of concern to Canada will be considered. In addition, Canada will need to ensure that policies of other governments do not seriously harm the ability of Canadian industry to compete, and that our own domestic policies keep reasonably in step with any consensus achieved in the OECD.

2(b) The European Community

The Community is in the process of formulating a common position on a wide range of issues pertaining to TBDF

and participates in OECD and Council of Europe activities concerning economic as well as trade-related aspects of TBDF. One area of specific TBDF-related initiatives is the European Strategic Programme for Research in Information Technology (ESPRIT) which the Community is undertaking along with the Interinstitutional Integrated Services Information System (INSIS) and EURONET-DIANE (a transmission network permitting access to Western European data-base services).

2(c). The Council of Europe

Work in 21 member Council of Europe initially evolved in parallel with work in the OECD and concentrated on privacy concerns. The Council's "Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data" was adopted by the Committee of Ministers on September 19, 1980 and approved by the Council early in 1983. Canada attended some of the drafting sessions as an observer, but no consideration has yet been given to adherence to the Convention.

There are many similarities between the OECD Guidelines and the Council of Europe's Convention, particularly in regard to the core principles for the protection of personal privacy. The main differences are:

- the Convention gives little attention to "free flow", while the OECD Guidelines give it particular emphasis.
- the Convention, when ratified, is legally binding whereas the Guidelines are voluntary;
- the Convention focuses on automatic data processing only, while the Guidelines deal with personal data, however stored or processed;

Following adoption of the Convention, the Council of Europe initiated work on extending the application of the basic Convention principles to specific sectors of activity. This resulted in a recommendation on Automated Data Banks being adopted by the Committee of Ministers of the Council on January 23, 1981 and a draft recommendation on the protection of personal data used for purposes of scientific research and statutes. Further work is underway on the protection of personal data used for direct marketing purposes and problems arising from the use of personal data as regards social security, travel and identity documents.

2 (d) The Intergovernmental Bureau for Informatics (IBI)

The IBI has been covering a broad range of informatics issues arising from rapid developments in

computer and communications technologies. IBI has a membership of about thirty-six countries, most of which are developing countries (only France, Spain, and Italy provide representation from the industrialized nations). Canada is not a member, but has attended a number of IBI conferences as an observer. In 1978, in cooperation with UNESCO, IBI organized a Conference on Strategies and Policies for Informatics (SPIN), covering a broad range of public policy issues, including TBDF.

As a follow-up, the IBI organized, in June 1980, a World Conference on Transborder Data Flow Policies. Its objective was to "facilitate the discussion and understanding of the various and interrelated aspects of transborder data flows", rather than to reach definitive conclusions. Emanating from that conference was a decision to establish three working groups on TBDF: on the economic implications; on the legal implications; and on the international environment. To follow up discussions in the Working Groups, the IBI has undertaken a 134 country survey of TBDF policies and practices of governments, telecommunications administrations and MNE'S.

The IBI is in the process of preparing for a SPIN II Conference to be held in Cuba in 1984 which will examine some fundamental aspects of TBDF which are of interest to developing countries, in addition to encouraging the setting up of mechanisms for, or the formulation and adoption of universal principles on TBDF. Preparations for SPIN II were launched by a 1981 meeting in Mexico presided over by President Lopez Portillo. The "Declaration of Mexico on Informatics, Development and Peace" was issued after that meeting. Article 4 of that Declaration states that: "international debates are needed on transborder data flows and their impact on the international division of labour and technological concentration." Preparations to date indicate that participating governments will discuss measures and develop guidelines to protect data, based on the principle of free flow of data within the framework of internationally recognized information sovereignty, economic and privacy protection rights.

There is concern in a number of Western countries, including Canada, that the activities of the IBI could lead governments of developing countries to introduce restrictions on the flow of data and information before their need has been demonstrated by careful analysis and evaluation.

2 (e) The United Nations Centre on Transnational Corporations (UNCTC)

The UNCTC, as part of its mandate, is required to assess measures related to the negotiating capacity of governments in their relations with transnational corporations (MNEs).

A 1981 UNCTC report put emphasis on the need to address the concerns of the developing countries, since the OECD is already dealing with concerns of the industrialized countries. In addition it suggested that, as MNEs are of key importance in TBDF, work would naturally focus on their role and contribution. Concerns identified in the report include the impacts on the international division of labour, the competitiveness of domestic corporations in host countries, the bargaining position of host countries, and national sovereignty. It is suggested that while TBDF may lead to an increase in existing imbalances, it could, under certain circumstances, further the development objectives of developing countries and contribute to redressing present imbalances.

Three projects were undertaken by the Centre on a priority basis. One project comprises country case studies aimed at assessing the role of MNEs in TBDF and the socio-economic impacts of TBDF, particularly on developing countries. A case study was prepared by Brazil, and others are expected from Canada, the FRG, Mexico, South Korea and the United States, Poland and Costa Rica. A second project is on access to the international data market to assess the availability of relevant data and data services to developing countries and examine the problems they face in obtaining and using these data. The third project has been technical studies on remote sensing data, which resulted from concern expressed by some developing countries about possible infringement of national sovereignty caused by special applications of TBDF such as remote sensing.

2 (f) The International Telecommunication Union (ITU)

While the ITU has not, until recently, devoted specific attention to issues raised by TBDF, its work provides a backdrop to consideration of the issues. For example, its work covers planning of the infrastructure and the systems which are enabling the current expansion of information and data flows in all their forms (such as its format for data networks and the regulations for international leased lines for data transmission). In addition,

its work on the regulation of international telecommunications takes into account the interests of the state, the interests of individual users and the interests of the telecommunications carriers.

Provisions relating to the regulation of international telecommunications are laid down in the International Telecommunications Convention and permit state intervention in international telecommunications for reasons not directly relevant to telecommunications themselves. For example, Article 19 allows Members to stop virtually any type of communication "which may appear dangerous to the security of the State, or contrary to their laws, to public order or to decency," and Article 20 established the right of a Member to suspend international telecommunications services, providing only that it informs other members of its action. As regards TBDF, the ITU Plenipotentiary Conference in Nairobi in 1982 adopted a resolution to establish ... "a broad international regulatory framework for all existing and foreseen new telecommunication services". Proposals for a new framework will be considered at a World Administrative Telegraph and Telephone Conference in 1988.

2 (g) United Nations Commission on International Trade Law (UNCITRAL)

Certain international legal problems resulting from electronics and computer technology developments could raise obstacles to international trade. UNCITRAL has begun work on a guide to identifying problems arising in connection with electronic funds transfers and discussing possible solutions. In related work UNCTAD is carrying on studies on protectionism and structural adjustment in particular on the question of trade in data services.

2 (h) The World Intellectual Property Organization (WIPO)

WIPO is the United Nations specialized agency for intergovernmental cooperation in "industrial property" (patents and other rights in technological inventions, rights in trademarks and industrial designs, etc.) and in "copyright and neighboring rights" (chiefly in literary, musical and artistic works, in films, records, etc.).

A WIPO expert committee has drawn up model provisions for the settlement of copyright problems arising from the use of computers for access to or the creation of works protected by copyrights. It considered that the development towards international computerized information systems and the increasing transborder flow of data make it

highly desirable to harmonize international views on the settlement of copyright problems arising from the use of computer systems for access to or the creation of works, and to achieve cooperation among States on common and practical solutions in this connection. The Committee's opinion was that the use of computer systems for access to, or the creation of, protected works should be governed by the general principles of copyright protection as laid down in particular in the international copyright conventions. They also felt that such use does not currently require amendments to these principles; and that those of users of the protected works, in order to stimulate creativity of authors and not to hamper the dissemination of works by means of computer technology.

The results of the Committee's work were published and reported to the 1983 sessions of the Executive Committee of the Berne Convention and the Intergovernmental Committee of the Universal Copyright Convention.

2 (i) The General Agreement on Trade and Tariffs (GATT)

There is growing interest, particularly in the United States, in trade in services, including data processing and telecommunications services. The United States is focussing attention on issues in this area in the GATT, and other international fora including the OECD, that deal with international trade. The GATT Ministerial in November 1982 decided to consider the question of trade-in-services at their 1984 session at which time pertinent national studies undertaken in the interim will be considered.

At this time, it is premature to predict the positions that governments might take and the direction of the discussions. One area of attention will likely relate to whether data flows can be treated as a commodity. There have been some suggestions that there could be harmful effects in the data processing field from a form of "dumping" for which there is now no redress similar to that which exists in the now classical world of the trade in goods.

2 (j) International Chamber of Commerce (ICC)

The ICC has begun to consider issues pertaining to the liberalization of trade in services, including trade in data and data services, as part of its advocacy and promotion of the free flow of goods and capital. The ICC Commission on Computing, Telecommunications and Information Policies was established in 1981 and provides a forum for suppliers and users of hardware, software and value-added

services to discuss TBDF and telecommunications issues. Among topics currently being examined by the ICC are questions relating to international private circuits and related public facilities, and recommendations on international and national aspects of business data flows.

3. The USA

Canada and the USA are each other's largest trading partner. Each country is the recipient of the lion's share of the other's investment abroad; intra-corporate links are extensive. As a consequence, the flow of data across the border is probably larger between Canada and the United States than between any other two countries. Greater access to third country markets is important but TBDF is so substantial with the USA that this question must be looked at primarily from the point of view of its domestic and bilateral considerations.

There is enormous scope for cooperation and profitable business on both sides. At the same time, the asymmetry of the two countries, particularly in terms of economic power raises the same concerns for Canada in this field of economic activity as are apparent in the more traditional sectors, i.e., the development of innovative Canadian industry in competition with usually larger American firms, access to markets, specialization, ownership, extraterritoriality, the maintenance of cultural identity and the preservation of national sovereignty. American policies and attitudes in this area obviously can have a major impact upon Canadian interests. Similarly, Canadian policies and attitudes can effect U.S. interests as well, both directly and as the example they might set for others.

The U.S. attitude to TBDF tends to be formed, in part, from the values embodied in the First Amendment to U.S. Constitution as they relate to the concept of the freedom of speech and of the press. The Americans draw direct links between the "free flow" of data and information and freedom of speech. While the Administration has endorsed the OECD guidelines on privacy the view is widely held in the U.S., particularly in Congress, that any regulation of TBDF threatens individual rights. To quote from a 1980 Congressional Committee on Government Operations report entitled International Information Flow: Forging a New Framework, "Even barriers intended to protect the economic well being of a nation's citizens will diminish political and civil rights. Of equal importance, restrictions on the flow of information for the purpose of protecting individual

rights, such as privacy, can damage those rights". According to this view even privacy laws, however well-intentioned, conflict with fundamental human rights and derogate from the First Amendment. Thus what might be considered as a necessary regulation by other countries could be seen by the U.S. as a barrier or restriction to the "free flow" of data.

The United States is home to a very large number of multinational enterprises and, as such, is a principal beneficiary of an open international trading and investment system. U.S. opposition to restrictions on "free flow" is therefore motivated, in part, by a desire to safeguard the commercial interests of U.S. firms. To quote again from the 1980 report of the Congressional Committee on Government Operations, "barriers to the international flow of information injure the ability of U.S. enterprises to compete in foreign and international markets... The public interest to be represented by U.S. policy lies largely in assuring the free flow of information throughout the world and the fair and equitable treatment of American enterprises and individuals". Indeed, the report concluded that barriers to the international flow of information also threatened all sectors of the economy. The Committee pointed out that what was at stake was "not simply some mythical number in the balance of trade, but jobs, opportunities for growth and a healthy slice of the economic future of this country".

This U.S. concern extends beyond the telecommunications and information goods and services industries, a sector which accounts for one of the largest shares of U.S. exports, to all U.S. industrial and commercial enterprises operating internationally who use data processing and international communications networks. It is for these reasons that the USA saw concerns about the protection of privacy, arising primarily in Europe, as masking economic objectives and strove to ensure that the OECD guidelines on personal data did not provide a cloak for protectionism.

There is widespread agreement in the USA on the desirability of the "free flow" of data across borders as an objective, though a consensus has not yet emerged amongst the Administration, the Congress and industry on how to achieve it. While there are exceptions in certain sectors, the majority of U.S. companies oppose measures that would in any way limit their freedom of action with regard to communications and data processing. The Administration and Congress broadly subscribe to this view except in situations where national security considerations take priority. This has led on occasion to conflict between commercial and

national interests particularly in the area of transfer of technology. The US Chamber of Commerce has drafted a "Statement of Principles which should Govern International Information Flow." The objective of these principles is to provide a framework for the development of a global information system which would "stimulate international trade through the freest flow of information across national boundaries". Along similar lines, the USA is pressing for a "Data Declaration" in the OECD context. This would be a commitment to avoid restrictive measures and to maintain an open system of data flows.

Though the USA is the principal architect of the international trading and payments system, it believes that it has given more than it has received in the postwar dismantling of barriers to trade. Furthermore, while Americans consider access to the U.S. market as now relatively open, they feel rightly or wrongly, that other countries are either failing to live up to international trade agreements or are evading them through the use of non-tariff barriers. Japan has been the objective of particular concern in this regard and Canada, Brazil, France and the EEC, among others, have also been criticized.

The result is a disposition to pursue American interests aggressively, including in respect of trade in services generally, which is of central importance to the U.S. balance of payments. Attention is also focussed on what are considered to be the trade-distorting effects of the policies established by other countries in the equally important field of foreign investment. Both have direct implications for TBDF. In areas where agreed rules do not exist or where they are felt to be inadequate, the U.S. is seeking new or broader discipline. (The complex of US laws and practices which effectively control the extent of foreign investment in the USA are not always recognized by the U.S. as barriers.) Work will go forward in both of these areas at the OECD and in the GATT context in the coming months and years and will have important consequences for TBDF.

Consistent with the current US marketplace approach to domestic telecommunications, Congress and the FCC have sought to lessen government regulation of communications services on the international level and to adapt existing regulation to the changing market. The draft Senate bill on trade in services, "Reciprocal Trade and Investment Act of 1982", ("Danforth Bill"), includes within its definition of "barriers to, or other distortions of, international trade in services":

"(1) direct or indirect restrictions on the transfer of information into or out of, the country or instrumentality concerned, and (2) restrictions on the use of data processing facilities within or outside of such country or instrumentality."

The Bill also seeks to strengthen the President's authority to protect U.S. industry from unfair foreign practices and authorizes regulatory agencies to take foreign market access questions into account when ruling on whether foreign entities can enter the U.S. market. In other words, the Bill would permit the USA to restrict TBDF with countries in order to establish reciprocity (although the word is not used in the Bill) with foreign practices on TBDF. A number of pieces of "reciprocity" legislation which relate to TBDF have been introduced in the Congress over the past three years including, the "Telecommunications Competition and Deregulation Act of 1981" (S898), and the "Reciprocity in Trade, Services, and Investment Act of 1982" (S.2071), but none of significance have yet been passed. These measures indicate that while the US continues to be a strong advocate of "free flow" of data and information, there is a growing awareness that the question is not quite so simple, and that this awareness has been translated into action. One particularly strong action was the Dresser Industries case in 1982, where Dresser (France) was denied access to equipment specifications stored in the headquarters computer, after the President imposed sanctions on the export of pipeline equipment to the USSR.

4. Developing Countries

TBDF is emerging as an important issue of growing concern to many developing countries and can be expected to become an element in the North-South dialogue. The developing countries are not, of course, a cohesive group with a single approach to these or other issues. However, there are a number of underlying concerns which are shared by most of these countries.

A basic major concern of most developing countries is that they often lack ready access to data or information. They are particularly worried that governments and corporations in developed countries may have more knowledge about their country's resources and other factors of critical importance to decision-making than they themselves possess. Another major difficulty which affects their ability to access information is the frequent lack of adequate expertise which would permit them to organize, analyze and apply the data and information, even if available. Taken together, this creates a situation where many

developing countries consider that they are in a disadvantageous position in bargaining and negotiating with foreign governments and corporations, especially when this concerns their own resources. This is leading to demands in some countries for prior consent before data and information concerning a country can be exported.

In a world which is rapidly becoming an information society, the developing countries fear that the gap between the developed or "information rich" nations and the developing or "information poor" nations will become even greater. Many accept that a growing interdependence among nations is inevitable, but they are fearful that interdependence among unequal partners will lead to an erosion of their sovereignty.

Brazil is a developing (or more accurately perhaps, "newly industrialized") country which is notable for adopting policies of both an industrial development and national sovereignty nature concerning TBDF. These are based on the belief that the position that countries will establish for themselves in the "new international economic order" will be dictated by the care with which they have established their respective policies on transborder data flow. The basis for these policies is that Brazil considers it "fundamental that a country have control over the information resources essential to its sovereignty and development". A regulation was adopted in 1978 requiring government approval before international data communications facilities could be provided. Other Brazilian policies require that all software for the smaller computers must be manufactured in Brazil and applied software for larger machines must be developed in Brazil. Where there is no Brazilian equivalent, exceptions may be permitted on the basis of cost or timeliness. Future action will be directed toward the development of Brazilian data banks rather than allowing users direct access to foreign data banks. Brazilian policies have been identified by businessmen as an impediment to doing business in Brazil, but has not yet become a major obstacle. The Brazilians have adopted the view that while transborder data flows were still small, a case by case regulatory setting can be established with relatively small inconvenience, and with the enormous advantage of permitting the gradual understanding of the problem so as to set good policies before the problem gets too big and complex.

Summary

The views of the developing countries cannot be ignored; they are becoming increasingly active and articulate players on the international economic scene. The

North-South dialogue, which is strongly supported by the Canadian government, is attempting to seek means to enable these countries to develop economically and to encourage their participation in constructive dialogue to achieve this. Given the concerns of some Canadians about TBDF, which are often similar to those of developing countries, Canada may have a role to play in this area. From a domestic interest point of view, policies in developing countries will need to be monitored to assess their implications for Canadian industry.

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