

TRADED GOODS EVALUATION STUDY

PRIOR REGULATORY REVIEW



Program Evaluation Division

June 1985

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Traded Goods Evaluation Study

Prior Regulatory Review

1. Introduction

Under the Treasury Board directive 77-47, each department must make provision for evaluation of its expenditure programs and regulations on a regular basis. In the fiscal years 1983-1985, Consumer and Corporate Affairs is undertaking a comprehensive evaluation of the Traded Goods component of the departments' activities. The Traded Goods component is comprised of activities which are intended to protect consumers against product misrepresentation, deception and fraud in the marketplace, to ensure that accurate and necessary information is provided, to enhance the ability of consumers to differentiate among product choices and maintain equity in the marketplace. These activities are mandated by legislation which has been implemented to allow the federal government to have jurisdiction in certain regulatory dimensions of the marketplace -- specifically, labelling, advertising, packaging, composition, quality and quantity. Within CCAC, these activities are carried out and the legislation is administered by the Consumer Products Branch of the Consumer Affairs Bureau.

The Evaluation Assessment Report for the Traded Goods program evaluation component was completed in December 1983. It provided for a specific evaluation of the regulations

which are administered by the Consumer Products subactivity. The regulations being examined are covered under the following acts:

- (1) Consumer Packaging and Labelling Act
- (2) Textile Labelling Act
- (3) National Trade Mark and True Labelling Act
- (4) Precious Metals Marking Act
- (5) Food and Drugs Act
- (6) Canada Agricultural Products Standards Act (CAPS).

CCAC has sole jurisdiction for the first four acts and shares jurisdiction with Health and Welfare for the Food and Drugs Act and with Agriculture Canada for the CAPS Act.

As part of the regulatory evaluation, this report will review the history of regulatory review in the federal government, assess the regulatory review work already undertaken by the Consumer Products subactivity, and outline the approach to regulatory review that is being taken by the Program Evaluation Division.

2. Background: Terms of Reference for Regulatory Review

2.1 Government-Wide Initiatives

Legislation administered by the Consumer Products Branch has been the subject of regulatory review prior to the

evaluation now being undertaken by the Program Evaluation Division. The regulatory review activities in the Consumer Products Branch have originated from a number of sources (see Chart I) including the Treasury Board Circular 77-47 entitled "Evaluation of Programs by Departments and Agencies." This circular was intended to cover both expenditure and regulatory programs.

The general area of regulatory review and reform was discussed at a meeting of First Ministers in February 1978. Following this meeting, a reference for a study of regulatory review and reform was made by the Prime Minister to the Economic Council of Canada.

The terms of the Economic Council Regulatory Reference of July 12, 1978 asked the Council to undertake a series of studies regarding both federal and provincial regulations and an examination of the areas of consultation, prior assessment, and periodic evaluation. In its interim report of November 1979 entitled "Responsible Regulation", the ECC concluded that every evaluation of regulation should address questions of the original and current objectives, the effects (economic and non-economic), and the alternative means of achieving the objectives.

Chart I

The Timing of Influential Events in the Development of the
Formalized Regulatory Review and Reform Program in the Federal Government

	1977	1978	1979	1980	1981	1982
Treasury Board Policy Circular 1977-47 issued	x					
First Minister's Meetings		x	x			
Economic Council of Canada: Regulatory Reference Study		x-----x-----x				
Office of Co-ordinator, Regulatory Reform				x----->		
House of Commons Special Committee on Regulatory Reform				x-----x		
"Government Regulation: A Situation Report and Work Plan" approved by Cabinet				x		
Ministers agreement to a work plan					x	
CCA - "Departmental Program of Regulatory Review and Reform"			x			
CCA - "Phase I report on Departmental Plan of Regulatory Review and Reform" issued					x	

Another input guiding the focus of the CCAC regulatory review program was the final report of the House of Commons Special Committee on Regulatory Reform (The Peterson Task Force). The recommendations issued in the report of December 1980 were that all proposed regulations should be subject to an appropriate impact assessment by the sponsoring agency. The report also recommended that each department should periodically review and evaluate its existing regulations to identify those which are unnecessary and outdated. They further recommended that, where overlap, duplication or conflict of regulatory requirements existed within the federal government or between federal and provincial jurisdictions, actions should be taken to remove the conflict and reduce the burden on the private sector. Immediate action was to be focussed on three areas to include food, labelling and advertising.

In 1979, the Office of Regulatory Reform was established by the government to act as a catalyst for these activities in the regulatory review and reform area.

During this period as well, the Cabinet approved a memorandum entitled "Government Regulation: A Situation Report and Work Plan" which identified the three basic components to regulatory review:

- 1) a review and housecleaning of existing statutes and subordinate regulations
- 2) further improvements to the federal regulatory process
- 3) a selective deregulation of industries or activities.

In January 1981, after studying the recommendations of the Economic Council Reference Interim Report and The Peterson Task Force Report, the Minister of the Treasury Board sought and obtained agreement of Ministers to a work-plan on Regulatory Review. As a major regulatory department, CCAC was requested to participate in this review process.

While the activities from 1977-1981 provided some direction for the regulatory review work to be undertaken by Departments, there were differences between the approach suggested by the ECC and that of the Peterson Task Force. Perhaps as a result, the Treasury Board directive left it up to each Department to determine the scope of the review to be undertaken.

2.2 Terms of Reference for CCAC Regulatory Review

The CCAC regulatory review process commenced in early 1980 prior to the Treasury Board Directive. It was co-ordinated centrally on behalf of the Deputy Minister and implemented by a Departmental Task Force comprised of repre-

sentatives of each bureau and the Special Advisor, Regulatory Review and Liaison.

A three phase action plan was developed by the Departmental Task Force and presented in a paper in February 1980 entitled "Departmental Program of Regulatory Review and Reform". It was approved by the Departmental Management Committee in May 1980. The first phase was to consist of the development of a "cataloguing matrix", the cataloguing of regulations by product group, and the preparation of a preliminary analysis of regulations indicating proposed action. The catalogue was to include an assessment of the "currency, effectiveness, clarity, and simplicity" of each regulation and an assessment of the costs of implementation, costs to consumers, and duplication or overlap. (See Annex A)

Phase II was to "concentrate on finding a process through which the interests of regulatees and beneficiaries can be heard"¹ regarding the appropriateness of various modes of regulation, and recommendations for specific regulatory reform. Phase II was also to "identify areas of industry consensus and of disparate interests relating to deregulation and other aspects of regulatory reform"².

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1. Consumer and Corporate Affairs Canada, Departmental Program of Regulatory Review and Reform, February 1980, Phase II, page 1.
 2. Ibid.

Phase III was to be the most complex. All the catalogued regulations and standards were assigned to one of the six categories identified in Phase I; retain, eliminate, further study, detailed revision, transfer, or sunset clause. Regulations would then be given priorities for action. Phase III would undertake the actual development of changes to the regulations and standards that had been identified as requiring modification or some form of follow-up action.

The CCAC Management Committee also agreed in May 1980 that phase I would be completed by March 31, 1981 and, by that date, Phase II would be 20% complete. As the review evolved, it seems to have become understood that it was, in reality, a two-phase process: the first phase to identify the required amendments and the second to introduce proposed amendments and guide them through the consultation and approval process.

3. Findings

3.1 Consumer Products Branch and the Regulatory Review Workplan

The review carried out by the Consumer Products Branch of its regulations in Phase I was dependent upon the expertise and personal knowledge of the program officers in the Branch. Although a checklist of relevant issues had been

prepared by the Regulatory Review officer, due to time and cost constraints within the Branch, these questions became "something to be kept in the back of the mind while reviewing regulations in house and is not to be used as a rigid formula for generating busy work responses."³

Due to the lack of documentation regarding the nature of the review actually carried out under Phase I, it is impossible to confirm that these questions were actually addressed by the program officers in their review. However the program officers who reviewed the regulations were well aware of the ongoing concerns related to each regulation.

No direct industry consultations were to be held in Phase I, since consultations with interested parties were scheduled to be held in Phase II. However, input dealing with certain regulations was received from some regional offices, and, through these regional files, some industry input would have been considered. In this manner, some aspects of the Textile Labelling and Advertising Regulations and the Consumer Packaging and Labelling Regulations were considered in all regions, while the Food and Drugs Regulations were considered by the Ontario regional office in Phase I.

3. Memo from J.L. Armstrong, Regulatory Review Officer, CCAC, dated July 10, 1980.

3.2 Regulations Not Included in the Formal Review

Within the Consumer Products Branch, certain specific exclusions were made to the review process undertaken in 1980. The Precious Metals Marking Regulations were not included since a review had already been initiated in conjunction with the Canadian Jewellers Association in 1979 and the first round of proposed amendments was scheduled for prepublication in the Canada Gazette Part I in May 1981.

Two facets of the Consumer Packaging and Labelling Regulations and the Food and Drugs Regulations were explicitly not subjected to the formal review exercise. These were the bilingual requirements for labelling of products and the metric conversion requirements. The bilingual requirements had recently been assessed by the department and as a result the Minister made a decision not to propose any changes. Regarding the metric measurement provisions, a separate initiative was underway to ensure that all regulations were expressed in metric units of measurement.

As well, the Energuide Provisions, and the Canada Care Labelling Program were not considered in this review. The Energuide Regulations were relatively new and a sunset clause was being considered, while the Care Labelling Program was to be subjected to a review in conjunction with the CGSB in 1981/82. Other than these noted exceptions, all

regulations under the jurisdiction of the Consumer Products Branch were to be reviewed.

3.3 Results of Phase I Review

The result of the Phase I review work was a section-by-section review of the regulations under five acts administered by the Branch. (See tabular summaries in Annex B)

With respect to all the regulations reviewed, there were no regulations which were so clearly seen as a nuisance, unenforceable, or contradictory that they were recommended for immediate repeal through the annual omnibus bill. The recommendations were mostly to retain the regulations as written or for further study of a substantive nature. The recommendation for further study could involve many types of follow-up, from consultation with other departments, governments, consumers, or experts, to a cost-benefit or impact study.

According to the Phase I Report of July 1981, the number of regulations which were scheduled for further study following Phase I comprised less than 10% of the CAPS Regulations, 30% of the Consumer Packaging and Labelling Regulations, 70% of the Textile Labelling and Advertising Regulations, and 80% of the Food and Drugs Regulations (see Table I. These sections requiring further study were

Table II
CCA Regulatory Review Phase I,
Summary of Recommended Action by Act

Recommendation**	<u>Food and Drugs Act</u>	<u>CAPSA</u>	<u>Consumer Packaging and Labelling Act</u>	<u>Textile Labelling Act</u>	<u>National Trade Mark and True Labelling Act</u>	<u>Precious Metals Marking Act</u>
Retain as Written	290*	536	29	13	8	10
Further Study- housekeeping	135	15	-	1	-	-
Further Study- substantive	155	21	9	31	53	-
Amend	7	-	2	-	11	6
Repeal	2	-	1	-	-	-
Total Section Examined	589	572	41	45	72	
Total Sections in Act			44	45		16
Total Schedules	8		3	3		-

Source: Phase I Results - Summary sheets.

* Numbers indicate number of sections.

** Definitions of each recommended action are indicated in Appendix G.

assigned target dates for completion under Phases II and III. Examples of the regulations needing further study were labelling of piece goods, generic names for textile fibres, and standardization of container sizes. For the most part these regulations noted for further study had already been brought to the attention of Branch officers and were in some cases, already under review by the Branch prior to commencing the formal Regulatory Review.

With respect to the Consumer Packaging and Labelling Regulations, the National Trade Mark and True Labelling Regulations and the Textile Labelling Regulations, the Phase I review resulted in a set of summary sheets for each set of regulations. For each regulation a recommendation for action was made from five designated categories: retain as written, further study (substantive), further study (housekeeping), amend, repeal. The type of consultation to be undertaken, and the estimated completion date were also specified.

Many of the sets of regulations under the National Trade Mark and True Labelling Act such as the Chamois Labelling Regulations, Turpentine Labelling Regulations, and Fur Garment Labelling Regulations were reviewed as a whole, and not on a section-by-section basis. For these, it was indicated in the Phase I Report that the need for such regula-

tions had been questioned by the Review Officer and that coverage may be otherwise available under the Consumer Packaging and Labelling Regulations. Examination of other regulations, such as the Watch Jewels Marking Regulations concluded that voluntary standards should be considered as an alternative for the future.

With respect to the review of the Consumer Packaging and Labelling Regulations and Textile Labelling Regulations, specific sections were noted for further work and some explanation was given of the problems identified and study required. Further work as defined in the Phase I Report could include further consultation, impact assessment or cost-benefit studies.

3.4 Issues Unresolved or Outstanding

In general, the Phase I review for these regulations did not constitute a comprehensive regulatory evaluation as envisioned by the Peterson Task Force or the Economic Council. No specific mention was made of the evaluation issues of on-going rationale, objectives achievement, impacts or alternatives. Furthermore, it seems unlikely, though no documentation exists, that these broad evaluation issues were not explicitly raised nor examined in this review.

During this 1981 CCAC regulatory review, the CAPS and Food and Drugs Regulations over which the Department does not have sole jurisdiction were examined at a technical level looking at the specific subsections. When examined at the technical level, each regulation appeared legitimate and useful to the reviewing officer. However, part of the review mandate was to consider the broader issues -- for example, could this area be transferred to the industry for self-regulation? Does the original problem which this regulation was designed to correct still exist in the marketplace?

This level of evaluation was not undertaken for these regulations. Basically, the Phase I review process for these regulations resulted in an inventory of existing regulations and proposed some technical changes. This prior work provided a foundation on which a broader or more in-depth analysis and follow-up action could be undertaken by Agriculture Canada, Health and Welfare or CCA for the Food and Drugs regulations or CAPS regulations under their jurisdiction.

It seems that a comprehensive regulatory evaluation work as outlined in the 1980 Departmental Plan is no longer

ongoing in the Branch. According to Branch memos,⁴ there has never been formal approval to proceed with the comprehensive consultation as originally specified in Phase II. There also appears to be lack of agreement by senior managers regarding whom should take responsibility for follow-up in this formal regulatory review process and what the nature of this follow-up should be. One of the recommendations of the Phase I report of July 1981 was that regulatory evaluation should be integrated with the other evaluation tasks and be carried out by the Program Evaluation Division.

3.5 Follow-up to Phase I of the Regulatory Review Plan

Although the consultation envisioned under Phase II of the Departmental plan which was to look at broad areas of rationale, objectives impacts, and effects has not been undertaken, some of the follow-up work recommended in Phase I has begun. This includes:

- 1) Textile Labelling Regulations; consultation is ongoing on:
 - a) definition of country of origin

4. Series of memos on subject of Phase II: Nov. 5, 1981 T.R. Robinson to M.F. Hendricks; Jan. 22, 1981, M.F. Hendricks to T.R. Robinson; Feb. 9, 1982, R. McKay to M.F. Hendricks; Feb. 15, 1982, T.R. Robinson to M.F. Hendricks, March 1, 1982, M.F. Hendricks to T.R. Robinson; March 16, 1982, H. McIlroy to T.R. Robinson.

- b) down and feather labelling regulations
- c) stuffed articles labelling

2) National Trade Mark and True Labelling Regulations:

- a) decision to retain Babcock Test Bottle and Pipette regulations has been made
- b) Canada Standard Measuring Cups Regulations is in final consultation phase regarding repeal
- c) Chamois and Turpentine Regulations are under consideration for repeal

3) Food and Drugs Regulations:

- a) Further study recommended by the review is now included in the Branch workplan, including:
 - i) nutritional labelling for food
 - ii) durability dating
- b) Consultation begun before 1980 continues on:
 - i) use of the term natural
 - ii) declaration of sweeteners in the list of ingredients

4) CAPS Act Regulations

The responsibility of CCAC in the review process terminated with the completion of Phase I and the forwarding of the recommendations to Agriculture Canada. To date CCAC has been consulted regarding revisions to Processed Eggs and Poultry Regulations.

Regulatory review work is undertaken through the ongoing process of consumer and industry liaison within the Consumer Products Branch in which program officers deal mainly with complaints which arise on a daily basis. No specific regulatory amendments which were identified as a result of the 1980 review have been completed and approved. As noted above, some proposals arising from this review have been introduced to the interested parties through departmental communiqués and other consultation and are included in the Branch workplan.

A formal process for the evaluation of new regulations was put in place by Treasury Board in 1978. According to Chapter 490 of the Treasury Board Administrative Manual, the introduction of a "major" regulation in the areas of health, safety and fairness with cost implications for the private sector of over \$10 million must now be subjected to a formal socio-economic impact assessment. In this assessment, a cost-benefit analysis is to be carried out. This new requirement meets the recommendations of the Economic Council and others for the evaluation of new regulations.

To date no SEIAs have been required for regulations administered by the Consumer Products Branch. For minor regulations, any socio-economic evaluation is completed on an informal basis since no SEIA is required. The broader

questions identified by the Economic Council regarding objectives, consequences and alternatives to new regulations may also be implicitly addressed by the Branch and interested parties during the consultation regarding regulatory amendments of a major or minor nature.

In addition to the ongoing Consumer Products Branch regulatory review which deals with day-to-day problems arising from enforcement of regulations in a constantly changing market, there still remains the need to undertake a more comprehensive regulatory review, as envisaged by the Departmental Plan in Phase II and III, addressing the role of regulation, its objectives achievements, impacts and alternatives.

As noted, the Phase I report recommended that this responsibility for regulatory review be integrated with the other evaluation tasks and carried out by the Program Evaluation Division of the Department as part of its ongoing responsibility in the course of evaluating Departmental programs. As a result, in the design of the Evaluation Framework for the Traded Goods component a regulatory review has been included.

4. The Program Evaluation Division Traded Goods Evaluation Study and Regulatory Review

Within the Traded Goods Evaluation Study it has been proposed to assess the rationale, impacts and effects of specific regulations administered by the Consumer Products Branch and relating to the textile and food sectors.

Several independent study modules have been designed including interviews and case studies. Through these different approaches information will be collected principally on the rationale but additionally on the impacts of these regulations. The ongoing rationale issue may address such questions as: the current socio-economic conditions compared with the original conditions which lead to the institution of the regulations; who benefits from and who pays for the regulations; and the current perception of the government's role in the marketplace with respect to packaging, labelling and composition regulations.

Since it is acknowledged to be difficult to accurately measure the impacts of such regulations in a quantitative manner, the data to be collected on impacts will be mostly of a qualitative nature.

In general the evaluation study modules will undertake to assess the role of these regulations and their impacts on

a relatively more comprehensive and less technical level than was done by the regulatory review within the Consumer Products Branch in 1980-81.

Although the need continues for an ongoing day-to-day review of specific regulations by Branch officers, this evaluation study will provide a unique opportunity to examine the concepts and rationale which underlie the regulations, and enquire more deeply into the perceptions of the need for and impact of the regulations.

5. Conclusions

This paper has sought to document the history of regulatory review initiatives within the federal government and the implementation of such a review process by the Consumer Products Branch of CCAC.

Following the major review undertaken in 1980, there has been no formal follow-up. In an informal sense, review of regulations is undertaken on a daily basis by Branch officers who deal with industry and consumers to assess regulatory problems and design specific amendments. The responsibility for a comprehensive review of the role of regulation in CCAC activities has been delegated to the Program Evaluation Division to be included as part of the formal evaluation process. Building on the technical

reviews carried out by the Consumer Products Branch in 1980, the Traded Goods Evaluation is attempting to assess the rationale for specific regulations and their impacts, in a manner recommended by the Economic Council, Peterson Task Force, and the Minister of the Treasury Board.

The guidelines set out by the Office of the Comptroller General in the "Principles for the Evaluation of Programs by Federal Departments and Agencies" are also applicable to regulatory evaluation. An evaluation undertaken by the Program Evaluation Division according to these principles will be credible and acceptable to the central agencies which are interested in the results.

ANNEX A

PHASE I REGULATORY REVIEW

PROPOSED CATALOGUING PROCEDURE

Annex A
Phase I Regulatory Review
Proposed Cataloguing Procedure

A. Nature and purpose of the regulation

1. Identify the nature of the conditions that brought about regulatory intervention.
2. Do the conditions still prevail, or would they prevail in the absence of regulation?
3. Do you anticipate that any exogenous factors, e.g., economic, technological, will render the regulation superfluous in the near future?
4. What are the explicit objectives of the regulation?
5. Have there been any unwanted consequences not envisioned in the legislation?
6. Does the regulation conflict with or overlap any other federal or provincial regulations?
7. Provide a brief outline history of the legislation.

B. Scope of the Regulation

1. Estimated value of the goods and/or services subject to the regulation.

2. Estimated number of individuals or firms subject to the regulation.
3. Estimated number of beneficiaries.*
4. Estimated value of the regulation to the beneficiaries; high, medium, low.**

* Consumers of the regulated product or service

** An appropriate dollar range will be assigned at a later date.

C. Cost of Regulation

1. Budget of the regulatory authority.
2. Cost of compliance, high medium, low.
3. Cost of the regulation to the beneficiaries; high, medium, low.

This category should be restricted to higher prices that may be directly attributed to the regulation.

D. Perceptions of the Regulation***

1. Identify the primary benefit(s) of the regulation as seen by:
 - (a) regulators
 - (b) regulatees
 - (c) beneficiaries

2. Identify the primary disadvantage(s) of the regulation as seen by:

- (a) regulators
- (b) regulatees
- (c) beneficiaires

*** It is important that these points represent to the extent possible positions or stated feelings of the different parties.

ANNEX B

TABULAR SUMMARIES OF RESULTS

OF PHASE I REVIEW

Annex B

Tabular Summaries of Results of Phase I Review

These summaries were produced by the Regulatory Review and Liaison Officer for each set of regulations. They were attached to the Phase I Report of July 1981. They contain a section-by-section recommendation for follow-up work and a suggested approach for the consultation process. These summaries are derived from the Regulatory Review Summary Sheets which were prepared by the Consumer Products Branch Officers.

As mentioned, the seven sets of National Trade Mark and True Labelling Regulations were reviewed as sets and not on a section-by-section basis.

TEXTILE LABELLING AND ADVERTISING REGULATIONS

SECTION	SUB-HEADINGS OF REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
1	SHORT TITLE	Retain	-----	-----	-----	-----	-----
2	INTERPRETATION	Further Study Required	Mail	-----			
3	LABELLING REQUIREMENTS	Further Study Required	Mail	-----			
4	ARTICLES TO BE LABELLED AS REQUIRED	Retain	-----	-----	-----	-----	-----
5	Articles to be labelled as required	Further Study Required	Mail				
6	Exemption for labelling requirements	Retain	-----	-----	-----	-----	-----
7	Exemptions for education, public utilities, etc.	Further Study Required	Mail	-----			
8	Labelling of Imports	Retain	-----	-----	-----	-----	-----
9	Second-hand articles	Further Study Required	Mail	-----	-----	-----	-----
9.1	Piece goods by mail order	Retain	-----	-----	-----	-----	-----
10	Stuffed articles - provincial	Further Study Required	Mail	-----			
	INFORMATIONS TO BE SHOWN IN LABEL						
11	Information	Further Study Required	Mail	-----			
12	Dealer Identification	Further Study Required	Mail	-----			

TEXTILE LABELLING AND ADVERTISING REGULATIONS

SECTION	SUB-HEADINGS OF REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION PH. II	PH. III
	MANNER IN WHICH INFORMATION IS TO BE SHOWN						
13	Legibility and size type	Retain	-----	-----	-----	-----	-----
14	Manner of display	Further Study Required	Mail	-----			
15, 16, 17	Readily accessible	Retain	-----	-----	-----	-----	-----
18	Remnants	Further Study Required	Mail	-----			
19	Piece Goods	Further Study Required	Mail	-----			
	FORM OF LABEL AND MANNER OF APPLICATION						
20	Thread, yarn, twine	Retain	-----	-----	-----	-----	-----
21	Wrappers, packages, containers	Retain	-----	-----	-----	-----	-----
22, 23, 24	ADVERTISING REQUIREMENTS	Further Study Required	Mail	-----			
25	MANNER IN WHICH TEXTILE FIBRE CONTENT IS TO BE SHOWN	Further Study Required	Mail	-----			
26	GENERIC NAMES FOR TEXTILE FIBRES	Further Study Required	Mail	-----			
27	TEXTILE FIBRE FOR WHICH NO GENERIC NAME HAS BEEN PRESCRIBED	Further Study Required	Mail	-----			

TEXTILE LABELLING AND ADVERTISING REGULATIONS

SECTION	SUB-HEADINGS OF REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
28, 29, 30	AMOUNT OF TEXTILE FIBRE	Further Study Required	Mail	-----			
	TEXTILE FIBRE CONTENT						
31	Textile fibre content	Further Study Required	Mail	-----			
32, 33	Unknown & reprocessed fibres	Retain	-----	-----	-----	-----	-----
34	SECTIONS	Further Study Required	-----	-----	-----	-----	-----
35	PILE FABRICS	Further Study Required	Mail	-----			
36	TRIMMINGS	Further Study Required Housekeeping	-----	-----			
37, 38	LININGS, INTERLININGS, PADDINGS AND FINDINGS	Further Study Required	Mail	-----			
39	FINDINGS	Further Study Required	Mail	-----			
40	TRADE MARKS & DESCRIPTIVE TERMS	Further Study Required	Mail	-----			
41 - 45	FALSE OR MISLEADING REPRESENTATION	Further Study Required	Mail	Yes			
					12	82/83	83/84

NOTE: As a result of the initial mailing in the consultation phase, meetings may be required.

CONSUMER PACKAGING AND LABELLING REGULATIONS

SECTION	REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
1, 2	Short Title & Interpretation	Retain	-	-	-	-	-
3	Exemptions from all provisions of the Act	Further Study Required	mail	-			
4	Exemptions from sections 4, 5, 6, 8 and 10 of the Act	Retain	-	-	-	-	-
5	Exemptions from section 4 and Subparagraph 10(b)(ii) of Act	Further Study Required	mail				
6	Bilingual Requirements and Exemptions	(Test Market Provisions only)	mail	-			
7, 8, 9, 10, 11	Application of label to Prepackaged Product	Retain	-	-	-	-	-
12, 13	Part of label on which information is to be shown	Retain	-	-	-	-	-
14, 15, 16	Size of Type in which Information to be Shown	Retain	-	-	-	-	-
17	Declarations of Net Quantity	Retain	-	-	-	-	-
18	Exemption from Net Quantity Declaration	Retain	-	-	-	-	-
19	Exemption from Metric Net Quantity Declaration and Type Size Requirement	Retain	-	-	-	-	-

CONSUMER PACKAGING AND LABELLING REGULATIONS

SECTION	REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
21, 22	Manner of Declaring Net Quantity	Further Study Required (section 23 only)					
23	Manner of Declaring Net Quantity	Repeal (Item 10 of Table to 22(1) only)	mail	-			
24, 25, 26 27, 27.1	Units of Measurement	Retain	-	-	-	-	-
28	Prepackaged Products Consisting of Prepackaged Products Packaged Separately	Retain	-	-	-	-	-
29	Advertisements	Repeal 29(2) only Amend 29(1) only					
30, 31	Name and Other Information	Amend 31(2) only					
32	Exemption from Subparagraphs 10(b)(i) and (ii) of the Act	Retain	-	-	-	-	-
33	Representation as to Number of Servings	Further Study Required	mail	-			
34	Pictorial Representations on Food Labels	Further Study Required	mail	-			
35	Declaration of Nominal Volume	Retain	-	-	-	-	-
36	Standardization of Container Sizes	Further Study Required (all) Amend (36(1)(i)(i) and 36(5) only	mail	-			

CONSUMER PACKAGING AND LABELLING REGULATIONS

SECTION	REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
37	Capacity of Receptacles	Further Study Required	mail	-			
38	Tolerances	Retain	-	-	-	-	-
39, 40	Inspectionn	Further Study Required (section 39 only)	mail	-			
					12	82-83	84-85

- NOTES: 1) Section 20 has been revoked and the number remains unused.
 2) As a result of the initial mailing in the consultation phase, meetings may be required.

NATIONAL TRADE MARK & LABELLING REGULATIONS

SECTION	REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	National Trade Mark Greament Sizing Regulations	Amend	Mail	-			
	Babcock Test Bottles and Pipettes Regulations	Retain	-	-	-	-	-
	Canada Standard Measuring Cups and Spoons Regulations	Further Study Required	Mail	Yes			
	Chamois Labelling Regulations	Further Study Required	Mail	Yes			
	Turpentine Labelling Regulations	Further Study Required	Mail	Yes			
	Fur Garment Regulations	Further Study Required	Mail	Yes			
	Watch Jewels Marking Regulations	Further Study Required	Mail	Yes			
					9	82-83	84-85

NOTE: As a result of the initial mailing in the consultation phase, meetings may be required.

FOOD AND DRUGS REGULATIONS

SECTION	REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST.PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	Part A	Further study	Mail & Meetings	No	0.5	1982	1983
	Part B Division 1	Further study	Mail & Meetings	Yes	6.0	1983	1985
	Part D	Further study	Mail & Meetings	Yes	6.0	1984	1985
	Part E	Further study	Mail & Meetings	No	0.5	1982	1984

FOOD AND DRUGS REGULATIONS

REGULATION FOOD & DRUG REGULATIONS	RECOMMENDATION	CONSULTATION PROCESS	C.R.E.B. SUPPORT	EST. P.M. C.P.B.	EST. COMPLETION	
					PH. II	PH. III
Part B:						
Division 2	Further study	Mail & meetings	No	0.75	1983	1984
Division 3	Further study	No label changes				
Division 4	Further sutudy	Mail & meetings	No	0.5	1984	1985
Division 5	Further study	Mail & meetings	Yes	0.75	1983	1985
Division 6	Further study	No label changes				
Division 7	Further study	Mail & meetings	Yes	2	1983	1985
Division 8	Further study	Mail & meetings	Yes	6	1983	1985
Division 9	Further study	Mail & meetings	No	2	1982	1984
Division 10	Further study	Mail & meetings	No	6	1983	1985
Division 11	Further study	Mail & meetings	No	6	1983	1985
Division 12	Further study	Mail & meetings	No	2	1983	1984
Division 13	Further study	Mail & meetings	Yes	5	1983	1985
Division 14	Further study	Mail & meetings	Yes	5	1983	1985
Division 15	Retain					
Division 16	Retain					
Division 17	Further study	Mail & meetings	No	2	1983	1985
Division 18	Further study	Mail & meetings	No	4	1983	1984
Division 19	Further study	Mail & meetings	No	3	1983	1984
Division 20	Further study	Mail & meetings	Yes	2	1983	1984
Division 21	Further study	No label changes				
Division 22	Further study	Mail & meetings	Yes	4	1983	1985
Division 23	Retain					
Division 24	Further study	Mail & meetings	Yes	6	1983	1985
Division 25	Further study	Mail & meetings	No	4	1984	1985

CANADA AGRICULTURAL PRODUCTS STANDARDS REGULATIONS

SECTION	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST.PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	Fresh Fruit & Vegetables				1.6		
1-2	Short Title & Interpretations	Retain	-	-	-	-	-
3	Part I: Grades & Standards	3(1) Retain, 3(2) & 3(3) Further Study (substantive)		-		83-84*	84-85
4-8	Part II: Packaging	4(2) Further Study (substantive) 4(1) & 5-8 Retain					
9-26	Part III: Application Marking	9-23 & 25-26 Retain 24 Further Study (housekeeping)		-		82-83*	83-84
27-29	Part IV: Interprovincial Trade	Retain	-	-	-	-	-
30-34	Part V: Exports	Retain	-	-	-	-	-
35-39	Part VI: Imports	Retain	-	-	-	-	-
40-43	Part VII: Inspection	Retain	-	-	-	-	-
44-48	Part VIII: Seizure and Detention	Retain					
49-55	Part IX: Fees	Retain	-	-	-	-	-
59-65	Part X: Registered Produce Warehouses	Retain	-	-	-	-	-

CANADA AGRICULTURAL PRODUCTS STANDARDS REGULATIONS

SECTION	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST.PM, CPB	EST. COMPLETION	
						PH. II	PH. III
1-66	Schedule I - Table I	Retain	-	-	-	-	-
1-80	Schedule I - Table II	1-66 and 71-80 Retain 67-70 Further Study (substantive)		-		83-84*	84-85*
	Schedule II - Standard Packages	Retain	-	-	-	-	-

* Phase II and III activities turned over to Agriculture Canada with revision recommendations for their implementation at the conclusion of Phase I. Completion dates represent our estimate of likely A.C. implementation timing.

CANADA AGRICULTURAL PRODUCTS STANDARDS REGULATIONS

SECTION	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	Processed Fruit & Vegetables				.8		
1-2	Short Title and Interpret.	Retain	-	-	-	-	-
3-9	Part I: Grades & Standards	3-8 Retain, 9 Further study (substantive)		-			
10-19	Part II: Registration of Establishments	Retain	-	-	-	-	-
20-30	Part III: Packing	Retain	-	-	-	-	-
31-47	Part IV: Marking	Retain	-	-	-	-	-
48-51	Part V: Inspection and Certification	Retain	-	-	-	-	-
52-55	Part VI: Export and Interprovincial Trade	Retain	-	-	-	-	-
56-64	Part VII: Imports	Retain	-	-	-	-	-
65-69	Part VIII: Seizure and Detention	Retain	-	-	-	-	-
	Schedules I & II	Retain	-	-	-	-	-

CANADA AGRICULTURAL PRODUCTS STANDARDS REGULATIONS

SECTION	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	Dairy Products Regulations				1.7		
1-2	Short Title & Interpretation	1 Retain 2 Further Study (substantive)		-		83-84*	84-85
3-23	Part I: Standards	3-11 & 14-15 & 17-18 & 20-21 & 23 Retain 12, 13, 16, 19, 22 Further study (substantive)		-		83-84*	84-85
24-73	Part II: International and Interprovincial Trade	Retain	-	-	-	-	-
74-81	Part III: Administration	74-76 and 80-81 Retain 77-79 Further study (housekeeping)		-		83-84*	83-85
	Schedules I - VII	Retain	-	-	-	-	-

* see note Fresh Fruit & Vegetables table

CANADA AGRICULTURAL PRODUCTS STANDARDS REGULATIONS

SECTION	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	Egg Regulations				3.2		
1-2	Short Title & Interpretation	Retain	-	-	-	-	-
3-9	Part I: Grade Names Grading	3 Further Study (substantive) 4-9 Retain		-		83-84*	84-85*
10-13	Part II: Packing	Retain	-	-	-	-	-
14-22	Part III: Marking	Retain	-	-	-	-	-
23-25	Part IV: Inspection and Certification	Retain	-	-	-	-	-
26-29	Part V: Export and Interprovincial Trade	26-29 Retain 27-28 Further study (substantive)		-		83-84*	84-85*
30	Part VI: Imports	Retain	-	-	-	-	-
31-32	Part VII: Reports	Retain	-	-	-	-	-
33-37	Part VIII: Seizure & Detention	33 Further Study (housekeeping) 37-37 Retain		-		82-83*	83-84*
	Schedule I	Further study (subst.)		-		83-84*	84-85*
	Schedule II	Further study (subst.)		-		83-84*	84-85*
	Schedule III	Further study (subst.)		-		83-84*	84-85*
	Schedule IV	Further study (subst.)		-		83-84*	84-85*

*See note Fresh Fruit & Vegetables table

CANADA AGRICULTURAL PRODUCTS STANDARDS REGULATIONS

SECTION	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	Processed Poultry Regulations				.8		
1-2	Short Title & Interpretation	Retain	-	-	-	-	-
3-26	Part I: Standards	3 & 5-8 & 10-19 & 23-26 Retain 4 & 9 & 20-22 Further study (housekeeping)		-		82-83*	83-84
27-31	Part II: International and Interprovincial Trade	27-30 Retain 31 Further Study (housekeeping)		-		82-83*	83-84
32-38	Part III: Administration	Retain	-	-	-	-	-

*See note Fresh Fruit & Vegetables Table

CANADA AGRICULTURAL PRODUCTS STANDARDS REGULATIONS

SECTION	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION PH. II	EST. COMPLETION PH. III
	Maple Products Regulations				1.6		
1-3	Short Title, Interpretation and Application	Retain	-	-	-	-	-
4-8	Part I: Grades and Grading	Retain	-	-	-	-	-
9-10	Part II: Packing	Retain	-	-	-	-	-
11-12	Part III: Marking	Retain	-	-	-	-	-
13-14	Part IV: Inspection and Certification	Retain	-	-	-	-	-
15-19	Part V: Export and Interprovincial Trade	Retain	-	-	-	-	-
0-23	Part VI: Seizure, Detention and Forfeiture	20-21 Further study (housekeeping) 22-23 Retain		-		82-83*	83-84
	Schedule I	Further study (subst.)		-		83-84*	84-85
	Schedule II -n IV	Retain	-	-	-	-	-
	Schedule V	Further study (housekeeping)		-		82-83*	83-84

*See note Fresh Fruit & Vegetables

CANADA AGRICULTURAL PRODUCTS STANDARDS REGULATIONS

SECTION	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	Processed Egg Regulations				.4		
1-2	Short Title & Interpretation	Retain	-	-	-	-	-
3-16	Part I: Grades and Grade Requirements	Retain	-	-	-	-	-
17-22	Part II: Interprovincial and International Trade	Retain	-	-	-	-	-
23-29	Part III: Administration	23-24 and 26-29 Retain 25 Further Study (housekeeping)		-		82-83*	83-84
	Schedule I	Retain	-	-	-	-	-
	Schedule II	Retain	-	-	-	-	-

*See note Fresh Fruit & Vegetables table

CANADA AGRICULTURAL PRODUCTS STANDARDS REGULATIONS

SECTION	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	Honey Regulations				-		
1-4	Short Title, Interpretation, Delegation of Power and Application	Retain	-	-	-	-	-
5-27	Part I: Grading	Retain	-	-	-	-	-
28-34	Part II: Packing	Retain	-	-	-	-	-
35-37	Part III: Marking	Retain	-	-	-	-	-
38-45	Part IV: Inspection and Certification	Retain	-	-	-	-	-
46-54	Part V: Imports and Exports	Retain	-	-	-	-	-
55-59	Part IV: Seizure & Detention	Retain	-	-	-	-	-
	Schedule I	Retain	-	-	-	-	-

ANNEX C

BACKGROUND DOCUMENTS

Annex C

Background Documents

Economic Council of Canada, Responsible Regulations Interim Report, November 1979.

Economic Council of Canada, Working Paper #2, Regulation Reference, Rationalizing the Regulatory Decision Making Process: The Prospects for Reform. G.B. Doern, September 1979.

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