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Direction de
la vérification,
de l'évaluation
et du contrôle

Audit,
Evaluation and
Control Branch

TRADED GOODS
EVALUATION ASSESSMENT
ANNEXES



Consommation
et Corporations
Canada

Consumer and
Corporate Affairs
Canada

DOSSIERS DE CCC
CCA FILES



TRADED GOODS
EVALUATION ASSESSMENT
ANNEXES

ANNEX A

TRADED GOODS COMPONENT PROFILE

Traded Goods Component Profile

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Traded Goods Component Profile

A program component profile is usually one major output of an evaluation assessment. It is a description of the background of the program component, including its mandate, objectives, activities, and resources, as well as a statement of the program component's structure. Much of the information in the profile is an important input into subsequent tasks of the assessment, including the determination of issues, feasible evaluation methodologies and options on further evaluation work.

This annex is the Traded Goods program component profile.

1.0 Component Mandate

The Traded Goods program component is mandated to develop appropriate standards and regulations for the composition, quantity, quality, labelling, packaging and other disclosure of information for traded goods identified under specified Acts. To this end, the program component monitors developments in the market and prepares recommendations for legislative/regulatory changes in consultation with consumer/trader associations, other departments and levels of government and international standards writing associations. It also makes available to the appropriate audience(s) full information concerning the standards and regulations.

2.0 Responsibilities

The component is responsible for the administration of a wide range of Acts and regulations, some of which come

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under the jurisdiction of other federal departments and provincial governments and others which solely come under the jurisdiction of Consumer and Corporate Affairs Canada (CCAC). In general terms, the Acts and regulations deal with composition, quantity, quality, labelling, packaging and other disclosure of information pertaining to specific traded goods.

Several Acts are administered in whole or in part by the component, as indicated below:

- Consumer Packaging and Labelling Act: The Act comes under the exclusive responsibility of Consumer and Corporate Affairs. It provides the basic rules for labelling, including the questions of standardization of package sizes, bilingual labelling, and the prohibition of false or misleading information on all consumer packages. Other legislation must be in line with this Act insofar as packaging and labelling is concerned. The energy consumption labelling on major household appliances (Energuide) also falls within the purview of this Act.
- Precious Metals Marking Act: This Act, administered in whole by Consumer and Corporate Affairs, provides standards of quality, marking and identification of precious metal articles.
- Textile Labelling Act: This Act, administered exclusively by Consumer and Corporate Affairs provides standards for the labelling and identification of textile articles.

- National Trade Mark and True Labelling Act:
The Act is fully administered by the Department. It includes Fur Labelling Regulations dealing with the prevention of fraud in labelling and advertising of fur articles, as well as the Canada standard size labelling program for textile products.

- Food and Drug Act: The administration of this Act is shared with National Health and Welfare. The Traded Goods component's role is an advisory and consultative one as regards the development of new regulations or amendments to existing ones. The interest of the component is in the conformity of labelling, advertising, nutritional claims and other information concerning foods.

- Canada Agricultural Products Standards Act:
Responsibility for this Act is shared with Agriculture Canada. This Act basically provides grade and quality standards. As with the Food and Drug Act, the component's role is mainly an advisory and consultative one as regards the development of new regulations or amendments to existing ones.

In addition to the above, the component provides advice concerning the development of standards/regulations under Acts whose responsibility lies with other federal departments. This is the case for the Meat Inspection and Fish Inspection Acts which fall under the mandate of the departments of Agriculture Canada and Fisheries and Oceans respectively.

In addition to its responsibilities relating to the specified legislation noted above, the component administers the following programs:

- Energuide
- Canadian Care Labelling Program
- Canada Standard Size Program.

These programs are briefly described in the sections below.

2.1 Energuide Program

Energuide is a national program which informs the consumer of energy conservation and money saving opportunities in the home through energy consumption labelling (kWh/month) of all major household electrical appliances. The Energuide program consists of the following elements:

- regulations under the Consumer Packaging and Labelling Act that require major household electrical appliances to carry a label stating the energy consumption of each appliance;
- energy consumption standards, test procedures and inspection activities to provide credible energy consumption ratings for each appliance model; and
- a program to inform consumers about Energuide and to educate them as to how they can conserve energy through better use, care and maintenance of existing appliance in their homes.

The labelling program provides the government with a means of intervention to remedy the general type of market

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failure arising from insufficient market information. While a regulation requires the energy consumption labelling, it makes relatively modest demands on the behaviour of appliance producers. Thus, the program is an alternative to restrictive government regulations which enforce specific design characteristics and performance standards, and which, thereby, substantially reduce the role and influence of market forces (Bushfield, 1980).*

The Department of Consumer and Corporate Affairs contracts with the Canada Standards Association (CSA) to undertake standards development, testing inspection and monitoring. In collaboration with CSA, CCAC produces Energuide Directories for major household electrical appliances which list appliances by model, manufacturer, retailer, capacity, freezing capability and energy consumption ratings. The Department of Energy, Mines and Resources assists in funding the marketing aspects of the program.

The program is intended to affect consumers, retailers and manufacturers in the following manner:

- Consumers can see the dollar savings that can be realized by choosing an appliance model that consumes less energy. As well, consumers can direct product improvement through the purchase of an appliance that consumes less energy.
- Appliance manufacturers have a distinct comparison between the energy characteristics of their products and those of their

* Bushfield, Roy, An Energy Conservation Program for Major Household Electrical Appliances, 1980.

competitors. The energy consumption figures contained within the Energuide Directories should act as a positive incentive and stimulus for manufacturers to continue to improve the energy efficiency of their product.

- Retailers use the Energuide label to help their customers in making a purchasing decision - a decision which combines energy characteristics with other physical and price features.

2.2 Canadian Care Labelling Program

The Canadian Care Labelling Program is a voluntary program which assists consumers, dry cleaners and commercial laundering establishments to select the proper cleaning procedure for a particular article with the assistance of care labels. Besides indicating how to clean an article, the care label provides assurance that the article will meet certain standards of colour fastness and dimensional stability, and indicates the effect of retained chlorine and maximum safe ironing temperature. The care labels do not guarantee that an article is durable or meets other performance criteria.

The Canada care label consists of five basic symbols in three basic colours and are registered Canadian trade marks of CCAC. The label material and symbols, as well as the method of attachment used must be sufficiently durable so that the symbols and required information are legible throughout the useful life of the textile.

CCAC verifies any complaints in regard to the program. In addition, labelling surveys and inspections are conducted to monitor that labels are presented in the correct format.

Sampling surveys are also performed to assess the accuracy of the labels by actual laboratory tests. Any errors which are discovered are discussed with the manufacturer/importer/retailer (whose identity is given on the fibre content label) so that he is made aware of the problem and can act to resolve it. Where recalcitrant misuse of the trade marks is detected, civil action may be undertaken under the Trade Marks Act or criminal action under the Criminal Code or the Textile Labelling Act. The major problems which are found concern errors in the colour fastness and dimensional stability as well as errors in shading, order of symbols or permanency of the label.

2.3 Canada Standard Sizing Program

The Canada Standard Sizing (CSS) Program is designed to make available standard body sizes and standard size designations for articles of infant's, children's and women's clothing so that garments providing an acceptable fit can be selected. The consumer benefits because there is assurance of a consistent fit with clothing conforming to Canada Standard Size specifications and buying by phone and mail order is facilitated. In addition, manufacturers and retailers benefit as a result of the reduction in the number of garments returned because of poor fit.

The CSS program is not a mandatory one. Manufacturers need not conform to CSS specifications. However, if dealers wish to apply the CSS national trade mark to garments, they must conform to section 4 of the National Trade Mark Garment Sizing Regulations. The standards which have been developed under the CSS program are specified in the schedule to these regulations.

The CSS program publishes standards of three types:

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- Basic standards which outline the development of the system and provide data in tabular form on body dimensions for standard sizes covering all of the population;
- Modifications to basic standards to make the system conform more closely with the present trade practice; and
- Dimensional standards, which outline specifications for a particular garment for a specific group in the population.

The development of standards is the responsibility of the Committee on the Standardization of Garment Sizes. This Committee researches, writes, and amends both the body standards and dimensional standards for children's, infant's and women's size ranges. It is composed of representatives from Canadian garment manufacturers' associations, retailers, textile testing laboratories, consumer groups and government departments.

The Traded Goods program evaluation component assists in the interpretation of the National Trade Mark Garment Sizing Regulations. It also assists in the registration of complaints about garments which do not apply to the requirements of the National Trade Mark Garment Sizing Regulations. As well, it monitors adherence to the National Trade Mark Garment Sizing Regulations since violators are liable on summary conviction or conviction on indictment to a fine or to imprisonment.

3.0 Component Description

According to the 1982-83 Implementation Plan, the Traded Goods component is described as a sub-activity

responsible, in whole or in part, for the administration of several Federal Acts with supporting regulations. These Acts and regulations mainly concern the consumer's right to information and to honesty and fair dealing. More specifically these Acts and regulations deal with packaging, labeling, quality, quantity, composition and advertising of both food and non-food consumer goods. The component also administers a number of voluntary programs (Canada Standard Sizing and Canada Care Labelling Programs).

There are five main product areas, within which the Traded Goods program component operates. These five product areas are foods, textiles and clothing, precious metals marking and Energuide. The Headquarters staff of the Consumer Products Branch is mainly responsible for policy and program development, program design, monitoring and evaluation. It also provides strategic and functional advice and technical expertise. Although field staff are mainly responsible for the enforcement aspects (to be discussed in the Deceptive Marketing Practices assessment study) of the Acts and regulations developed by the Traded Goods component, they provide from time to time input to policy and program development and trader/consumer information programs.

Objectives

The Traded Goods program component is part of the Consumer Products Branch of the Consumer Affairs Bureau of the Department of Consumer and Corporate Affairs. As stated in the 1983-1984 Operational Plan, the strategic objective of the Consumer Affairs Bureau is:

"To contribute to the integrity and viability of the market economy and to strengthen the

position of the individual consumer in the marketplace by promoting the right to honesty and fair dealing; to safety; to information and to be heard."

The Bureau is responsible for the formulation and implementation of policies and legislation in matters that impact on the consumer interest. It sets and maintains standards for procedures, traders and retailers in the interest of informing and protecting consumers and promoting fair dealing and orderliness in the marketplace.

In order to achieve its objective, the Bureau of Consumer Affairs is divided into five sub-activities, (four operational, one administrative). Each of the four operational ones is responsible for the promotion of the consumer's rights. The main strategic objectives of these four operational sub-activities' are described below:

- Consumer Services Branch: promotes the effectiveness of the consumer in the marketplace and his right to information and to be heard. To this end, the Branch provides information, handles complaints and enquiries, funds consumer groups and represents the consumer interest in policy development by government and business.
- Legal Metrology Branch: administers the Weights and Measures and Electricity and Gas legislation and regulations to promote the consumer's right to honesty and fair dealing. To do so, it ensures accuracy of measurement in marketplace transactions, approves weighing and measuring devices and calibrates weighing and measuring reference standards.

- Product Safety Branch: administers the Hazardous Products Act and regulations to promote the consumer right to safety. Through this Act and regulations the Branch ensures that products meet minimum standards of safety and that consumers are aware of potential health and safety hazards.

- Consumer Products Branch: administers in whole or in part various Acts/regulations to promote consumer effectiveness in the marketplace and the right to information. To this end, it ensures that quality standards are met for certain consumer products/commodities and that consumer choice is facilitated through the appropriate labelling and packaging of products/commodities; also, and it provides information to traders/consumers organizations.

Since the Traded Goods component is part of the Consumer Products Branch's activities, more details on the objectives and operation of this Branch are presented in the following sections.

The Operations Review report of the Consumer Products Sub-activity (1981)* describes its strategic objective as: "to facilitate effective consumer choice". The two sub-objectives of the sub-activity are stated both in the Operations Review report and in the 1983-1984 Operational Plan, as follows:

"To protect against product misrepresentation through detection, control and prevention; and

* Consumer and Corporate Affairs, Operations Review of the Consumer Products Sub-Activity, 1981.

To enhance the ability of the consumer to differentiate among product choices."

These two sub-objectives were retained as the main objectives of the Traded Goods component. However the first one was truncated by removing "detection and control" which would be more appropriate to the statement of one of the objectives for the Deceptive Marketing Practices program evaluation component.

5.0 Organization

As indicated earlier, the Traded Goods program evaluation component is the responsibility of the Consumer Products Branch which is part of the Consumer Affairs Bureau, one of four operational bureaux of the Department of Consumer Affairs. The Consumer Affairs Bureau is organized into five Headquarters' branches - Consumer Services, Product Safety, Consumer Products, Legal Metrology and Management Services and five regional directorates - Pacific, Prairie, Ontario, Quebec and Atlantic.

The present Consumer Products Branch is the successor to the former Consumer Fraud Protection Branch. At the Headquarters level, the Branch is headed by a Branch Director, who reports to the Assistant Deputy Minister, Bureau of Consumer Affairs. The responsibility of the Branch Director, as stated in his job description (dated October 27, 1980), is to ensure that the Consumer Products activity actually operates to provide consumers with adequate protection at a minimum of governmental and industrial cost.

Five division chiefs report to the Branch Director and they are organized according to the following areas:

- retail food
- manufactured food
- merchandise standards
- program co-ordination
- energy program.

The structure has been developed partially along product lines and partially along trade level and legislative lines. A number of product staff specialists support the division chiefs in carrying out their duties.

The operations at the field report to the Assistant Deputy Minister, Consumer Affairs through five Regional Directors. According to his job description (dated June 16, 1980) the Regional Director, ensures that the resources utilized to meet departmental objectives are efficiently and effectively managed.

Within each region, a Regional Manager of Consumer Products reports to the Regional Director. Each regional office has a small support staff and several specialists in one or more of the legislative areas administered by Consumer Products. At the field level or district office, staff consists of District Managers and generalist inspectors, often supported by product specialists.

✓ The involvement of the Consumer Products Branch field staff in the delivery of the Traded Goods component's activities and outputs is minimal and Headquarters staff have functional but no line responsibility over field staff. ✓

Resources

The resources available to the Consumer Products Branch for the fiscal year were as follows in 1982-1983 according to the Implementation Plan:

	<u>PY</u>	<u>O & M</u> (\$000)
Atlantic	28	166
Quebec	64.5	213
Ontario	78	287
Prairies	44.5	238
Pacific	27	138
Headquarters	<u>36</u>	<u>995*</u>
	278	2,037

* Includes \$630,000 Energuide contract funds.

There is no budget for the "Traded Goods" component itself. Since the Traded Goods program evaluation component is mainly the responsibility of Headquarters, the resources attributed to the component in 1982-83 have been roughly estimated at \$995,000 and 36 person-years. This estimate takes into account neither field operations involvement in the Traded Goods component activities nor the Headquarters participation in the Deceptive Marketing Practices component activities through the review of labels and approval of advertising under the Canadian Broadcasting Act.

Activities

The Traded Goods program evaluation component performs several activities in undertaking to enhance the ability of consumers to differentiate between products and to protect against product misrepresentation. These activities are described briefly in the following paragraphs.

Identification of Market Failures

This activity includes the identification and definition of market failures which result in consumer problems

and the analysis of the causes for such market failures. There are several ways by which market failures may be identified, including:

- marketing analysis;
- analysis of laboratory results;
- analysis of compliance rates, dollars at risk;
- participation on consumer/trader committees, standards committees;
- analysis of complaints and enquiries;
- review of existing legislation (regulatory review); and
- study of new developments, industry trends.

The type of market failure we are concerned with, in general terms, is an existing or suspected inadequate provision of market relevant information and/or undesirable marketplace practice relating to the packaging, quantity, labelling, quality, composition and advertising of food and non-food products. The problems to be addressed by the Traded Goods program component are the ones which require policy and/or regulatory action such as development of new regulations or amendment to existing ones.

The Traded Goods staff prioritize the need to resolve identified problems according to a number of factors. The criteria which help determine the relative importance of a particular problem are enumerated below (adapted from In-House Seminar, Food Division, Consumer Fraud Protection Program, 1978):

- the nature of the item associated with the problem;
- the variety and quantity of items which are affected by the particular problem;

- the cost of the item;
- the availability of the item;
- the status of the problem (ie., long-standing, diminishing, or increasing);
- the amount of consumer expenditures on the item;
- the importance of the principle violated;
- the extent of consumer awareness about the problem;
- the ability of consumers to counteract the problem;
- the number and type of consumers requiring protection;
- the knowledge of industry about the problem;
- the ability of industry to resolve the problem;
- the degree to which education is a factor; and
- the amount of resources which can be devoted to resolving the problem.

It is apparent that a careful analysis of the above mentioned factors will result in a hierarchy of problems. Some of these problems will be given more immediate attention because of their seriousness and others may be deferred or not resolved at all because of their minor seriousness.

Consultation Process

In assessing the possible alternatives or options for coping with emerging/identified problem areas, Traded Goods staff do not operate in isolation. The staff consult with industry and consumer groups, and other government departments and agencies in order to discuss the problem, develop options and obtain consensus on an optimal solution.

Consultations with other government departments and agencies are also carried out whenever areas of potential duplication or overlap arise and decisions must be made as to who should best handle a particular problem and/or how to best coordinate efforts.

7.3 Handling Complaints and Enquiries

The Component handles complaints and enquiries received from consumers, industries, other government departments and/or agencies and the media concerning the component's activities, services or legislation. This activity provides a useful tool to the problem identification activity since it identifies problems/trends in the marketplace and hence, the need for new regulations, clarification of policy, change in inspection emphasis, etc. The activity is also beneficial in that it may result in corrective action being taken on a valuable product.

7.4 Development, Revision of Standards/Regulations or Other Mechanisms

Where appropriate, the Traded Goods staff develop or amend standards, regulations, communiqués and guidelines as a mechanism for resolving an identified market failure. In the development or revision of regulations/standards, staff consult with industry, consumer groups and other government departments and/or agencies.

In cases where CCAC does not have responsibility for an Act, but shares in its administration, the Component provides input and advice to the responsible department in regard to new or revised legislation. The responsible department is not mandated to accept the recommendations provided; however the Component may stop, at the Privy Council Office level, any piece of legislation with which it is not in agreement. Further processing of the legislation can only take place when all parties concerned approve the provisions of the legislation.

The Component also participates in the work on national and international (Codex Alimentarius Commission) standards

writing organizations. This allows for the monitoring of existing and emerging problem areas in the marketplace and constitutes a forum for discussing and resolving the same.

In resolving a particular problem, Traded Goods staff consider a number of options and evaluate the impact of each option. This evaluation takes into account the economic, consumer, political, legal and other implications of the option considered to resolve the identified problem. The options may include revisions to existing regulations, development of guidelines, changes in policy, a ban on product, institution of a self-regulating industry committee, etc.

Development of Information/Education Programs

The Branch is responsible for the preparation and delivery of seminars, media interviews, meetings and materials for traders, trade organizations, consumers and consumer organizations. This activity attempts to develop a higher level of consumer and trader awareness and understanding of legislative requirements. These information/education activities are sometimes performed as an alternative to direct inspection for achieving marketplace compliance. They also constitute means to prevent product misrepresentations and enhance consumers' ability to differentiate among product choices. The activities are undertaken both by Headquarters and field staff.

It is generally felt that market failures are more the result of ignorance and careless procedures than deliberate attempts to defraud the public. Therefore, through the provision of information, the cooperation and goodwill of traders may be obtained so that agreement on remedies other

than mandatory standards to correct market failures could be reached. This in turn may result in a general improvement in the marketplace and allow for the resources of the Branch to concentrate on more difficult cases.

Most of the work involved in the enforcement aspect of the relevant statutory requirements and the detection of violations of these requirements stresses the information activity. For example, during an inspection, the inspector informs traders of the provisions of the acts enforced by the Branch and explains the meaning and purposes of the acts in clear terms, defining the trader's responsibilities and showing the trader how to comply. This aspect of the dissemination of consumer/trader information will be treated at length in the evaluation assessment study for the Deceptive Marketing Practices component which will be undertaken in the near future.

7.6 Develop Procedures

The Traded Goods component is responsible for the development/revision/monitoring of a large number of Acts and regulations. Thus, the Consumer Products component, primarily at Headquarters, develops and updates policy and procedures manuals, training modules, technical manuals, interpretations and enforcement policies.

As well, the component develops and distributes guides to manufacturers and advertisers which provide interpretation and applications of existing legislation.

8.0 Logic Model

An important part of an evaluation assessment is the development of a logic model for the program under

consideration. This is a causal model which will constitute the conceptual framework for identifying standard evaluation questions regarding program objectives and logic as well as other concerns for the subsequent evaluation. A logic model identifies program activities, outputs, impacts and/or objectives, as well as causal linkages among them.

The model which has been developed for the Traded Goods program evaluation component has been produced:

- on the basis of a review of documents including, Implementation Plan, Multi-Year Operating Plan and Audit Review; and
- on the basis of interviews with program personnel.

The logic model is shown in Exhibit 1 and page "Annex A-22" and is discussed below.

The first row of the logic model depicts the range of activities performed by the component. These activities were discussed above and in general relate to regulatory and standard development/review and information.

The second row of the model shows the outputs for each of the activities in the row above. For instance, the first activity, "identification of market failures, and analysis of the causes" results in the discovering of problems/issues in the marketplace and a prioritization of these problems with respect to their seriousness. The activity "inform consumers and traders", leads to a variety of information dissemination outputs such as information packages, seminars and booths. All the remaining activities and consequent outputs follow a similar pattern to the two examples cited.

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The third and fourth rows describe the objectives/impacts of the activities and outputs (objectives are distinguished by an asterisk). Five major impacts are apparent, namely:

- protection against product misrepresentations;
- enhanced consumers' ability to differentiate among product choices;
- changed level of competition;
- increased government visibility in the marketplace;
and
- changed costs and prices.

The impacts/effects identified by the objectives of the component are considered as the intended impacts and effects to be expected from the component while the others are unintended ones that could possibly flow from the component's activities and outputs.

ANNEX B

DATA BASE REVIEW

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Data Base Review

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Data base Review

I - Introduction

Identifying and assessing data bases are essential steps in planning program evaluation studies. This report includes an elaboration of the major data bases related to the Traded Goods component found in the Consumer Products Branch of Consumer and Corporate Affairs. As well, some other internal and external sources of information were examined. Because of time and resource constraints, provincial government data bases were not included.

These data bases are quite diverse in their nature. They consist of legal information, consumer complaints, and correspondence to and from a large number of audiences. Some are centrally located in the Records' Management facilities on the 18th Floor of Place du Portage Phase I. These files are generally well-indexed and cross-referenced, and can be easily located. In Consumer Products, MIS systems are being developed which will significantly improve the quality and quantity of effectiveness information in the next few years. Other files are held in the regional and/or district offices; while they are indexed often in the same fashion as Headquarters' files, the contents are often substantially different.

Our methodology for this data base review began with a listing of potential evaluation issues related to the Traded Goods component that could possibly be discussed in the files contained in the Consumer Products Branch. The Branch was then contacted and a process of in-depth interviews and file investigation started. The same process was used in the District and Regional offices as well as other related C.C.A.C. branches and other federal government agencies and departments.

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In Chapter II of this Annex, we will outline in detail the methodology that we used to identify the data bases and will explain the breakdown of their presentation. The third chapter will describe some of the major data bases which were examined. In this section we will point out potential problems which might arise when using these data bases for an evaluation. Our final chapter will consist of Tables of Investigation Results.

II - Methodology

For the purpose of this data base review, the following definition of the Traded Goods component is applied:

"The Traded Goods program evaluation component is mandated to correct market failures by ensuring the provision of adequate, relevant and accurate information to consumers through the development of appropriate standards and/or regulations concerning the composition, quantity, quality, labelling, packaging and other disclosures of information for a wide variety of goods/commodities being traded in the marketplace. These products/commodities include food, textiles, precious metals, other non-food products, and, through the Energuide program, major household appliances."

At the initiation of this review, a listing was made of the potential evaluation issues, related to the Traded Goods component that could possibly be addressed through files or data bases contained in the Consumer Products Branch. Letters outlining these issues were sent to senior officers of the Branch; they then helped arrange meetings with those staff members who would be best prepared to discuss the data bases. Forms were designed which outlined the basic

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required information. This information included: data base titles, location, format, type of information found in the data bases, other comments (relevant to the data base), and a section to relate a particular data base to one or more applicable evaluation issues. One of these forms has been filled out per data base reviewed.

We then proceeded with interviews of branch staff. From these, more in-depth descriptions of the data bases were obtained and it was also possible to ascertain how the data bases are used in the work areas. The files were then investigated in terms of content and organization. When necessary, more detailed information was obtained on the more complicated file systems.

Information flow was studied between related branches (such as Legal Services, Communications and Consumer Services), and their relevant files were reviewed. Regional and District offices of the Consumer Products Branch were visited and new files were investigated. Files that interrelate with Headquarters' data bases were also reviewed and similarities or differences have been noted where significant. Contacts were made with other government agencies and departments who work in conjunction with the consumer Products Branch examined in this report.

III - Main Data Bases

The following are more detailed descriptions of some of the data bases or systems that were found in the investigation. Their structure is explained in more detail and parallels or differences either in form or content between Headquarters, Regional or District offices are stressed.

3.1 HEADQUARTERS' DIVISION FILES

These files, relating to Consumer Products Branch, resemble in organization (subject indexing and unique numbering) the specialist files held in the Regional offices. Some of the file blocks use different titles, and thus the "Retail Food Division Files" correspond to the Regional "Agricultural Products Files", "Merchandise Standards Division Files" parallel the "Precious Metals Marketing Files", with some tie to the "Textile Files", and the "Manufactured Food Division Files" are closest to the "Food Files" found in the Regions. There is also a "Textile Labelling" file set and a "Packaging and Labelling" file set held at Headquarters, and the same titles are used regionally. There is a file block relating to the "Energuide" program, which is unique to the Headquarters operation and will be discussed separately.

The files kept at Headquarters will be found in Records' Management on the 18th Floor of Phase I, Place du Portage. In most cases, there is a manual describing the subject and numbering systems. The only exception is the "Retail Food Division" Files. These files are cross-indexed via a linedex, but this does reflect Records' Management numbering and subject systems. The "Manufactured Food Division Files" and the "Textile Labelling Files" have enriched access, since there is not only the Records' Management Manual descriptions but linedex cross-referencing as well.

The Headquarter's Consumer Products Files differ from those of the Regions, reflecting the role of the Headquarter's office. These files tend to be mainly correspondence and reflect a policy/directional role rather than the Regional and Districts Complaint handling/enforcement/prosecution roles. The files contain a large

amount of correspondence regarding regulations and their interpretation, Branch policy, and directives and instructions to regional or District staff. Technical information will also be found in these file blocks, as will some limited market surveys. All file blocks in each subject grouping contain information on cooperation and liaison with associations, foundations, and other government departments - both federal and provincial. Actual "Complaints and Inquiries" may be found in these files, but only in cases where Regional specialists have felt the need to seek back-up advice from Headquarter's personnel. Thus, Headquarter's product files would not be sufficient on their own when studying a particular product.

A brief description of the file groupings follow:

3.1.1 Merchandise Standards Division Files

This file set encompasses "Precious Metal Marking" and "Textile Trade Marks". There is information on "Fur-Garment Marking". The files are broadly broken down, as follows:

- Merchandise Standard Division - General.
- Fur - Garment Marking - General.
- Fur - Cooperation and Liaison.
- Fur - Surveillance and Enforcement - General. These contain general policy information and directives to Regional and District Staff.
- Fur - Surveillance and Enforcement - Companies. This grouping includes inquiries, interpretations, warnings etc. They are kept in alphabetical order

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by the name of the companies, but they are not as reliable as the district "Establishment files".

- Precious Metals Marking - General.
- Precious Metals Marking - Cooperation and Liaison.
- Precious Metals Marking - Surveillance and Enforcement - General. These files are parallel in content to the "Fur - Surveillance and Enforcement - General".
- Precious Metals Marking - Surveillance and Enforcement - Companies. The same situation exists in these files as for "Fur - Surveillance and Enforcement - Companies".
- Precious Metal Marking - Foreign Government marks. This block contains files on hallmarks and quality marks used internationally.
- Precious Metals Marking - National Mark.
- Precious Metals Marking - Trade marks.

3.1.2 Retail Food Division Files

These are the files which have no Records Management manual available at Headquarters. They tend to contain the same type of classifications as the Merchandise Standards files. There are some files indexed under "Enforcement Program" relating to prosecutions, but it would be better to research this type of information at a Regional level to ensure completeness. A "Commodity" file set exists with this grouping, but this has only resulted from specific studies and is not really that closely aligned to the

Regional food product files. These particular Headquarter's files contain very good information on Federal and Provincial Legislation as well as on Federal-Provincial agreements in the area of inspection.

3.1.3 Packaging and Labelling Division Files

This set has been broken down into nine broad categories and then sub-divided more specifically within these categories when warranted. The broad categories are:

- General
- Canadian Standards Board Committee
- Meetings
- Cooperation and Liaison
- Enforcement Program
- Labelling
- Packaging
- Quality Assurance
- Surveillance program
- Products.

The unique set entitled "Canadian Standards Board Committee meetings" holds correspondence, meeting notes and standards. There are specific sub-sets covering the "Shop Canada" and "Made in Canada" programs, furniture polish and nutritional testing for pet food. The "Labelling" and "Packaging" files have general correspondence as well as reports of projects relating to these areas, i.e., the Bilingualism Labelling Program or specific product packaging studies, e.g., on mustard or ketchup. Again, for the Surveillance and Enforcement issue, there is coverage in these files, but it would be better to study them at the Regional level.

3.1.4 Textile Labelling Files

This file grouping is broken into twelve broad categories, which parallel the other file sets already discussed. There are, however, specialized files such as the block entitled "Canada Standard Size Program" which includes policy information, complaints and inquiry correspondence, garment sizes and the regulations and amendments to the National Trade Mark Act. The "Care Labelling Program" files contains general information as well as complaints and inquiries relating to the program and rulings under the program. Files relating to care labelling symbols and dry cleaning and laundering are also maintained.

3.1.5 Manufactured Food Division Files

Eleven broad categories, broken down more specifically within the categories, are used for this file set. These files again reflect the other Headquarter's files already discussed for their organization and content. A unique grouping is the file block entitled "Advertising", which covers advertising of food products by Associations or other groups and advertising of specific products, i.e., "Advertising-General-Beef-Carcass by Grade." There are further specific food product files contained in the Labelling and Packaging blocks.

3.1.6 Energuide Files

These files are kept in the Headquarter's office of the Program Director of the Consumer Products' Branch on the 16th floor of Phase I, Place du Portage. They are opened, labelled and indexed by Records' Management on the 18th floor of Place du Portage Phase I and a Records' Management manual is available there describing the unique subject and numbering system used. The Energuide program has no

district or regional staff working on it, so there are no corresponding files at this level. Inspections for this program are done by employees of the Canadian Standards' Association (CSA) and not by the Department. The files reflect heavily the special relationship with CSA and they contain standards, ballots, correspondence and committee meeting minutes. There are thirteen broad subject headings, which are:

- Energy efficiency program (general)
- Contracts/regulations
- Standards/ballots
- Technical subcommittees (meetings/agenda of meetings)
- Cooperation and liaison
- Steering committee on performance of electrical products
- TEC PEC (meeting)
- Project status reports
- Energuide directory and press releases
- Administration/policy/rulings/enforcement
- Marketing and Advertising program
- Branch administration

3.1.7 Regulatory Review Binders

These binders, maintained in the office of the Director of the Consumer Products Branch at Headquarters in Hull, represent a complete data base related to this branch's participation in the initial steps of regulatory review. Based on Treasury Board directives, the Department of Consumer and Corporate Affairs has done a review of all of its existing regulations. The Consumer Products Branch's six looseleaf volumes are:

- (1) Food and Drug Act Regulations
- (2) National Trade Mark and True Labelling Regulations

- (3) Textile Labelling and Advertising Regulations
- (4) Consumer Products and Labelling Regulations
- (5) Consumer Packaging and Labelling Regulations
- (6) Canada Agricultural Products Standards Regulations.

These looseleaf volumes represent the analysis done by the Headquarter's specialists who have incorporated commentary from field officers. The first page outlines the basic results of the review. For example, in the Food and Drug volume, this page indicates that 485 sections related to CCA activities were studied and that 281 should be retained, 118 require housekeeping changes, 114 should have further substantive study, 1 should be completely amended and 1 should be repealed. The volume for National Trade Mark and True Labelling Regulations indicates an even greater need for change. The next pages cross-tabulate products or commodities to regulations and the more complete discussion within the text. The final segment is the narrative which outlines the reasons for the recommendations. These recommendations for change could be based on the issue of necessity, enforcement, redundancy or relevance to today's consumer. Changes to the regulations to the Food and Drug Act must be agreed upon by the Ministers of Health and Welfare and Consumer and Corporate Affairs. The others are the responsibility of the Minister of Consumer and Corporate Affairs. The exception is the review entitled "Canada Agricultural Products Standards Regulations". CCA has only delegated authority at the retail level and Agriculture Canada has the ultimate responsibility. Thus, this segment of the review is more politically sensitive and the Consumer Products Branch does not expect many of their recommendations to be acted upon.

At the moment, the Branch is involved in the beginning of Phase II of this review which is the process of consultation. The "Preparation of Regulatory Agenda" for publication in the Canada Gazette Part I is completed, as is the writing of communiqués to be sent to concerned parties that the Department is aware would be interested. As this phase continues, the Director of Consumer Products Branch would be an excellent source of information.

3.2 DISTRICT OFFICES' ESTABLISHMENT FILES

These files will likely be of greater use for the Deceptive Marketing Practices study than for the Traded Goods study. The basic files or data base found in a District Office of Consumer Products Branch are the "Establishment Files". The basis of these files are CCA form 1566 (2-82). An "establishment file" will be opened one of two ways - either complaint has been received, or a district office will become aware of an establishment that has never been rated. These ratings are assigned by inspectors on their visits. The ratings are based first on size. This is done objectively by the inspectors, but the rule of thumb is: two or less cash registers is a small store; two to four cash registers is a medium store; and four or more cash registers denotes a large store. The inspector then rates the establishment in relation to "violations". The first type of violation is "fraudulent". A store that receives a good rating has no violations, less than 5% is average while more than 5% is poor. An example of fraudulence in the area of textiles, for example, would be incorrect labelling of fibre content. The percentage would be estimated in relation to lot size. The other type of violation is entitled "technical". This would occur in an area such as a labelling infraction, where textile contents may not be listed in proper order. In this type of violation, the rating is "good" for 15% or less violations,

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"average" for 15% to 30% violations, and "poor" for over 30% violation. These ratings dictate when the next inspection will take place. An establishment that is listed as "poor" will be revisited within a month, "average" will mean six months, while "good" will indicate a visit within nine to twelve months. A card system that cross-references the establishment files is used in the District offices as a "BF" or "bring forward" system, so that establishment will be revisited at the correct time.

The rest of form CCA #1566 (2-82) relates to the products viewed in the establishment. This form comes in several parts. The pink copy is sent to the appropriate Regional specialists (i.e., food, agricultural, precious metals, etc.). The green copy goes to Sharon Watts in Headquarters and is used for performance indicators, compliance ratios and as part of the "dollars at risk" formulations. For Ms. Watt's information, the verso of the green copy must also be filled out. One copy is kept by the inspector and another copy is kept in the District's central establishment files.

The "establishment files" contain, as well, other valuable information. In the case when a seizure is made and there is a release, copies of CCA form #737 (3-79) "Notice of Seizure and Detention" and the "Notice of Release", CCA form #738 (8-80), are placed in these files. These forms are kept separate with the inspector until a release is given or prosecution goes ahead. Copies of any regional specialist's reports are also kept in these files. Copies of prosecution information is kept in the "establishment files".

For Consumer Products Branch, the District Office is generally the only source of "establishment" information. One exception is the Atlantic Regional office, which also

maintains establishment files. One set is based on manufacturers, wholesalers, and importers. They also keep establishment files on large retail outlets, but this is not as complete.

3.3 REGIONAL OFFICES' SPECIALIST FILES

These regional Consumer Products' files are split into the five specialist areas: food, agricultural and fish products, textiles, precious metals, and packaging and labelling. For these files, the numbering and subject breakdowns are the same as those used in Records' Management at Headquarters in Ottawa. The file names at Headquarters are, however, somewhat different, and fall into the following categories: retail food, manufactured food, merchandise standards, textile labelling, packaging and labelling. There is some "establishment" information in the Regional offices, but it repeats what is found in the Districts and is not as complete.

The basic difference between Headquarters and Regional files is not the breakdowns, but content. The Headquarters files represent the direction of the department on a national basis in the area of policy, procedures and back-up. The Regional files indicate the stronger role of complaint handling, enforcement and prosecutions. The main difference between the Regional and District files is the product orientation of regional files as opposed to the establishment orientation of the District files.

The following are brief descriptions of the Regional Specialist data bases. They are indexed via a Records' Management manual in all Regions, but to use them effectively, it is probably best to work with the Specialist. There is a great amount of activity in the Regional Offices, so current material may not be incorporated into these files as quickly as one might like.

3.3.1 Food Files

3.3.1.1 - Complaint Block.

Although complaints are really a District concern, complaint files exist here. There are two types of complaints - by consumers and by competitors. Complaint form CCA - 1059 (11-79) is used to record telephone complaints. A large number of competitors' complaints are received by mail. Included in these files is a copy of the complaint, correspondence to and from the concerned parties, memoranda concerning action taken, and sometimes a copy of the pink CCA form #1566 (2-82) Establishment Report. These files are kept chronologically.

3.3.1.2 - Limited Market Surveys.

These files are arranged product by product and chronologically. The complete survey reports are kept here.

3.3.1.3 - Specific Product Files.

In the food data base, these files are very detailed and very complete. Examples of breakdowns are as follows:

- animal products - general

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- animal products - frozen
- animal products - kosher
- beer, light
- baked goods
- baked goods - dessert.

Within each of these files, there are detailed specialists' reports based on inspector's form 1566 (2-82), correspondence and any reports of prosecution progress. Sample information would also be found here.

3.3.1.4 - Advertising Files.

These files are created when the department sees a problem concerning the Acts for which they are responsible, when a complaint is received, or when an advertiser contacts the office in the area of compliance. The content of this block of files, which are arranged chronologically, includes advertising copy, text of television or radio ads, correspondence to and from concerned parties, and some detailed annexes relating to the acts and regulations.

These files relate to some extent to Headquarters' Manufactured Food files.

The Pacific Region keeps a separate file by company name for food label reviews. This is maintained alphabetically by company name.

3.3.2 Textile Files

These files are also organized like Headquarters' Records' Management, and their breakdown and content are

very similar to the Regional Food files. Some files of note are:

- 3.3.2.1 - Communication Block. These files contain detailed media contact information based on interviews given by specialists or inspectors in the Region. These files relate to the mandate of educating the public. The breakdown is chronological.
- 3.3.3.2 - Care Labelling Files cover infractions to Care labelling regulations as well as Departmental regulations and policy.
- 3.3.3.3 - District Files (broken down by all District offices in the Region). As the textile specific products are not as complete as for food, the specialist's reports and sample information is found in these files. It would be here that the pink copy of 1566 (2-82) would be found, as well as Specialist's reports, etc. These files relate to some degree to Headquarters's Textile labelling files and, to a lesser degree, the Merchandise Standards files.

3.3.3 Precious Metals Markings Files

These files are kept in a style similar to the Records' Management system in Headquarters. They are the same as food and textiles, with the exception that the prosecution files in Montreal are more detailed. These files bear closest resemblance to Headquarter's Merchandise Standards Files. In the Pacific Region, the Precious Metals specialist keeps files in his block of all establishments in his regions.

3.3.4 Agricultural Products Files

Like the other Regional files, these are kept in a similar fashion to Records' Management at Headquarters, reflecting the same numbering and subject sequence. Unlike the Regional food files, the product refinements are not especially detailed.

3.3.5 Packaging and Labelling Files

These are similar to the other Regional files and emulate the subject and numbering system of Headquarter's Records Management. These are not very product-specific, since the number of consumer products covered by these specialists is very large. These files relate, to some degree, to the Packaging and Labelling files maintained at Headquarters. In Montreal, the system is unique to the specialist of the moment due to staff and space constraints.

3.3.6 Regional Prosecution Files

In all regions the Prosecution files are kept differently. In the Quebec region, these files are kept in separate blocks within the specialists files. The Prairies, Ontario and Pacific regions keep prosecutions separate from the product/specialist files while the Atlantic Region has them within their "Housekeeping files" and its organization is explained in the section on "Housekeeping files". In the Ontario and Pacific Regional offices, these files are cross-referenced by a number which denotes the year, i.e., 83, and the sequential time the file is received, i.e., 83-001, 83-002, etc. For the Prairie region there is no card index but prosecutions are organized by the act involved, such as the "Food and Drug Act" and within each act grouping alphabetically and chronologically. Prosecution files contain copies of the relevant CCA form

#1566 (2-82), CCA form #894 (-9/76) Report of Prosecution, the inspector/specialists' recommendation of prosecution and all other related correspondence and memorandum including to and from the Department of Justice.

3.4 MIS SYSTEMS

In Consumer Products, MIS systems are in place that give extensive information on effectiveness indicators.

For Consumer Products Branch, the basis for monitoring activities is CCA form #1566, which is sent to the Headquarter's Planning and System Analysis Group. It is the green section, filled out on both sides, which is the basis for the "Consumer products - Non-compliance ratios" report. The success of the Branch's activities can be evaluated through improved or declining compliance. This is presently input to an outside computer service bureau data base that produces batch monthly reports.

The information on non-compliance ratios feeds into the annual "dollars at risk" analysis, which allow for the setting of Branch priorities. The "dollars at risk" formula is:

dollar consumption	x	% of non-compliance	x	product
(from Statistics				problem
Canada Surveys)				seriousness
				factor

The "product problem seriousness factor" was ascertained through a 1982 consumer survey done by the Branch. The result of this is an annual list of product class priorities from 1 to 36.

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This MIS system will change by 1984. Form CCA #1566 will be revised so that "product compliance ratios" will be based on products tested, as opposed to lot size; this will result in a more reliable estimate of non-compliance ratios.

"Establishment compliance" information, which presently cannot be accessed except manually at the District level, will be included in the new national system. Subjective size ratings assigned by inspectors will be redefined to more objective square footage. It will be possible to relate this information to product information to assist Regional managers to prioritize and direct Inspectors' work. The new system will be online and directly accessible in the Regions for both input and retrieval.

Time utilization for Headquarters' Consumer Products Branch activities is done within the Headquarters' Branch itself. It results in a quarterly report sent to the Assistant Deputy Minister, Consumer Affairs, and is based on the unique activities of the HQ's branch in the areas of functional guidance, policy development, etc. It compares actual time against forecasts made in the HQ's implementation plan. Regional and District activities, in terms of utilization, are also reported to the Assistant Deputy Minister, Consumer Affairs, but they are generated by Management Services Branch, Planning and Control Division. Based on a quarterly roll-up done by the Regional manager on the district and regional time reporting, Management services produces a computer report that compares actual time on activities to the forecasts made in the annual implementation plan. This report gives regional figures and comparisons based on forecasts and actual time, as well as percentage variances for each work element of the implementation plan. The time utilization reports sent by the Regions are also accompanied by a narrative report that is supposed to explain any of the variances that have

occured. The quarterly computer print-outs are sent to the Regional managers and directors and the Director of Headquarter's Consumer Products Branch. Management Services uses the printout and the narratives as the basis of their report to the ADM, Consumer Affairs, on the activities of the Regional and District Offices of the Consumer Products Branch.

3.5 HOUSEKEEPING FILES

The Consumer Products Branch maintains "housekeeping files" which relate to general branch, regional or departmental policy and actions. They also contain standard federal government files in the areas of finance, administration and personnel.

The "housekeeping files" of Consumer Products Branch are kept and maintained in Records' Management on the 18th floor of Phase I, Place du Portage. They can be accessed through a unique subject and numbering system. There is also linedex access via an alphabetical subject breakdown which cross references the more detailed subject sub-sets. There is linedex access via file numbers which is more complete than the general numbers found in the Records' manual. The same system is found in the Regions and Districts but the linedex access does not exist.

Beyond the normal public service type files, the Housekeeping files reflect Branch activities, policy and directives of a more general nature. At Headquarters, for example, files on Access to Information and its possible effects on the Branch exist. Letters from associations would be found here if they relate to "national" issues. Memoranda on judgments are included when a judgment could effect a change of attitude on the part of the legal system

across the country. There are extensive files on acts and regulations including commentary on possible regulatory review.

The regional and District files have the same type of content, and they contain a large number of memos, letters and directives that reflect regional or district interaction with Headquarters in terms of such things as policy. In the Atlantic region, there is also included the "Prosecutions" files within the Housekeeping files, under "Consumer Products Branch - General - Prosecutions". They are uniquely numbered within the housekeeping files and there is a card system to cross-reference only this segment, which is detailed by file number, name of establishment, and the problem or charge. In the Regions and Districts, these "housekeeping files" are kept close to the Regional manager or District manager and they would be the persons to consult when using these files.

3.6 SOURCES OF INFORMATION IN OTHER CCA BRANCHES

Other Branches within Consumer and Corporate Affairs maintain files that could relate to the traded goods activities of the Department.

- 3.6.1 Consumer Services Branch is a central mode for departmental complaint handling and referral. To assist their officers (Headquarters, Regional and District), they have a basic referral manual. The basic manual was set-up at Headquarters, and each Regional and District office can enrich its own version. These manuals are made available to the staff of other Branches in Regional and District offices to help them in any referral activities. This manual cross-references typical product complaints or other types of complaints received by the Department to the appropriate

CCA Branch, other federal or provincial departments or agencies, or the most relevant consumer association.

3.6.2 Communications Branch is responsible for all the communication activities of the department. They have specially assigned officers responsible for the Consumer Products Branch who plan their activities in coordination with the specific Branch directors. Each of these officers prepare an annual communication plan (with their Branch liaison) which outlines projects for the coming fiscal year; these might include development of pamphlets, advertising or audio-visual aids.

Communications Branch maintains materials for distribution, news clippings, etc. for a three to four-year period. As the specific Communication officers maintain a close relationship to their branches, they are a "data base" on their own. They can even locate material older than three or four years. Because of the nature of the specific branches in question, there is some duplication as to what is retained in Communication's Branch and in the Headquarters' Branch files.

There is no regional communication liaison at the moment, and the activities of this Branch is really oriented toward Headquarters. The Communication Branch is now in the process of hiring their own regional officers.

3.6.3 The Legal Services Branch at Consumer and Corporate Affairs is staffed by lawyers from Department of Justice who offer advice to the Headquarter's staff. The majority of Headquarter's legal opinions are most frequently requested previous to the prosecution stage of a case. In some cases, these opinions are given orally, based on a meeting between a legal services officer and a Branch officer. These oral opinions are not written up at all.

When a written request for a legal opinion is received, then a written reply is given. The original copy is sent to the requesting officer and should be incorporated into his/her files. Legal services also maintain their own files. The file system is the same as the one used by Records' Management at Department of Justice. Each file is given a unique sequential number. Access points are: the act involved (e.g., Food and Drug Act), the related section, random subject (no thesaurus is used), and the name of the person, company or the case involved. If another department is mentioned, that will also be indexed, e.g., Department of Agriculture. A card system is used to cross-reference these files. The Legal Services files can be highly sensitive, so consulting them would have to be cleared through CCA's Legal Services staff.

For Consumer Products Branch, the prosecution work is done at the Regional level. Thus, the majority of legal opinions would go directly to Department of Justice Regional Offices. These Justice Regional offices do the actual litigation work for the Branch. Should a litigation be undertaken in an area where there are no Justice lawyers, Department of Justice will hire the outside law firm. There will be CCA files maintained in these Regional Justice offices as well. From time to time, Regional Justice officers might request advisory counsel from Headquarter's (CCA) Legal Services and written opinions may be given. The original would be sent to the Regional Justice Office and a copy would be kept and indexed in the Legal Services Office at CCA Headquarters. No copy would be sent to the CCA Branch.

Legal Services does become involved in Regulatory Review, but they initiate nothing themselves. Departmental Branches will ask for advice and legal drafting of the regulations is done by the Legal Services staff.

IV - TABLES PRESENTING INVESTIGATION RESULTS

In the following pages Investigation Results are presented in Tables. These are the data base listings themselves and are broken down in three sections:

- Section 1 - Books
- Section 2 - Reports
- Section 3 - Files, systems, etc.

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Section 1 - Books

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
An Assessment of Consumer Products Branch Priorities, Craig Campbell, 1981.	Program and Evaluation Branch (H.F. Boulton)	hard copy	Report of the Consumer Research and Evaluation Branch of CCA. Assesses the procedure utilized in setting Consumer Products Branch priorities.	Comprehensive Executive Summary available. - Comments on the study were made by the Director of the Consumer Products Branch and Acting Director of Consumer Products Branch (file G7023-9, dated May 13, 1981 and July 8, 1981.)	- Product Class Priorities

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Energuide Directory, 1982. Consumer Products Branch.	Consumer Products Branch/Communication Services Branch, CCA	hard copy	<ul style="list-style-type: none"> - Directory contains current appliance models and energy consumption figures for each of the appliance models - Such information is available for refrigerators, freezers, ranges, clothes washers, clothes dryers and dishwashers. 		- Communication/ Information

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WH EVALUATION ISSUE
Consumer Products Branch. A Policy Manual in packaging and labelling specialists of the Department of Consumer and Corporate Affairs acting under the Consumer Packaging and Labelling Act and Regulations.	o Consumer Products Branch, 16th Floor o Regional & District Offices	looseleaf binder	This manual is issued for field officers. It is broken down as follows: 1) Duties, Powers & Responsibilities of Inspectors 2) Seizure - i.e., Authority; definition; Philosophy; Procedure; forms; How to use forms 3) Method of disposal of seizures with detailed information 4) Procedure for the Disposal with detailed breakdown 5) Court prosecutions with the following details: Offences; Notes on evidence; Advertising; Sale; Notes of a visit; Prosecution narrative.	- This manual is not up to date as it was done in December, 1975. It is being considered for revision. - Format not as good as other more recent manuals such as "Precise metals marking policy and procedure manual".	- Rationale - Inspection process - Investigation - Relationship to the legal system - Prosecution - Compliance - Effectiveness issue

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Information Bulletins. Consumer Products Branch.	Consumer Products Branch, CCA	hard copy	Informational Booklets describing the programs/activities of the Consumer Products Branch; for example: - Guidelines to the Canada Standard Size Program - Guidelines to the Canadian Care Labelling Program		- Communication/Information

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Inspection Procedure Manual - Retail Food. Consumer Products Branch.	<ul style="list-style-type: none"> o Consumers Products Branch, 16th Floor o Regional and District Offices 	looseleaf binder	<p>This manual is issued for the guidance of field officers. It is broken down as follows:</p> <ol style="list-style-type: none"> 1) General program orientation including objectives, inspection (general), equipment, enforcement, training. 2) Specific breakdowns by product i.e., Eggs by regulations, inspection procedures, dealing with violations, training pamphlets. Other products: poultry, dairy, Fresh fruit and vegetables, Processed fruit and vegetables, honey, maple products, fish and marine products. 	<ul style="list-style-type: none"> - Up to date as of March, 1982 - very clear includes term definitions, charts, tables, examples. - detailed i.e., Fresh fruit & vegetables has breakdowns like apples, field tomatoes, rutabagas. - available in French 	<ul style="list-style-type: none"> - Rationale - Inspection process - Investigation - Prosecution - Compliance - Effectiveness issue

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Net quantity determination manual. Consumer Products Branch.	Consumer Products Branch, 16th Floor.	Hardcopy Looseleaf	<p>For use of field personnel where the question of net quantity determination is part of act, regulations.</p> <p>Breakdown:</p> <ol style="list-style-type: none"> 1. Introduction (very brief). 2. Equipment requirements (required; equipment list; equipment for district laboratories. 3. Equipment utilization - detailed information i.e., "15 ts. equal arm scale"; "Platform scale", "Strathmos Scale", "Relative Density cup", etc. 4. Factors affecting scales - this includes "Excessive friction" "Needle problems"; "Dash - pot operation"; "Cleanliness and Maintenance". 	<ul style="list-style-type: none"> - No date of publication given. Timeliness is questionable on that basis. - Information on equipment very detailed. 	- Inspection process

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Office Consolidation Canada Agricultural Products Standards Act and Regulations. Consumer and Corporate Affairs Canada.	o Consumer Products Branch o District and Regional Offices	looseleaf binder	<ul style="list-style-type: none"> - Breakdown of: <ul style="list-style-type: none"> . Canada Agricultural Standards Act . Fresh fruit and vegetable regulations . Processed fruit and vegetable regulations . Processed poultry regulations . Veal carcass grading regulations. 	<ul style="list-style-type: none"> - clear, concise - up to date (updated by department/dependent on district/officer to keep up to date) - easy to use 	<ul style="list-style-type: none"> - Rationale - Inspection

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Pamphlets. Communications Branch.	Distribution Centre, Phase II 4th Floor, contact A. D'Aoust. (Communication Branch)	hard copy, various sizes	Information pamphlets concerning various topics. Titles include: <ul style="list-style-type: none"> - Precious Metals, Buyer Beware! - Down Spelle Lightweight Warmth and Comfort - Follow the Signs - Every Label Tells a Story - Look for the Label - Labels Tell the story - Follow the Signs - Before You Check Out, Check Our List - It Pays to Advertise (honestly!) - A Brief Guide to Questionable Advertising and Marketing Practices 	<ul style="list-style-type: none"> - Relates to the information activities of the Traded Goods and Deceptive Marketing Practices program - A new publication is forthcoming, entitled "How to Avoid Misleading Advertising Guidelines". It will be for sale in the spring. - There is a stock room inventory listing of publications. The listing of publications has a sequential number, title and indicates the quantity of each publication held in the Publication Centre of the Communications Branch. 	<ul style="list-style-type: none"> - Information/Communication

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Precious metals Marking policy and procedure manual. Consumer Products Branch.	o Consumer Products Branch, 16th Floor o Regional and District offices	looseleaf binder	This manual is issued for the field officers. It is broken down as follows: 1) History of Precious Metals Marketing Act 2) Aims and objectives 3) Metals subject to Act & regulations 4) Manufacturing processes 5) Precious metals marking act; incl. regulations 6) Precious metals marking regulations 7) Trade marks required by the precious metal marking act 8) Inspection - Procedures 9) Inspection - Reporting, Sampling & enforcement 10) Testing and analysis of precious metals 11) Precious metals marking glossary.	- Up to date as of December, 1980 - clear, concise with definitions, etc. - detailed to specific metals i.e., gold or products i.e., flatware - available in French.	- Rationale - Inspection process - Investigation - Prosecution - Compliance - Effectiveness issue

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Textile training and reference manual. Consumer Products Branch.	o Consumer Products Branch, 16th Floor o Regional & District Offices	looseleaf binder, 2 volumes	<p>This manual is issued for the field officers. It is broken into 2 modules and then parts within the module. Module I - Consumer Products Inspector; Retail Textile Inspector</p> <ul style="list-style-type: none"> o Part I - Aims, objectives etc. of program o Part II - The Canadian Textile Market o Part III - Introduction to Textiles o Part IV - The Textile Labelling Act & Labelling and advertising Reg. o Part V - Consumer Textile Articles, inspection, examination, reporting procedures and sampling techniques. o Part VI - The Care labelling, inspection, examination and reporting procedures. o Part VII - The National Trade Mark Sizing Regulations (Canada Standard Sizing Regulations), Inspection, Examination and reporting procedures. <p>Module II - Consumer Product Inspector - Senior (relates to: Officer-in-charge; assistant district; Inspector; District Inspector; Regional Specialist)</p> <ul style="list-style-type: none"> o Part VIII - Survey of laboratory testing and reporting o Part IX - Import practices, Import documentation, customs procedures, admin & enforcement to regulations o Appendix A - The National Textile Policy in Canada o Appendix B - Canadian Textile Market Statistics o Appendix C - One Regional Textile specialist's approach to inspection and enforcement. 	<ul style="list-style-type: none"> - Dated December 1975, not as up to date as it should be but is being considered for revision. - clear, concise, detailed. 	<ul style="list-style-type: none"> - Rationale - Inspection process - Investigation - Prosecution - Compliance - Effectiveness issue

Chapter IV

Appendix B

Traded Goods

Section 2 - Reports

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Canada Consumer and Corporate Affairs. Annual report Consumer and Corporate Affairs.	Communications Branch, CCA	Hard copy Booklet	<ul style="list-style-type: none"> - Listing of senior departmental officers - Descriptions of the mandate of the Bureau & offices of CCA and a brief narrative of their activities during a year - Statistical breakdowns of various departmental activities - Description of departmental services and management information <ul style="list-style-type: none"> • e.g., Departmental appropriations and expenditures. 	Published annually after the end of the government fiscal year	<ul style="list-style-type: none"> - Information/Communication (ver general informatio most issues) - Effectiveness issue

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Consumer Concerns in the 80's. Consumer Research and Evaluation Branch. Bureau of Consumer Affairs	File 5800-4, 81-08-27	hard copy	The document describes the socio-economic factors which will impact on consumers' concerns in the 1980's. It prioritizes these concerns and focuses on how these concerns (problems) will affect the activities of the Consumer Affairs Bureau (i.e., Consumer informational requirements, consumer advocacy).		- Rationale

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Measurement of the relative importance of violation seriousness across product classes: "Weight factors". (Sept. 1982) Demand Research Consultants Inc.	Consumer Products Branch Planning and System analysis 16th Floor	Hardcopy Report	<p>Consultants report broken down as follows:</p> <p>I. Introduction, background etc.</p> <p>II. Conceptual report.</p> <p>III. Perceived frequency of violation occurrence.</p> <p>IV. Perceived violation seriousness.</p> <p>V. Conclusions.</p> <p>VI. Appendices.</p> <p>The information is used in the formulation of "dollars at risk" and the establishment of the "Product class priority" to be used at HQ's, and in the Regions.</p>	<ul style="list-style-type: none"> - Previous to this report, "dollars at risk" formulation was more subjective. This survey was the first done. - The Branch hopes within the next 2-3 years to do a more in-depth survey and from that to establish the frequency with which they will be needed for the future. 	<ul style="list-style-type: none"> - Product class priorities - Compliance - HQ's/field relationship - Consumer behaviour - Effectiveness issue

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Quarterly report of Branch operations. Consumer Products Branch.	Consumer Products Branch - HQ's. Office of Regional Managers. Office of Division Chiefs. Office of the A.D. M-Bureau of Consumer Affairs.	Hardcopy Report-Quarterly	<ul style="list-style-type: none"> o Split of HQ's activities and field operations. o Based on brief project reports. o Time reports on activities with % of resources available (i.e., person years). 	This report contains a "mixed bag" of information. Some time reporting etc. is involved as well as a report on a myriad of projects including "Regulatory review", "Inspection activities" or "Legislative and Regulating Activities".	<ul style="list-style-type: none"> - Inspection - Regulatory Development - Regulatory review - Headquarters/Field Relationship

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Survey of Atlantic Region Media	Communication Services, personal file of officer Downing	report (very draft)	<p>Survey^a conducted in Atlantic Region specifying:</p> <ul style="list-style-type: none"> - extent of awareness - knowledge about CCAC Legislation - CCAC Services - impression of CCAC - consumer concerns of today <p>^a Survey conducted with media representatives in the maritime provinces. It was prepared by a Summer Student.</p>	- in preliminary stage, not formal document	- Communication/ Information

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Year-End Report. Consumer Products Branch.	Consumer Products Branch, CCA File No. 7019-4	hard copy	Activity report of the operations of the Consumer Products Branch. Includes: <ul style="list-style-type: none"> - narrative report on the various Branch activities - quantitative report on the person-year and resource utilization for activities of the Branch (planned, actual and variance) 	- compilation of Quarterly Reports	<ul style="list-style-type: none"> - Regulatory Development - Regulatory Review - Effectiveness Issue

Chapter IV

Appendix B

Traded Goods

Section 3 - Files, Systems Etc.

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Agricultural Products Files. Consumer Products Branch.	CCA Consumer Products' Branch. Regional Offices	Hardcopy files broken down by unique subjects and numbers as used in HQ's Records' Management.	<p>These files reflect very strongly the complaint handling/Enforcement/Seizure/Prosecution role of CCA's Consumer Products' Branch in the Regions and Districts.</p> <p>These files are more "product" than "establishment" oriented as they are Regional rather than district files.</p> <p>These files are not broken down to the level of detail that "Food files" are.</p> <p>Information on complaints, investigations, information can be found here.</p>	<ul style="list-style-type: none"> - Manuals are available to access these files like those found in HQ's Records' Management. - There is no linedex cross referencing as there is not specific records' staff available. - Relates to some degree the "Retail Food files" found at HQ's. 	<ul style="list-style-type: none"> - Rationale - Investigation process - Investigations - Inspection - Complaints/Inquiries - Communication - Headquarters/field relationship - Relationship to the legal system - Product class priorities - Compliance

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Communications Plan. Communications Branch.	Communications Services Branch	hard copy	Contains listing of projects to be undertaken by the Communication Services Branch, the activities to be undertaken during the project, the O&M budget allocated to the project and the status of the project.	- Plan produced on an annual basis with periodic progress memorandums.	- Communication/ Information

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Consumer Products Sub-Activity Implementation Plan (1982/83). Consumer Affairs Bureau.	Audit and Evaluation Branch, CCA	hard copy	<p>Includes plans of operations for the next fiscal year. describes the operations of the Consumer Products sub-activity, available resources, location of held operations and major issues facing the sub-activity.</p> <p>A detailed implementation plan is provided with a description of each work element, the date when the work element is to be completed, the resources (O&M costs and person days) allocated for the work element and the % of available resources taken up by the work element.</p> <p>Also included in the document is a description of the total resources available to Branch (person-years and O&M costs) and the location of field operations.</p>	<ul style="list-style-type: none"> - a good descriptive document outlining specific projects and activities undertaken by the Consumer Products Branch. - Time utilization summary is provided as an appendix, with information on the head-quarters component and field component. 	<ul style="list-style-type: none"> - Regulatory Development - Effectiveness Issue

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Daily clipping service	Communications Branch, 22nd Floor	hard copy, daily distribution	Press clippings from 12 daily newspapers. The primary basis for selection is topics of importance to the HQ's ministry - particularly where the minister could be or is being questioned in the house. The last section is TV or radio transcripts which would also reflect on the Department. Topics refer to the Department as a whole, but clippings are maintained in subject files some of which are pertinent to Marketing Practices Branch or Consumers Products Branch.	<ul style="list-style-type: none"> - There is regional content when an officer in the regions sends material in <u>but</u> the article or transcript must have global rather than regional flavour to be included. - The daily clipping service is microfilmed after 1 year. - During a current year only major articles are kept in subject files. - Date or newspaper access is through the publication itself. 	- Information/ Communication.

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Energuide files. Consumer Products Branch	Office of the Headquarter's Director of the program. 16th floor, Phase I, Place du Portage, Consumer Products Branch	Hardcopy files	<ul style="list-style-type: none"> o General information on the program. o Due to the unique connection this program has with the Canadian Standards Association (CSA), majority of files relate to this organization. o The files cover 13 broad subject areas: <ul style="list-style-type: none"> - energy efficiency program (general) - contracts/regulation - standards/ballots - technical subcommittees (CSA) - energy efficiency committee - cooperation and liaison - steering committee on performance of electrical products - TEC PEP (meeting) - project status report - energuide directory - administration/policy/press - marketing and advertising - branch administration 	<ul style="list-style-type: none"> - No inspections done by CCA. They are all done by CSA. - Files are organized by Records management but kept with the program director. 	<ul style="list-style-type: none"> o Shared areas of responsibility o Effectiveness issue o Communication

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Family Expenditure Division. Statistics Canada.	Tunney's Pasture	Hardcopy (on-line at Statistics Canada)	<p>2 surveys used by CCA.</p> <ol style="list-style-type: none"> 1. Family Food Expenditure. 2. Family Expenditure catalogue No's: 62-550 62-551 62-548 <p>Information is gathered on some 800 items, Food or Non-Food, price and quantity. The unit of information is a spending unit (group of people who pool income for major expenditures) within a household.</p> <p>All files on magnetic tape at Statistics Canada, only accessible to Statistics Canada.</p> <p>Surveys published in 2 years although most recent now is 1978. For Survey #1, 1982 survey to be released mid-1983, for Survey #2, 1982 survey to be released early 1984.</p> <p>Survey coverage: usually rural and urban, but weighted towards the urban. Drawn from Labour Force Area Sampling Frame.</p>	<p>CCA does not require much of Statistics Canada other than using these surveys.</p> <p><u>If</u> CCA wanted some information on family expenditure buy and the contents of the surveys, they would have 2 choices:</p> <ol style="list-style-type: none"> 1. Arrange a contract with Statistics Canada to prepare special tabulations of the desired material. 2. Purchase from this Division on micro-dot Data tape prepared for public use \$300. This tape contains micro data on the most important of the 800 items collected by the surveys. 	<ul style="list-style-type: none"> - Compliance - Consumer behaviour

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Food Division Files. Consumer Products Branch.	Regional Offices	Hardcopy Files	<p>These files are similar in subject breakdown to those that are maintained in Records Management HQ's and the numbering and subject access is similar to those controlled by HQ's.</p> <p>Information content tends to reflect "enforcement issues". For example, specific complaints are found in these files but they are by Product access only at the Regional level.</p> <p>In the Vancouver region, a separate establishment file is kept by company name when there is a label review.</p>	<p>Manuals with files system breakdown is the access to this system.</p> <p>Within each breakdown by subject and then product, files are in chronological order.</p>	<ul style="list-style-type: none"> - Complaints/Inquiries - Inspection process - Investigation/prosecution - Relationship to legal system

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Food files. Consumer Products Branch.	CCA Consumer Products' Branch. Regional Offices	Hardcopy files broken down by unique subject and numbering as used in HQ's Records' Management HQ's.	<p>These files reflect very strongly the complaint handling/Enforcement/Seizure/Prosecution role of CCA's Consumer Products' Branch in the Regions and Districts.</p> <p>These files, as they are <u>Regional files</u>, are "product" oriented rather than "establishment" oriented.</p> <p>Quite often the basis of a complaint file will have copies of CCA form #1566 (2-82), the Establishment report, but the content is still product oriented reflecting the Regional Specialists role.</p>	<ul style="list-style-type: none"> - Manuals are available to access these files like those found in HQ's Records' Management. - No linedex cross referencing is available as there is not the "Records" staff available. - Some policy directive, correspondence will HQ's in these files when warranted. - Would relate to some degree to HQ's "Manufactured Food files". 	<ul style="list-style-type: none"> - Rationale - Inspection in process - Inspection - Investigation/ Prosecution - Complaints/Inquiries - Communication - Headquarters/field relationship - Relationship to the legal system - Product class priorities - Compliance

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
HQ's time utilization Report. Consumer Products Branch.	HQ's - Consumer Products Branch	Computer Batch Products Branch	<ul style="list-style-type: none"> o Major breakdown by Division - i.e., Retail Food; Merchandise standards textiles. o Within that time usage in areas such as: <ul style="list-style-type: none"> - Program development - Program implementation - Impressed demand - Travel - Training and development - Program management - Support - Leave o Time breakdowns - <ul style="list-style-type: none"> 1 - In specific month 2 - Total in entire fiscal year 	- Based on CCA form #1640 (10-82) developed especially for HQ's functions.	- Effectiveness issue

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHI EVALUATION ISSUE
Health and Welfare. Field Operations Directorate.	Jean Mance Building	On-line Internal files hardcopy	<ul style="list-style-type: none"> - Own information gathered from analysis of products for their own programs. - This directorate carries out testing to determine food composition. The resulting analysis is not filed at H & W but is sent directly to CCA, Consumer Products Branch. - Interaction is between H & W regional offices and (ie., Halifax, Montreal, Toronto) CCA regional field offices, in Consumer Products Branch. - Testing of food composition is initiated in the regional offices via CCA regional offices and work itself is done in regions. - H & W in Ottawa have records of their budget spent on CCA activities in the regions. No other files on CCA related activities are kept. - H & W Regional File offices (Laboratories) keep records of food composition analysis. 	<ul style="list-style-type: none"> - A potential data based of CCA. Presently not used. - Accessible through the Field operations Directorate. 	<ul style="list-style-type: none"> - Traded goods - composition/compl - Inspection - Shared areas of responsibility

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Health and Welfare Food Directorate	At H & W Tunney's Pasture	On-line (tape output)	<p>Food compositions:</p> <ul style="list-style-type: none"> - Canadian Nutrient Data file a data base containing food nutrients available to anyone who requests it. - Ongoing, constantly updated, in 3rd year of 5 year development. 	<ul style="list-style-type: none"> - H & W data base heavily traded goods - composition overlaps with CCA data base. H & W do not <u>know</u> what data bases CCA have. - CCA may require H & W data on chemicals and ingredient labelling otherwise data bases very similar - Files of CCA (Consumer Products Branch) interaction with H & W are kept at H & W hardcopy form. - Often advice is ad hoc, by telephone, no record. 	<ul style="list-style-type: none"> - Share areas of responsibility - Inspection - Compliance
		Hardcopy (published volumes)	<ul style="list-style-type: none"> - Information on toxicology pesticides, additives, etc. - Some of this information may be restricted. 		

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION.	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Health Protection Branch	Health & Welfare Tunney's Pasture.		<ul style="list-style-type: none"> - No files are kept pertaining to traded goods or deceptive marketing practices but H & W acts in an advisory capacity for CCA if they need advice in investigating a fraud. H & W will provide background information. 	<ul style="list-style-type: none"> - <u>Informal</u> advisory function. - No files are kept on CCA or H & W interaction. 	<ul style="list-style-type: none"> - Communication - Shared areas of responsibility

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WIA EVALUATION ISSUES
Housekeeping files. Consumer Products Branch.	<ul style="list-style-type: none"> o HQ's - found in Records Management, 18th floor, Phase 1, Place du Portage. o District - with District Manager. o Regions - with Regional Managers. 	Hardcopy files.	<ul style="list-style-type: none"> o General files on finance, administration and personnel that are traditionally found in all government offices. o Policy documentation, directives, etc. that reflect the common activities of the Branch and are not product or establishment particular. o HQ's files reflect the Regulatory review aspects. 	<ul style="list-style-type: none"> - maintained at HQ's and in the Regions and Districts on the same style as Records Management. - more detailed linedex cross-referencing is available at HQ's. 	<ul style="list-style-type: none"> o Rationale o Effectiveness issue o Regulatory development o Regulatory reform o Inspection process (general) o Headquarter's/field relationship o Shared areas of responsibility o Prosecutions (general) o Relationship to legal system (general)

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Mailing/ Distribution Lists	Mail Room, Communication Branch, CCA	Mechograph	<ul style="list-style-type: none"> - Name and address of individuals who receive publications produced by the Communications Branch. These publications include: <ul style="list-style-type: none"> • news releases • brochure/pamphlet • speech • information bulletin • warning bulletin • backgrounder • report • synopsis 	<ul style="list-style-type: none"> - Mailing/distribution list is supposed to be computerized this year. - There is an instruction list for the mailing and distribution of publications. Groups/individuals represented on the list include: <ul style="list-style-type: none"> • Wire Services • Members of parliament • Press Gallery • CBC, CTV, newspapers • assistant and associate directors • regional directors • director generals and directors of CCAC • regional and district managers • consumer affairs offices of provincial and territorial governments • business editors • subscribers of Misleading Advertising Bulletin • etc. <p>(Listing is available from Communication Services Officers)</p>	- Information/ Communication

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Management Information Systems Consumer Products Branch. Regional and District Office	Management Services Branch. Planning and Control Division, 17th Floor, Phase I, Place du Portage, C.C.A.	<ul style="list-style-type: none"> - Computer Batch printouts - Hardcopy reports. 	<ul style="list-style-type: none"> o Regional reporting of time utilization in Consumer Products Branch is sent to this Branch in W.Q.s. This brings about a quarterly report that gives forecasted and actual information on program elements decided upon in the yearly implementation plan. This report gives 3 variances as well. o This with the narrative reports from Regional managers becomes the basis of the quarterly report activity report sent to the ADM, Consumer Affairs. 	<ul style="list-style-type: none"> - This MIS is being changed and by 1984 will be combined with new system being planned for Consumer Products Branch. 	<ul style="list-style-type: none"> o Effectiveness Issue

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUE?
Manufactured Food files	CCA Records Management, 18th Floor, Phase I, Place de Portage, N11, P.Q.	Hardcopy files broken down by unique subjects and numbers cross indexed by Records Management Manual and/or linedex.	<p>These files dealing with Manufactured food and the role of CCA's Consumer Product's HQ's Branch are broken into 11 broad categories and subdivided within these categories. The broad categories are:</p> <ul style="list-style-type: none"> - Food Division - general - Advertising - Consumer complaints and enquiries - Co-operation and liaison - Fish products surveillance - Labelling - Processed products - Registration - Surveillance and enforcement programs - Surveys and studies. <p>File content is Trade communiques, correspondence trade and tariff agreements and program information.</p>	<ul style="list-style-type: none"> - These files reflect Headquarters' activities. They are mainly correspondence and reflect the more policy orientation rather than enforcement/seizure seen in the districts and regions. - Would correlate to some degree to Regional files "Food files". 	<ul style="list-style-type: none"> - Rationale - Inspection in progress - Headquarters/field relationship - Investigation/Prosecution - Complaints and enquiries - Regulatory review

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Merchandise Standards Division Files	CCA Records Management, 18th Floor, Phase I, Place de Portage, Mtl, P.Q.	Hardcopy files broken down by unique subjects and numbers cross indexed by Manual and/or linedex.	These files created by Headquarters, Consumer Products Branch deals with Trade Marks, Markings in the area of Textiles, especially fur. The majority of Records in this grouping covers "Precious metals marking" and contain correspondence, directives or policy information on broad industry dealings, surveillance and enforcement, Foreign government marks, National marks, and Trade marks.	<ul style="list-style-type: none"> - These files reflect the role of the Headquarters' operation in this area. They are mainly correspondence and reflect the more policy orientation of Headquarters as opposed to the actual enforcement activities that takes place in the Regions and Districts. - Would correlate to some degree to Regional files "Precious Metal Marking". - Some interrelationship (minimal) to Regional textile files. 	<ul style="list-style-type: none"> - Rationale - Inspection in proc - Headquarters/field relationship - Investigation/ Prosecution - Complaints and enquiries - Regulatory review

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Ministerial Correspondence. Consumer Products Branch (Headquarters)	Office of the Director, Consumer Products Branch, 16th floor, Phase 1, Place du Portage. <u>OR</u> The office of the Minister, Consumer and Corporate Affairs.	Hardcopy file - arranged chronologically	<ul style="list-style-type: none"> o Responses to requests from the Minister's office. Letters that are responded to come from the following sources: <ul style="list-style-type: none"> (1) House of Commons MP's who have received letters from constituents concerning food or labelling or precious metals, etc. (2) letters to other Ministers concerning legislation, regulatory amendment, areas of common concern (3) Organization or groups who have made proposals to the department (4) letters from embassies and foreign countries about Canadian regulations or raising questions about "non-tariff trade barriers" i.e., difficulty in meeting labelling requirements (5) foreign complaints about Canadian products that are too much like foreign products, i.e., appellation of origin in wine (6) requests for information from schools, students (7) requests from manufacturers requesting information or guidance on advertising or other compliance issues (8) Some requests for information from provincial governments. 	<ul style="list-style-type: none"> - Majority of responses represent signed letters but some have never been signed - particularly when the Minister foresees problems that might become political. 	<ul style="list-style-type: none"> o Communication o Compliance o Areas of shared responsibility o Compliance o Regulatory development o Regulatory review o Complaints/Inquiries

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Press Releases/ Communiques	Distribution Centre, Phase II, 4th Floor, contact A. D'Aoust (Communications Services Branch)	hard copy	<p>The original narrative which is released to the media deals with various programs pertaining to the Department. Examples of Press Releases reviewed include:</p> <ul style="list-style-type: none"> - Energuide Label to Appear on Dishwashers and Clothes Washers - Energuide Label to Appear on Electric Ranges - Amendments made to Precious Metals Marking Act. 	<ul style="list-style-type: none"> - Gives reference to individuals in the Communications Services Branch - Distribution to media is decided by officer. There is an instruction sheet for the Communication Services Branch specifying the distribution (i.e., wire services, members of parliament, assistant and associate directors, head, chiefs, etc.) 	- Information/ Communication

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHI EVALUATION ISSUE!
Non-compliance ratios. Consumer Products Branch.	Planning and systems analysis. Consumer Products Branch, 16th Floor.	Computer batch out-put (monthly)	<p>This is a quarterly report that gives non-compliance ratios based on the following formula:</p> <p><u>Product Lots in violation</u> = % of non-compliance.</p> <p>Lots inspected</p> <ul style="list-style-type: none"> - Information from CCA form #1566- (2-82). - Each product type is looked at by 3 trade levels: Manufacturing; Retail; Import./Dist./Wholesale. - Each commodity is also broken down for compliance based on quality, quantity; label/Adv./Pkg. <p>The non-compliance information is very integral to the formulation of "dollars at risk".</p>	<p>This system is being revised and will look substantially different by April 1, 1984. The product compliance reports will change from "lot size" to "items inspected" and "establishment compliance" will be available.</p>	<ul style="list-style-type: none"> - Product class priorities - Program of compliance - HQ's/field relationship - Effectiveness issues

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Notes for Presentation to Departmental Orientation Course, December 1981. Consumer Products Branch.	Consumer Products	hard copy	- Describes history of Consumer Products Branch, its activities and programs	- good description and brief historical overview of the Branch	- Rationale

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Operations Review of the Consumer Products Sub-Activity, Final Report, June 1, 1981	Audit and Evaluation Branch, Consumer and Corporate Affairs	hard copy, report	<ul style="list-style-type: none"> - Report provides information on the background of the Consumer Products Branch and the manner in which the Branch is organized. It examines: <ul style="list-style-type: none"> • the objectives and goals of the Branch with those of the Consumer Affairs Bureau for consistency and clarity of linkages; • the adequacy of existing demographic data for human resource planning • the adequacy of the organization structure and areas of responsibility and authority • the adequacy of management controls, reporting systems • the clarity of the roles of regional and district specialists. - Highlights the weakness and makes recommendations regarding the statement of objectives and goals, the inconsistencies in roles and responsibilities with and between Branch and regions and deficiencies in measurement process and control. 	<ul style="list-style-type: none"> - Detailed working papers are available and provide further information and background material (Audit and Evaluation Branch) - Two years old, therefore some of the weaknesses may no longer exist. Follow-up interviews are required to determine extent to which recommendations have been implemented. 	<ul style="list-style-type: none"> - Rationale - Product Priorities - Headquarters/field relationship - Effectiveness issue

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Packaging and labelling files	CCA Records Management, 18th Floor, Phase I, Place de Portage, Hull, P.Q.	Hardcopy files broken down by unique subjects and numbers cross indexed by Record's Management Manual and/or linedex.	<p>These files deal with Packaging and labelling and CCA's Consumer Product's Branch HQ's activities. They are broken down in 9 broad categories and are subdivided more specifically within these file blocks. The broad categories are:</p> <ul style="list-style-type: none"> - General files - Canadian Standards Board - Co-operation and liaison - Enforcement program - Labelling - Packaging - Quantity assurance - Surveillance program - Products <p>File content is correspondence, meeting memorandum, studies and some specific problems especially in area of bilingual labelling. There are some draft cabinet papers and regional reports and plans.</p>	<ul style="list-style-type: none"> - These files reflect Headquarters' activities. They are mainly correspondence and reflect a more policy orientation rather than the enforcement/seizure/prosecution activities that take place in the Regions and Districts. - Ministerial correspondence can be found within these files under specific subjects. There is no special index. - These would correlate to some degree to Regional Packaging and labelling files. 	<ul style="list-style-type: none"> - Rationale - Inspection in process - Headquarters/field relationship - Investigation/Prosecution - Complaints and enquiries - Regulatory review

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Packaging and labelling files. Consumer Products Branch.	CCA Consumer Products' Branch Regional Offices	Hardcopy files - breakdown by the same unique subject and numbers as used in Records' Management	<p>These files reflect very strongly the complaint handling/enforcement/seizure/Prosecution role of CCA's Consumer Products' Branch in the Regions and Districts.</p> <p>These files are more "product" oriented than the "establishment" files held in the District offices. In this area, the products involved are very diverse so the files tend to be easier to follow under subjects like: "Complaints", "Seizure", "Prosecutions", and following chronologically.</p>	<p>Manuals are available to access these files offering a breakdown like HQ's records files. In Montreal, however, these files are not as well indexed and will not be improved until the office is moved and more space becomes available.</p> <p>There is no linedex cross-referencing to these files.</p> <p>Relates to HQ's "Packaging and labelling files" to some degree.</p>	<ul style="list-style-type: none"> - Rationale - Investigation process - Investigations - Inspection - Complaints/Inquiries - Communication - Headquarters/field relationship - Relationship to the legal system - Product class priorities - Compliance

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Precious Metals Files. Consumer Products Branch.	CCA Consumer Products' Branch. Regional Offices	Hardcopy files broken down by unique subjects and numbers as used in HQ's Records' Management.	<p>These files reflect very strongly the complaint handling/Enforcement/Seizure/Prosecution role of CCA's Consumer Products' Branch in the Regions and Districts.</p> <p>These files are more "product" than "establishment" oriented as they are Regional files but they are not as detailed as the food files.</p> <p>In Montreal, the seizure and prosecution files are very detailed for this grouping. The Pacific Specialists has separate "establishment" like files for his area.</p>	<ul style="list-style-type: none"> - Manuals are available to access these files like those found in HQ's Records' Management. - There is no linedex cross referencing is available as there is not the Records' staff available. - Relates to some degree the "Merchandise Standards Division Files" at HQ's. 	<ul style="list-style-type: none"> - Rationale - Investigation process - Investigations - Inspection - Complaints/Inquiries - Communication - Headquarters/field relationship - Relationship to the legal system - Product class priorities - Compliance

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Product class priority list. Consumer Products Branch.	Consumer Products Branch. Planning and systems analysis, 16th Floor (also used for planning in Regions).	1 page report, annual.	A list of 34 products inspected by Consumer Products Branch. They are ranked 1 to 34 based on their "Dollar at Risk" ratio.	This listing is to help direct HQ's and Regional staff in establishing priorities for the year.	<ul style="list-style-type: none"> - Product class priorities - HQ's/field relationship

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Regulatory Review binders. Consumer Products Branch	Office of the Director. Consumer Products Branch, 16th floor, Place du Portage.	6 Hardcopy looseleaf volumes.	<p>CCA has done a review of all existing regulations. The results of the analysis work done by Consumer Products' HQ's specialists with incorporated field commentary are found in six volumes which are:</p> <ul style="list-style-type: none"> (1) Food and Drug Act (2) National Trade Mark and True Labelling Regulations (3) Textile labelling and advertising regulations (4) Precious metals marking regulations (5) Consumer Products and labelling regulations (6) Canada agricultural products standards regulations. <p>Each one has a summary page outlining the number of proposed changes and then an index to the product, the regulation and the section in the text referred to. there is also a textual, detailed report.</p>		<ul style="list-style-type: none"> o Regulatory review o Shared areas of responsibility

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHA EVALUATION ISSUES
Retail Food Division files.	CCA Records Management, 18th Floor, Phase I, Place de Portage, Hull, P.Q.	Hardcopy files broken down by unique subjects and numbers and accessible only through a Record's Management linedex. No Manual access.	<p>These files deal with Retail food and CCA's Consumer Product's Branch HQ activities. They use a unique subject and numbering system from general to specific. As no manual exists to these files the broad categories are not as obvious.</p> <p>File content tends to be more policy related rather than product or establishment particular.</p>	<ul style="list-style-type: none"> - These files reflect HQ's more policy related role as opposed to the enforcement/seizure/prosecution activities of the Regional and district office. - These correlate to some degree to the Regional "Agricultural products" files maintained in Regional offices. - Because access is via linedex only greater staff assistance is required when using the files. 	<ul style="list-style-type: none"> - Rationale - Inspection in process - Investigation/Prosecution - Complaints/Inquiries - Headquarters/field relationship - Regulatory review

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Textile files. Consumer Products Branch.	CCA Consumer Products' Branch. Regional Offices	Hardcopy files broken down by unique subject and numbering as used in HQ's Records' Management.	<p>These files reflect very strongly the complaint handling/Enforcement/Seizure/Prosecution role of CCA's Consumer Products' Branch in the Regions and Districts.</p> <p>These files are more "product" rather than "establishment" oriented as they are Regional files <u>but</u> they are not as easy to use as the "Food files".</p> <p>Complaint files are product oriented as well but are maintained chronologically.</p> <p>Files such as "Care labelling" include infractions to Care labelling regulation intermingled with Departmental regulations and policy.</p>	<ul style="list-style-type: none"> - Manuals are available to access these files like those found in HQ's Records' Management. - No linedex cross referencing is available as there is not the Records' staff available. - Some policy information is held in the files as directives, memos etc. come from HQ's. - Would relate to some degree to HQ's "Textile labelling files" and to a lesser degree to parts of "Merchandise standards files". 	<ul style="list-style-type: none"> - Rationale - Investigation process - Investigations - Inspection - Complaints/inquiries - Communication - Headquarters/field relationship - Relationship to the legal system - Product class priorities - Compliance

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WHAT EVALUATION ISSUES
Textile Labelling files	CCA Records Management, 18th Floor, Phase I, Place de Portage, Hull, P.Q.	Hardcopy files broken down by unique subjects and numbers and accessible by Record's Management Manual and/or linedax.	<p>These files deal with Textile labelling and CCA's Consumer Product's Branch HQ's activities. They are broken down in 13 broad categories and are subdivided more specifically within these file blocks. The broad categories are:</p> <ul style="list-style-type: none"> - Textile labelling - general - Textile labelling - regulation - Canadian general standards board - Canadian standard size program - Care labelling program - Cooperation and liaison - Identification numbers - Laboratory compliance program - Surveillance and enforcement - Surveys - Test work - Upholstered and stuffed articles. <p>File content is policy related material, some information on specific complaints and enquiries by organization. Canada General Standard's Board information is very detailed with files existing on each CGSB committee. The "Laboratory Compliance Program" files contain charts and summary reports on products from 1977 to date. There are a number of specific case files in "surveillance and Enforcement" files as well as policy files.</p>	<ul style="list-style-type: none"> - These files reflect Headquarters' activities and are more policy oriented than the Regional files but they tend to reflect more of the enforcement/seizure/prosecution activities more deviously than other CCA Consumer Products Record's Management files. - These correlate to some degree to Textile files maintained in Regional offices. 	<ul style="list-style-type: none"> - Regulatory review - Rationale - Inspection in process - Compliance - Headquarters/field relationship - Investigation/Prosecution - Complaints and enquiries

TITLE	LOCATION	FORMAT	TYPE OF INFORMATION	OTHER COMMENTS	APPLICABLE TO WNA EVALUATION ISSUES
Videotapes. Communications Branch.	communication Services Branch, CCA	1 Video cassette and slides	<ul style="list-style-type: none"> - Films relating to various topics such as: <ul style="list-style-type: none"> . Misleading Advertising . Weights and Measures . Energuide . Precious Metals . Textile Labelling . Food at the Retail Level. 	<ul style="list-style-type: none"> - Used by inspectors in the field when making presentations, in kiosks, in shopping centres, trade shows, cable vision, etc. - Audio-visual catalogue is available. Listings are alphabetical, by topic and a catalogue number exists for each of the audio-visual presentations. - current listing of audio-visual video-tapes is maintained by Communication Services Branch 	- Information/ Communication

Annex C

Phase I Report on Departmental Plan
of Regulatory Review and Reform

July 1981

Consumer Products Branch

Review of Regulations

Annex C

Phase I Report on Departmental Plan
of Regulatory Review and Reform
July 1981

This appendix presents the results of the review exercise undertaken by the Consumer Products Branch in Phase I of the Regulatory Review and Reform program. The information presented in this appendix was extracted from the July 1981, Phase I Report on Departmental Plan of Regulatory Review and Reform.

The following sets of regulations were reviewed:

- National Trade Mark and True Labelling
- Food and Drug Regulations
- Consumer Packaging and Labelling
- Precious Metals Marking
- Textile Labelling and Advertising
- Agricultural Product Standards
 - Fresh Fruit and Vegetables
 - Processed Fruit and Vegetables
 - Dairy Products
 - Eggs
 - Processed Poultry
 - Maple Products
 - Honey

Section 2 to 25 inclusive of the Food and Drug Regulations have not been reviewed. Since the federal government's jurisdiction in the product areas covered in these sections has been brought into doubt, it has been decided that it would be more appropriate to await a resolution of the jurisdictional questions before undertaking the review.

Tabular summary sheets for these sets of regulations are presented at the end of this Annex.

According to the 1981 report, among the various groups of regulations, between 30% and 70% of the individual regulations within these groups would require more detailed study and consultation in Phase II prior to possible reform action in Phase III.

Proposed Future Action

In the 1981 report, tabular summaries indicate, by group of regulations, the projected completion targets for Phases II and III, the estimated person-month requirements, and the proposed consultation procedures to be followed.

However, many regulations administered by the Branch relate to retail level inspection of commodities under Acts controlled by Health and Welfare Canada and Agriculture Canada. Therefore it was suggested that close liaison with these Departments would be required to negotiate changes found necessary by Consumer and Corporate Affairs Canada.

With respect to the Agricultural Regulations which include the following: Fresh Fruit and Vegetables, Processed Fruit and Vegetables, Dairy Products, Eggs, Processed Eggs, Processed Poultry, Maple Products, and Honey Regulations, the estimated completion dates shown in the summaries were those that CCAC believed the Department of Agriculture would attempt to meet in completing work under Phases II and III. In fact, the control of the process by CCAC terminates with the completion of Phase I and the forwarding of our results, recommendations, etc. to the Department of Agriculture. The Department of Agriculture is responsible for these regulations and will decide when, with

whom, and on what subjects they may wish to open consultation. They may feel some responsibility to involve CCAC in the consultation process, however, they would not be obliged to do so.

In the case of the regulations for which this Department is totally responsible, it was anticipated that both Phases II and III would be completed in 1981-82 for the Precious Metals Marking Regulations. It was thought that there would likely be further regulations development in 1981-82 for Precious Metals Marking and, while this development would require consultations, that would not be considered as part of the regulation review exercise.

Regarding the regulations under the National Trade Mark and True Labelling Act, it was anticipated that the Phase II completion could be accomplished in 1981-82 for the following: Babcock Test Bottles and Pipettes, Canada Standard Measuring Cups and Spoons, Chamois Labelling, and Watch Jewels Marking Regulations.

With respect to the remaining regulations administered by the Branch, namely: the Consumer Packaging and Labelling Regulations, the Textile Labelling and Advertising Regulations, the Fur Garment Regulations, the National Trade Mark Garment Sizing Regulations, the Turpentine Labelling Regulations, and the Food and Drug Regulations, it was anticipated that 1982-83 would remain as the estimated completion date for Phase II with 1984-85 being similarly identified for the Phase III exercise.

In the following pages, tabular summary sheets are presented. These were taken from the July 1981 Phase I Report on Departmental Plan of Regulatory Review and Reform.

Sect.	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. III
	Fresh Fruit & Vegetables				23		
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)		-		83-84*	84-85*
		4(1) & 5-8 Retain					
9-26	Part III: Application	9-23 & 25-26 Retain					
	Marking	24 Further Study (housekeeping)		-		82-83*	83-84*
27-29	Part IV: Interprovincial	Retain	-	-	-	-	-
	Trade						
30-34	Part V: Exports	Retain	-	-	-	-	-
35-39	Part VI: Imports	Retain	-	-	-	-	-
40-43	Part VII: Inspection	Retain	-	-	-	-	-
44-48	Part VIII: Seizure and	Retain	-	-	-	-	-
	Detention						
49-55	Part IX: Fees	Retain	-	-	-	-	-
56-65	Part X: Registered Produce	Retain	-	-	-	-	-
	Warehouses						
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	Retain	-	-	-	-	-
	Packages						

*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.

[illegible]

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*See note Fresh Fruit & Vegetables table

[illegible]

*See note Fresh Fruit & Vegetables Table

*See note Fresh Fruit & Vegetables

[illegible]

*See note Fresh Fruit & Vegetables table

SECTION	SUB-HEADINGS OF REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COM. PH. II	EST. COM. PH. I
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	-----			
	INFORMATION TO BE SHOWN IN LABEL						
11	Information	Further Study Required	Mail	-----			
12	Dealer Identification	Further Study Required	Mail	-----			
	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	-----			

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

TABULAR SUMMARY OF FINDINGS IN PHASE I REGULATORY REVIEW

APPENDIX

SECTION	SUB-HEADINGS OF REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION PH. II	PH. I
	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	-----			
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	1982/83	S3/84

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

Section	REGISTRATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. FM, CPH	CONPA PH. II, PH.
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			
5.1	Exemption from Sec 7 of Act	Retain	-	-	-	-
6	Bilingual Requirements and Exemptions	Further study required (Test Market Provisions only)	mail	-		
7, 8,	Application of label to					
9, 10, 11	Prepackaged Product	Retain	-	-	-	-
12, 13	Part of label on which information to be shown	Retain	-	-	-	-
14, 15,	Size of Type in which					
16	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	-	-	-	-
21, 22	Manner of Declaring Net Quantity	Further study required (section 23 only)				
23	Quantity	Repeal (Item 10 of Table to 22(1) only)	mail	-		
24, 25	Units of Measurement	Retain	-	-	-	-
26, 27	27.1					

REGULATION		RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM. CPB	EST. COMPLE. PH. I, PH. II
28	Prepackaged Products Con-					
	sisting of Prepackaged Products					
	packaged Separately	Retain	-	-	-	-
29	Advertisements	Amend 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	Further study required (all)	mail	-		
	Sizes	Amend (36(1)(i)(i) and 36(5) only				
37	Capacity of Receptacles	Further study required	mail	-		
38	Tolerances	Retain	-	-	-	-
39, 40	Inspection	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 filing in the consultation phase, meetings may be required.

TRUE LABELLING REGULATIONS

REGULATION	RECOMMENDATION	CONSULTATION PROCESS	CPRB SUPPORT	EST. VI, CPR	PHASE	
					PH. II	PH. III
National Trade Mark Garment						
Sizing Regulations	Amend	Mail	-			
Babcock Test Bottles and						
Pipettes Regulations	Retain	-	-	-	-	-
Canada Standard Measuring						
Cups and Spoons						
Regulations	Further study required	Mail	Yes			
Charois 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.

Sect.	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETION	
						PH. II	PH. II
	Fresh Fruit & Vegetables				23		
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)		-		83-84*	84-85*
		4(1) & 5-8 Retain					
9-26	Part III: Application	9-23 & 25-26 Retain					
	Marking	24 Further Study (housekeeping)		-		82-83*	83-84*
27-29	Part IV: Interprovincial	Retain	-	-	-	-	-
	Trade						
30-34	Part V: Exports	Retain	-	-	-	-	-
35-39	Part VI: Imports	Retain	-	-	-	-	-
40-43	Part VII: Inspection	Retain	-	-	-	-	-
44-48	Part VIII: Seizure and	Retain	-	-	-	-	-
	Detention						
49-55	Part IX: Fees	Retain	-	-	-	-	-
56-65	Part X: Registered Produce	Retain	-	-	-	-	-
	Warehouses						
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	Retain	-	-	-	-	-
	Packages						

*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.

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SECTION	SUB-HEADINGS OF REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COM. PH. II	EST. COM. PH. I
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	-----			
	INFORMATION TO BE SHOWN IN LABEL						
11	Information	Further Study Required	Mail	-----			
12	Dealer Identification	Further Study Required	Mail	-----			
	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	-----			

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

SECTION	SUB-HEADINGS OF REGULATIONS	RECOMMENDATION	CONSULT. PROCESS	CREB SUPPORT	EST. PM, CPB	EST. COMPLETE PH. II	EST. COMPLETE PH. II
	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	-----			
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	1982/83	83/84

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

Section	REGULATION	RECOMMENDATION	CONSULT. PROCESS	CRES SUPPORT	EST. INT. CPH	COMPL. MR. IT, PH.
1. 2	Short Title & Interpretation	Retain	-	-	-	-
2	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	-	-	-
5.1	Exemption from Sec 7 of Act	Retain	-	-	-	-
6	Bilingual Requirements and Exemptions	Further study required (Test Market Provisions only)	mail	-	-	-
7, 8,	Application of label to					
9, 10, 11	Prepackaged Product	Retain	-	-	-	-
12, 13	Part of label on which information to be shown	Retain	-	-	-	-
14, 15,	Size of Type in which					
16	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	-	-	-	-
21, 22,	Manner of Declaring Net Quantity	Further study required (section 23 only)				
23	Quantity	Repeal (Item 10 of Table to 22(1) only)	mail	-	-	-
24, 25,	Units of Measurement	Retain	-	-	-	-
26, 27,	27.1					

12 '82-'83 ; '84-'85

- 1) Section 20 has been revised and the number remains unchanged.
- 2) As a result of the initial filing in the construction phase, more time may be required.

1. TRUE LABELLING REGULATIONS

REGULATION	RECOMMENDATION	CONSULT PROCESS	CDNR SUPPORT	DOT III CPR	PH. I	PH. III
National Trade Mark Garment						
Sizing Regulations	Amend	Mail	-			
Babcock Test Bottles and						
Pipettes Regulations	Retain	-	-	-	-	-
Canada Standard Measuring						
Cups and Spoons						
Regulations	Further study required	Mail	Yes			
Charois 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.

[illegible]

Annex E

List of Background Studies

Annex E

List of Background Studies

The following studies were undertaken to provide input for this pre-evaluation assessment. Copies of these studies are available and will be provided by the Program Evaluation Division upon request.

1. Consumer Choice: Literature Survey, Issues Relevant to Traded Goods and Deceptive Marketing Practices by Kotowitz Economic Research Inc. March, 1983. 57 pages
2. Policy Alternatives for Product Misrepresentation by Mathewson Economic Consultants Inc. March 1983. 42 pages
3. Fraud Amongst Buyers and Sellers: Market, Legal and Other Remedies by Leon Courville and Reuven Brenner. March 1983. 55 pages
4. Paper on Factors and Issues for a Program Evaluation Plan for Traded Goods and Deceptive Marketing Practices for the Department of Consumer and Corporate Affairs by Peter Eglington Associates March 1983. 22 pages

The following consulting firms provided advice and contributed input for the production of this assessment study.

1. Peat Marwick and Partners provided notes on branch operations and potential issues for evaluation and undertook a review of potential data bases.
2. Price Waterhouse provided advice on evaluation procedures, evaluation issues and the component logic model.

3. Peter Eglington and Associates and CPER Associates reviewed the draft assessment study and provided comments and suggestions.

4. The draft assessment study also benefitted from review and comment by the Office of the Comptroller General and the the Office of Regulatory Reform.

Annex D

Evaluation Methodologies and Questions

Evaluation Methodologies-and Questions

This Annex presents a detailed list of potential evaluation questions that could be addressed by each of the methodologies described in Chapter IV of the report. In chapter IV, following the description of each methodology, only some examples of potential questions were provided to reduce the length of the text. However, the content of this Annex will be highly useful in providing further direction to staff and outside consultants who will be undertaking the various study modules. The following sections provide a list of questions to be addressed by each methodology proposed in the report.

I. Literature Review

Potential evaluation questions that could be addressed through a literature review are the following:

A) Rationale Issues

- What are the circumstances under which informational imperfections are likely to arise?
- In which Canadian consumer markets are conditions for informational market failures most likely to be present?
- Are there areas of consumer markets not now subject to the component's activities, which should be considered?
- Are government interventions inhibiting and/or preventing market forces from exercising their role in redressing the situation?
- What type of information is required by consumers in order to facilitate effective consumer choices?
- What are the key factors/variables affecting the costs and benefits of different levels of intervention?
- Are present environmental, economic, social, behavioural or other conditions different from those prevailing at the time all or part of the component's activities were introduced?
- To what extent do Canadian consumers utilize information prior to make a purchasing decision?

- What are the factors affecting the Canadian consumer's use of information?
- Do particular consumer or product characteristics create conditions favourable to the existence of informational gaps? Can these be related to specific cases or types of products/commodities?
- Which means, remedies could be considered when studying the most appropriate way to respond to consumer informational market failures?

B) Impacts and Effects Issues

- What effects do regulations and standards have on the efficiency, orderliness and economy in particular sectors of the marketplace?
- How are regulations/standards affecting the capability of Canadian producers to compete domestically? Internationally?
- Who should benefit from the provision of information through standards/regulations?

C) Alternatives issues

- Are there alternative corrective actions that could be considered based on economic or marketing theories? What are these corrective actions?
- What are the informational market failures that the component's activities are designed to correct? What are

the reasons for the existence of these informational market failures?

- Would alternative corrective actions be relevant for the correction of specific informational market failures which the component is expected to solve?
- Under what circumstances would the alternative corrective actions be more appropriate?
- For which products/commodities and/or services are the alternative corrective actions more applicable? What are the variables/factors affecting the extent of applicability of alternatives?
- Are there countries which choose different approaches to correct the type of informational market failures that the component's activities and outputs are expected to correct? For which specific products/commodities and/or services were alternatives applied? To what extent were these alternatives effective in these countries? Why were they effective? How was their effectiveness measured?
- What factors other than cost-effectiveness measures can be used to assess a) the effectiveness of each alternative? and b) its desirability from a social point of view?

II. Sets of Interviews

Potential evaluation questions identified in Chapter II of the report which could be pursued in the case of each set of interviews can be stated as follows.

A) Federal interviews:

i) Rationale issues

- Are the consumer products/commodities now subject to the component's activities part of Canadian consumer markets where informational market failures can be expected to occur or already exist?
- Are there areas of consumer markets not now subject to the component's activities, which should be considered?
- Are government interventions inhibiting and/or preventing market forces from exercising their role in redressing the situation?
- Is the type of information provided by the regulations/standards administered by the component related to known consumer information needs?
- To what extent is the ranking of consumer problems as established by the component to guide resource allocation decisions consistent with the priority given to them by consumers themselves?
- Is it possible to "tailor" the level of intervention to specific consumer products/commodities and/or services sectors?
- Is it possible to distinguish essential, beneficial and cost/effective levels of intervention?

- If socio-economic environmental conditions have changed, would the changes justify a re-orientation or change in the rationale for the component?
- Are the regulations/standards administered by the component assisting Canadian consumers in differentiating between products and reducing the informational gaps?
- When consumer problems arise that may indicate a need for the component's intervention, what are the various alternatives considered to deal with problem areas?
- What are the variables/factors influencing the selection of particular corrective actions?
- Could the outputs generated by the remedies be plausibly linked to the attainment of the objectives of the component?
- Are the present component's outputs plausibly linked to the objectives of the component?

ii) Impacts and effects issues

- Do the stated component's objectives correspond to impacts and effects expected to result from the component's activities and outputs?
- Would it be possible to state the intended impacts/effects in a more appropriate way?
- Are there other intended impacts/effects which should be considered but which are not formally stated?

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- To what extent is it plausible to link the component's activities and outputs to the stated and/or unstated intended impacts/effects?
- Is it possible for regulations/standards to favour market inefficiencies such as increases in costs/prices and decreases in competition? Under which conditions would these occur?
- How are regulations/standards affecting the capability of Canadian producers to compete domestically? Internationally?
- Are potential unintended impacts/effects recognized at the time regulations/standards are proposed and implemented? How do they impact on the expected benefits of the component's activities? Have these potential unintended impacts/effects changed over time?
- Are there regional differences in the occurrence and seriousness of consumer problems?
- To what extent are these regional differences significant?
- To what extent does the national approach taken to solve problems generate negative impacts/effects in some regions? How are these affecting the magnitude of the overall impacts/effects of the component?
- To what extent is it possible to reflect regional differences in proposals for corrective actions?

- To what extent is it possible to reduce negative impacts/effects by recognizing regional differences in proposals for corrective actions?
- Who actually benefits from the component's activities (society at large, special groups, low, middle or high income, well-educated or uneducated, traders, consumers, politicians, etc.)? Can regional differences be identified?

iii) Achievement of objectives issues

- Are the objectives clearly defined and consistent with the component's mandate? If no, can the objectives be stated in a more appropriate way in order to reflect what is expected from the component's activities?
- Which objectives not actually stated could be added as a consequence of the component's mandate?
- Did the objectives of the component evolve over time? Which variables/factors have caused a re-statement of the component's objectives?
- How are the existing objectives of the component perceived and interpreted by a) CCAC's senior management? b) Traded Goods component staff?
- Why is it realistic to expect the component's activities to result in the achievement of the stated objectives?
- What are the links between the component's mandate, activities and outputs that would logically lead to the expectation that the activities will result in the component meeting its objectives?

- In which areas is it possible to encounter overlap or duplication in the activities performed by other CCAC components, other Federal departments, and the provinces as regards consumer protection against product misrepresentation?
- What are the objectives of these particular activities? Are these the same as the component's objectives? Are these clearly defined in terms of consumer protection?
- To what extent is it possible to exclusively apportion areas of consumer protection to a) the component? b) other federal departments? c) provincial jurisdictions?
- To what extent would this division reduce or eliminate overlap, duplication in the achievement of objectives?
- What would be the net benefits of eliminating or reducing overlap or duplication if it exists? Would it be beneficial to integrate all CCAC's and other federal departments' activities dealing with consumer protection?
- Where no formalized delineation has been established, would it be beneficial to formally delineate the role of each program responsible for part of the attainment of the component's objectives?
- What are the various alternatives considered by the component when attempting to solve a particular consumer problem?

B- Provincial Interviews:

i) Impacts and effects issues

- To what extent is it plausible to link the component's activities and outputs to the stated and/or unstated intended impacts/effects?

ii) Achievement of objectives issues

- In which areas is it possible to encounter overlap or duplication in the activities performed by the provinces as regards consumer protection against product misrepresentation?
- What are the objectives of these particular activities? Are these the same as the component's objectives? Are these clearly defined in terms of consumer protection?
- To what extent is it possible to exclusively apportion areas of consumer protection to a) the component? b) provincial jurisdictions?
- To what extent would this division reduce or eliminate overlap/duplication in the achievement of objectives?
- What would be the net benefits of eliminating or reducing overlap/duplication if it exists?
- Where no formalized delineation has been established, would it be beneficial to formally delineate the role of each program responsible for part of the attainment of the component's objectives?

C. Foreign Interviews

i) Alternatives issues

- Are there countries which choose different approaches to correct the type of informational market failures that the component's activities and outputs are expected to correct? For which specific products/services were alternatives applied? To what extent were these alternatives effective in these countries? Why were they effective? How is their effectiveness measured?

ii) Rationale issues

- What is the most appropriate or optimal level of intervention?
- Is it possible to distinguish essential, beneficial and cost-effective levels of intervention?
- What are the key factors/variables affecting the costs and benefits of different levels of intervention?
- Are the regulations/standards administered under the foreign programs assisting consumers in differentiating
- When consumer problems arise that may indicate a need for government intervention, what are the various alternatives considered to deal with problem areas?
- What are the variables/factors influencing the selection of particular corrective actions by the component?

- Which means/remedies are considered in foreign countries when studying the most appropriate way to respond to consumer informational market failures?
- In countries where no regulations exist (in sectors which are regulated in Canada), how do consumers react and to what extent do they search for ways to fill their informational gaps?
- In countries where no regulations exist, are traders motivated to supply the type of information mandated by the Canadian regulations? If yes, how much do they provide? For which specific products/commodities? What provides this motivation?

iii) Impacts and effects issues

- What effects do regulations and standards have on the efficiency, orderliness and economy in particular sectors of the marketplace in countries where they are implemented?
- Is it possible for regulations/standards to favour market inefficiencies such as increases in costs/prices and decreases in competition? If yes, under which conditions would these occur?

III. Surveys

A) Survey of Companies:

In the case of the survey of companies it is expected that the following evaluation questions could be addressed:

i) Rationale issues

- In which Canadian consumer markets are conditions for informational market failures most likely to be present?
- To what extent does the prevalence of existing informational market failures constitute significant gaps for the efficiency of consumer markets?
- Are government interventions inhibiting and/or preventing market forces from exercising their role in redressing the situation?
- What type of information is required by consumers in order to facilitate effective consumer choices?
- What is the most appropriate or optimal level of intervention?
- Is it possible to distinguish essential, beneficial and cost/effective levels of intervention?
- What are the key factors/variables affecting the costs and benefits of different levels of intervention?
- Are present environmental, economic, social, behaviour or other conditions different from those prevailing at the time when all or part of the component's activities were introduced?
- If socio-economic environmental conditions have changed, would the changes justify a re-orientation or change in the rationale for the component?

- Given the current socio-economic environment, are the goods and services affected by the component's activities the right ones? Should the list be contracted or expanded?
- To what extent would market forces be expected to correct all or part of consumer informational problems (given present socio-economic conditions and traders' code of ethics)?

ii) Alternative issues

- Which means, remedies could be considered when studying the most appropriate way to respond to consumer information market failures?
- Would these means, remedies generate outputs similar to the ones derived from the component's activities? What type of outputs could be expected from these remedies?
- What are the costs (public and private) associated with the implementation of each alternative? How can these costs be estimated? Are there variables/factors influencing the magnitude of these costs? Are there hidden costs that cannot be estimated? Are there variable costs subject to changes over time? Are there regional differences in the costs of each alternative? By whom are costs likely to be borne?
- For which alternatives do benefits outweigh the costs? Is this the case for the existing corrective actions?

- In the absence of regulations, would traders be motivated to supply the type of information mandated by the regulations? If yes, how much would they provide? For which specific products/commodities? What provides this motivation?
- In the absence of regulations, how would consumers react and to what extent would they search for ways to fill their informational gaps?

iii) Impacts and effects issues

- Given the component's activities and outputs, what are the unintended impacts/effects that could result from the component?
- What effects do regulations and standards have on the efficiency, orderliness and economy in particular sectors of the marketplace?
- Is it possible for regulations/standards to favour market inefficiencies such as increases in costs/prices and decreases in competition? Under which conditions would these occur?
- How are regulations/standards affecting the capability of Canadian producers to compete domestically? Internationally?
- Is it possible to determine the magnitude of these potential unintended effects? How would these be measured? What is the magnitude?

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- Is it possible to change the magnitude/extent of negative impacts/effects without negatively affecting the benefits? How would it be possible?
- What are the costs of these impacts/effects?
- Is it possible to determine some undesirable impacts/effects?
- Are there regional differences in the occurrence and seriousness of consumer problems?
- To what extent are these regional differences significant?
- To what extent does the national approach taken to solve problems generate negative impacts/effects in some regions? How are these affecting the magnitude of the overall impacts/effects of the component?
- To what extent is it possible to reflect regional differences in proposals for corrective actions?
- To what extent is it possible to reduce negative impacts/effects by recognizing regional differences in proposals for corrective actions?
- How are traders affected by the provision of standards/regulations? Do traders favour mandatory standards as opposed to voluntary ones? Why?
- Are regulations/standards unfair to smaller traders? Can these be considered as barriers to entry in some industries? Which ones?

- Can regional differences be identified regarding the manner in which regulations/standards are affecting traders in general? In particular industries?
- Which industries are more affected by the legislation and regulations? What is the economic structure of these particular industries? Which variables are influencing the purchasers' decision-making process within these affected industries?
- How are regulations/standards affecting importers? Exporters? To what extent are regulations/standards affecting the performance of Canadian producers abroad? Which ones are more affected?

iv) Achievement of objectives issues

- In which areas is it possible to encounter overlap or duplication in the activities performed by other CCAC's components, other Federal departments, and the provinces as regards the consumer protection against product misrepresentations?
- What would be the benefits of eliminating or reducing overlap, duplication if it exists? Would it be beneficial to integrate all CCAC's and other federal departments' activities dealing with consumer protection?
- To what extent and how are international standards affecting the various groups on which the component's activities have an impact?

B) Survey of the Public:

It is expected that the public survey will provide information on the following potential evaluation questions:

i) Rationale issues

- Are the consumer products/commodities now subject to the component's activities part of Canadian consumer markets where informational market failures can be expected to occur or already exist?
- Are there areas of consumer markets not now subject to the component's activities, which should be considered?
- What type of information is required by consumers in order to facilitate effective consumer choices?
- Is the type of information provided by the regulations/standards administered by the component related to known consumer information needs?
- To what extent is the ranking of consumer problems as established by the component to guide resource allocation decisions consistent with the priority given to them by consumers themselves?
- To what extent do Canadian consumers utilize information prior to make a purchasing decision?
- To what extent are the types of information (quality, composition, quantity, labelling and packaging standards) that the component ensures Canadian consumers are provided with, significant to their decision-making process?

- What are the factors affecting the Canadian consumer's use of information?
- Is the information provided through the component's activities useful to facilitate the consumer's decision-making process? Are Canadian consumers actually using the information?
- Are consumers aware of the utility of the information provided through the regulations/standards developed by the component?
- Do particular consumers' characteristics favour the existence of informational gaps? Can these be related to specific cases or types of products/commodities?
- Are the regulations/standards administered by the component assisting Canadian consumers in differentiating products and reducing informational gaps?
- In the absence of regulations, how would consumers react and to what extent would they search for ways to fill their informational gaps?

ii) Impacts and effects issues

- Are there regional differences in the occurrence and seriousness of consumer problems? Are these significant?
- Who actually benefits from the component's activities regarding the information about goods and services, (society at large, special groups, high income, well-educated, traders, consumers, politicians, etc.)? Can regional differences be identified?

iii) Achievement of objectives issues

- Were consumers actually protected against product misrepresentation through the development of standards/regulations by the component? Under which conditions?
- Was the information provided through the component's activities used to facilitate consumer choices and differentiation among products?
- What would have happened if some products/commodities had not been regulated?
- Are there other activities which could be considered as alternative means of delivering the component's outputs?

IV. Expert Opinion:

Potential evaluation questions that could be addressed in the expert opinion module are presented below:

i) Rationale issues

- What are the circumstances under which informational imperfections are likely to arise?
- In which Canadian consumer markets are conditions for informational market failures most likely to be present?
- Are the existing government interventions as depicted by the component's activities addressing the type of informational market failures identified in Canadian consumer markets?

- Are government interventions inhibiting and/or preventing market forces from exercising their role in redressing the situation?
- What type of information is required by consumers in order to facilitate effective consumer choices?
- Is the type of information provided by the regulations/standards administered by the component related to known consumer information needs?
- To what extent is the ranking of consumer problems as established by the component to guide resource allocation decisions consistent with the priority given to them by consumers themselves?
- What is the most appropriate or optimal level of intervention?
- What are the key factors/variables affecting the costs and benefits of different levels of intervention?
- Are present environmental, economic, social, behavioural or other conditions different from those prevailing at the time all or part of the component's activities were introduced?
- If socio-economic environmental conditions have changed, would the changes justify a re-orientation or change in the rationale for the component?
- Given the current socio-economic environment, are the goods and services affected by the component's activities the right ones? Should the list be contracted or expanded?

- To what extent would market forces be expected to correct all or part of consumer informational problems (given present socio-economic conditions and traders' code of ethics)?
- To what extent do Canadian consumers utilize information prior to make a purchasing decision?
- To what extent are the types of information (quality, composition, quantity, labelling and packaging standards) that the component ensures Canadian consumers are provided with, significant to their decision-making process?
- What are the factors affecting the Canadian consumer's use of information?
- Does the information provided through the component's activities facilitate consumer's decision-making process? Are Canadian consumers actually using the information?
- Are consumers aware of the utility of the information provided through the regulations/standards developed by the component?
- Do particular consumer or product characteristics create conditions favourable to the existence of informational gaps? Can these be related to specific cases or types of products/commodities?
- Are the regulations/standards administered by the component assisting Canadian consumers in differentiating between products and reducing the informational gaps?

- Which means, remedies could be considered when studying the most appropriate way to respond to consumer informational market failures?
- Could the outputs generated by the remedies be plausibly linked to the attainment of the objectives of the component?
- Are the present component's outputs plausibly linked to the objectives of the component?

ii) Impacts and effects issues

- Do the stated component's objectives correspond to impacts and effects expected to result from the component's activities and outputs?
- To what extent is it plausible to link the component's activities and outputs to the stated and/or unstated intended impacts/effects?
- To what extent and how could these intended impacts/effects be quantified?
- Is it possible for regulations/standards to favour market inefficiencies such as increases in costs/prices and decreases in competition? Under which conditions would these occur?
- How are regulations/standards affecting the capability of Canadian producers to compete domestically? Internationally?

- Are there regional differences in the occurrence and seriousness of consumer problems? Are these significant? Is it possible to reflect regional differences in proposals for corrective actions?

iii) Achievement of objectives issues

- How realistic are the objectives considering the nature and scope of the component's activities?
- Why is it realistic to expect the component's activities to result in the achievement of the stated objectives?
- What are the links between the component's mandate, activities and outputs that would logically lead to the expectation that the activities will result in the component meeting its objectives?

iv) Alternatives issues

- Are there alternative corrective actions that could be considered based on economic or marketing theories? What are these corrective actions?
- In general, what are the advantages/disadvantages of the various alternatives that have been identified?
- To what extent is it possible for the identified alternatives to achieve the component's objectives?
- Would the alternative corrective actions previously identified, be relevant for the correction of specific informational market failures which the component is expected to solve?

- Under what circumstances would the alternative corrective actions be more appropriate?
- For which products/services are the alternative corrective actions more applicable? What are the variables, factors affecting the extent of applicability of alternatives?
- To what extent is each alternative under consideration incentive compatible with market incentives? For which products/commodities and/or services would this principle be more important? To what extent would the non-respect of this principle affect the effectiveness of the alternative? Which conditions/favours favour the attainment of this principle?
- To what extent is each alternative under consideration flexible enough to induce the future behaviour of economic agents? For which particular products/commodities and/or services, would it be important to satisfy this principle? To what extent would the non-satisfaction of this principle affect the effectiveness of the alternative in question? Which conditions/factors favour the satisfaction of this principle?
- Are there countries which choose different approaches to correct the type of market failures that the component's activities and outputs are expected to correct? For which specific products/commodities and/or services were alternatives applied? To what extent were these alternatives effective in these countries? Why were these alternatives effective in these countries? Why were they effective? How was the effectiveness measured?

- What are the benefits to be derived from each alternative? Can these be estimated and how? Are there intangible benefits which cannot be measured? What are they? Are the benefits changing over time? What are the variables/factors affecting the magnitude of the benefits? To whom are the benefits likely to accrue?
- What are the costs associated with the implementation of each alternative? Are there variables/factors influencing the magnitude of these? Are there hidden costs that cannot be estimated? Are there variable costs subject to changes over time?
- What factors other than cost-effectiveness measures can be used to assess a) the effectiveness of each alternative and b) its desirability from a social point of view?

V. Case studies

a) Evaluation study

Potential evaluation questions that could be addressed by the case study module of regulated and non-regulated products/commodities are stated below:

i) Rationale issues

- Are the consumer products/commodities now subject to the component's activities part of Canadian consumer markets where informational market failures can be expected to occur or already exist?
- Are there areas of consumer markets not now subject to the component's activities, which should be considered?

- Are government interventions inhibiting and/or preventing market forces from exercising their role in redressing the situation?
- Is the type of information provided by the regulations/ standards administered by the component related to known consumer information needs?
- Is it possible to distinguish essential, beneficial and cost/effective levels of intervention?
- If socio-economic environmental conditions have changed, would the changes justify a re-orientation or change in the rationale for the component?
- Given the current socio-economic environment, are the goods and commodities affected by the component's activities the right ones? Should the list be contracted or expanded?
- Which means, remedies could be considered when studying the most appropriate way to respond to consumer informational market failures?
- In the absence of regulations, would traders be motivated to supply the type of information mandated by the regulations? If yes, how much would they provide? For which specific products/commodities?
- Would these means/remedies generate outputs similar to the ones derived from the component's activities? What type of outputs could be expected from these remedies?

ii) Impacts and effects issues

- Given the component's activities and outputs, what are the unintended impacts/effects that could result from the component?
- What effects do regulations and standards have on the efficiency, orderliness and economy in particular sectors of the marketplace?
- Is it possible for regulations/standards to favour market inefficiencies such as increases in costs/prices and decreases in competition? Under which conditions would these occur?
- How are regulations/standards affecting the capability of Canadian producers to compete domestically? Internationally?
- Is it possible to determine the magnitude of potential unintended effects? How would these be measured?
- Is it possible to change the magnitude/extent of negative impacts/effects without negatively affecting the benefits? How would it be possible?
- To what extent does the national approach taken to solve problems generate negative impacts/effects in some regions? How are these affecting the magnitude of the overall impacts/effects of the component?
- To what extent is it possible to reduce negative impacts/effects by recognizing regional differences in proposals for corrective actions?

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- How are traders affected by the provision of standards/regulations? Do traders favour mandatory standards as opposed to voluntary ones? Why?
- Are regulations/standards unfair to smaller traders? Can these be considered as barriers to entry in some industries? Which ones?
- Which industries are more affected by the legislation and regulations? What is the economic structure of these particular industries? Which variables are influencing the purchasers' decision-making process within these affected industries?
- How are regulations/standards affecting importers? Exporters? To what extent are regulations/standards affecting the performance of Canadian producers abroad? Which ones are more affected?
- To what extent are Canadian consumers affected by the impacts/effects that the regulations/standards have on the level of imported goods/commodities? On their prices?
- What are the quantifiable benefits resulting from the component's activities? What is the level of these quantifiable benefits?
- What are the non-quantifiable benefits? How can these be assessed?
- What are the costs of these impacts/effects?
- Is it possible to determine some undesirable impact/effects?

- To what extent is it possible to reduce or eliminate these and at the same time reduce costs without affecting the level of benefits?
- To what extent is it possible to increase the net benefits?

iii) Achievement of objectives issues

- In which areas is it possible to encounter overlap or duplication in the activities performed by other CCAC components, other Federal departments, and the provinces as regards consumer protection against product misrepresentation?

iv) Alternatives issues

- Are there other alternative corrective actions that could be considered? What are these other corrective actions?
- In general, what are the advantages/disadvantages of the various alternatives that have been identified?
- What are the costs (public and private) associated with the implementation of each alternative? How can these costs be estimated? Are there variables/factors influencing the magnitude of these costs? Are there hidden costs that cannot be estimated? Are there variable costs subject to changes over time? Are there regional differences in the costs of each alternative?
- What are the benefits to be derived from each alternative? Can these be estimated and how? Are there intangible benefits which cannot be measured? What are

they? Are the benefits changing over time? What are the variables/factors affecting the magnitude of the benefits? //

b) Regulatory evaluation study

In the case of the Regulatory evaluation study the following potential evaluation questions could be addressed through the case study methodology:

i) Relevance of Regulations Issues

- What are the objectives (both formal and informal) of the regulations under study? Are these clearly defined? Would informal objectives be more appropriate?
- Did socio-economic conditions change since the introduction of the regulations? If yes, in what respect did they change? To what extent do these changes affect the relevance of the regulations?
- Have other similar programs/regulations (federal and/or provincial) been implemented since the introduction of these regulations? To what extent do these overlap or duplicate the regulations being studied? Are the objectives for these programs/regulations similar to the ones pertaining to the regulations in question?
- Who benefits from the regulations? Are there regional differences in the distribution of the target population? To what extent are target groups affected by the regulations?

- What is the magnitude of the value of goods and commodities subject to these regulations? Has the value of goods and commodities changed over time? To what extent has it changed?

ii) Impacts and Effects Issues

- What are the impacts and effects resulting from the regulations on the affected parties? on the economy in general (inflation, unemployment)? How are these distributed among parties?
- Did the impacts and effects contribute to the achievement of the objectives of the regulations?
- Are unintended impacts and effects counteracting or re-enforcing the intended ones? To what extent?
- What is the economic value of the benefits consumers derive from these regulations? In particular, what is the value of the reduction in information gathering costs? What is the value of avoiding wrong purchases?
- What is the value of the regulatory activity for those being regulated? What is the value of possible non-tariff trade protection that could result from the Traded Goods regulations?
- To what extent do other interested parties benefit from the regulations?
- What are the costs of the regulations being analysed? Who bears the costs of these regulations? Are the prices of consumer products affected by the regulations? What is the value of the changes in prices?

- What is the opportunity cost to society of these regulations? What is the value of the reduction in product diversity resulting from the implementation of the regulations?
- In the case of each party affected by the regulations, is it possible to determine the cost/benefit ratio or the present value of net benefit?
- To what extent and how can the costs and benefits of the unintended impacts and effects affect the effectiveness of the regulations?

iii) Types and Level of Standardization

- What types of standards are mandated through these regulations? Are those standards appropriate to achieve the objectives of the regulations? Are those appropriate given the actual socio-economic conditions?
- Given the products/commodities regulated, is it possible to develop different standards to meet the objectives of the regulations?
- What would happen in the absence of these standards?
- What was the structure of the industry affected by the standards prior to their implementation? What is the present structure of the industry?
- If the structure of the industry has changed, to what extent is the change due to the implementation of standards?

- What was the price structure of the markets affected by the standards prior to their imposition? What is it now? To what extent have standards impacted on the price structure? To what extent has the implementation of standards resulted in a reduction of products available within the economic sector affected by them?
- What is the value of the benefits derived from the standards imposed by the regulations? Who benefits from them?
- What are the costs of these standards? Who is supporting these costs?
- How would a change in the level or type of standardization affect both the costs and benefits expected from the standards?
- Is there a minimum level of standardization necessary for specific products/commodities markets to function effectively? Are present regulations ensuring that this minimum level is attained?

VI. Consultations

A) Consultations with Consumer Groups/Associations

i) Rationale issues

- In which Canadian consumer markets are conditions for informational market failures most likely to be present?

- To what extent does the prevalence of existing informational market failures constitute significant gaps for the efficiency of consumer markets?
- Are there areas of consumer markets not now subject to the component's activities, which should be considered?
- Are the existing government interventions as depicted by the component's activities addressing the type of informational market failures identified in Canadian consumer markets?
- What type of information is required by consumers in order to facilitate effective consumer choices?
- To what extent is the ranking of consumer problems as established by the component to guide resource allocation decisions consistent with the priority given to them by consumers themselves?
- Are present environmental, economic, social, behavioural or other conditions different from those prevailing at the time all or part of the component's activities were introduced?
- To what extent do Canadian consumers utilize information prior to make a purchasing decision?
- To what extent are the types of information (quality, composition, quantity, labelling and packaging standards) that the component ensures Canadian consumers are provided with, significant to their decision-making process?

- What are the factors affecting the Canadian consumer's use of information?
- Does the information provided through the component's activities facilitate consumer's decision-making process? Are Canadian consumers actually using the information?
- Are consumers aware of the utility of the information provided through regulations/standards developed by the component?
- Do particular consumer or product characteristics create conditions favourable to the existence of informational gaps? Can these be related to specific cases or types of products/commodities?
- Are the regulations/standards administered by the component assisting Canadian consumers in differentiating between products and reducing the informational gaps?
- Which means, remedies could be considered when studying the most appropriate way to respond to consumer informational market failures?
- In the absence of regulations, how would consumers react and to what extent would they search for ways to fill their informational gaps?
- Would these means, remedies generate outputs similar to the ones derived from the component's activities? If no, what type of outputs could be expected from these remedies?

- Could the outputs generated by the remedies be plausibly linked to the attainment of the objectives of the component? //
- Are the present component's outputs plausibly linked to the objectives of the component?

ii) Impacts and effects issues

- Are there regional differences in the occurrence and seriousness of consumer problems?
- To what extent are these regional differences significant?
- Who actually benefits from the component's activities (society at large, special groups, low, middle or high income, well-educated or uneducated, traders, consumers, politicians, etc.)? Can regional differences be identified?
- Are consumer organizations aware of any negative impacts/effects the components may cause to the consumer in general?

ii) Achievement of objectives issues

- In which areas is it possible to encounter overlap or duplication in the activities performed by other CCAC's components, other Federal departments, and the provinces as regards the consumer protection against product misrepresentations?
- How do consumers consider the component's activities?

- Were consumers actually protected against product misrepresentation through the development of standards/ regulations by the component? Under which conditions?
- Was the information provided through the component's activities used to facilitate consumer choices and differentiation among products?
- What would have happened if some products/commodities had not been regulated?

iv) Alternatives issues

- Are there other activities which could be considered as alternative means of delivering the component's outputs?
- What are the informational market failures that the component's activities are designed to correct? What are the reasons for the existence of these informational market failures?
- Would the alternative corrective actions previously identified, be relevant for the correction of specific informational market failures which the component is expected to solve?
- Under what circumstances would the alternative corrective actions be more appropriate?

B) Consultations with Trader/Industry Associations

i) Rationale issues

- Are the consumer products/commodities subject to the component's activities part of Canadian consumer markets

where informational market failures can be expected to occur or already exist?

- Are there areas of consumer markets not now subject to the component's activities, which should be considered?
- Are the existing government interventions as depicted by the component's activities addressing the type of informational market failures identified in Canadian consumer markets?
- Are government interventions inhibiting and/or preventing market forces from exercising their role in redressing the situation?
- What is the most appropriate or optimal level of intervention?
- Does this optimal level change over time?
- Is it possible to "tailor" the level of intervention to specific consumer products/commodities and/or services sectors?
- Is it possible to distinguish essential, beneficial and cost/effective levels of intervention?
- What are the key factors/variables affecting the costs and benefits of different levels of intervention?
- Are present environmental, economic, social, behavioural or other conditions different from those prevailing at the time all or part of the component's activities were introduced?

- If socio-economic environmental conditions have changed, would the changes justify a re-orientation or change in the rationale for the component?
- Given the current socio-economic environment, are the goods and commodities affected by the component's activities the right ones? Should the list be contracted or expanded?
- To what extent would market forces be expected to correct all or part of consumer information problems (given present socio-economics conditions and sellers' code of ethics)?
- Are consumers aware of the utility of the information provided through the regulations/standards developed by the component?
- Which means/remedies could be considered when studying the most appropriate way to respond to consumer informational market failures?
- In the absence of regulations, would traders be motivated to supply the type of information mandated by the regulations? If yes, how much would they provide? For which specific products/commodities?

ii) Impacts and effects issues

- Given the component's activities and outputs, what are the unintended impacts/effects that could result from the component?

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- What effects do regulations and standards have on the efficiency, orderliness and economy in particular sectors of the marketplace?
- Is it possible for regulations/standards to favour market inefficiencies such as increases in costs/prices and decreases in competition? Under which conditions would these occur?
- How are regulations/standards affecting the capability of Canadian producers to compete domestically? Internationally?
- Is it possible to determine the magnitude of these potential unintended effects? How would these be measured? What is the magnitude?
- Is it possible to change the magnitude/extent of negative impacts/effects without negatively affecting the benefits? How would it be possible?
- To what extent is it possible to reflect regional differences in proposals for corrective actions?
- How are traders affected by the provision of standards/regulations? Do traders favour mandatory standards as opposed to voluntary ones? Why?
- Are regulations/standards unfair to smaller traders? Can these be considered as barriers to entry in some industries? Which ones?
- Can regional differences be identified regarding the manner in which regulations/standards are affecting traders in general? In particular industries?

- Which industries are more affected by the legislation and regulations? What is the economic structure of these particular industries? Which variables are influencing the purchaser's decision-making process within these affected industries?
- How are regulations/standards affecting importers? Exporters? To what extent are regulations/standards affecting the performance of Canadian producers abroad? Which ones are more affected?
- To what extent are Canadian consumers affected by the impacts/effects the regulations/standards have on the level of imported goods/commodities? On their prices?
- What are the quantifiable benefits resulting from the component's activities? What is the level of these quantifiable benefits?
- What are the non-quantifiable benefits? How can these be assessed?
- What are the costs of these impacts/effects?
- Is it possible to determine some undesirable impacts/effects?
- To what extent is it possible to reduce or eliminate these and at the same time reduce costs without affecting the level of benefits?
- To what extent is it possible to increase the net benefits?

iii) Achievement of objectives issues

- In which areas is it possible to encounter overlap or duplication in the activities performed by other CCAC's components, other Federal departments, and the provinces as regards the consumer protection against product misrepresentation?
- What would be the net benefits of eliminating or reducing overlap or duplication if it exists? Would it be beneficial to integrate all CCAC's and other federal departments' activities dealing with consumer protection?
- Where no formalized delineation has been established, would it be beneficial to formally delineate the role of each program responsible for part of the attainment of the component's objectives?
- In general, are standards developed by international standard writing organizations more or less restrictive than Canadian standards and/or proposals? Which ones are more restrictive, which ones are less restrictive? Why? Are some conflicting with Canadian ones? Which ones and why?
- What would have happened if some products/commodities had not been regulated?

iv) Alternatives issues

- What are the various alternatives that could be considered when attempting to solve a particular consumer problem?

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- In general, what are the advantages/disadvantages of the various alternatives that have been identified?
- What are the informational market failures that the component's activities are designed to correct? What are the reasons for the existence of these informational market failures?
- Would the alternative corrective actions previously identified, be relevant for the correction of specific informational market failures which the component is expected to solve?
- Under what circumstances would the alternative corrective actions be more appropriate?
- For which products/commodities and/or services are alternative corrective actions more applicable? What are the variables, factors affecting the extent of applicability of alternatives?
- To what extent is each alternative under consideration incentive compatible with market incentives? For which products/commodities and/or services would this principle be more important? To what extent would the non-respect of this principle affect the effectiveness of the alternative? Which conditions/factors favour the attainment of this principle?
- To what extent is each alternative under consideration flexible enough to induce the future behaviour of economic agents? For which particular products/services would it be important to satisfy this principle? To what

extent, would the non-satisfaction of this principle affect the effectiveness of the alternative in question? Which conditions/factors favour the satisfaction of this principle?

- What are the costs (public and private) associated with the implementation of each alternative? How can these costs be estimated? Are there variables/factors influencing the magnitude of these costs? Are there hidden cost that cannot be estimated? Are there variable costs subject to changes over time? Are there regional differences in the costs of each alternative?
- What are the benefits to be derived from each alternative? Can these be estimated and how? Are there intangible benefits which cannot be measured? What are they? Are the benefits changing over time? What are the variables/factors affecting the magnitude of the benefits?
- For which alternatives do benefits outweigh the cost? Is this the case for the existing corrective actions?
- What factors other than cost-effectiveness measures can be used to assess a) the effectiveness of each alternative and b) its desirability from a social point of view?

VII. Impact Analysis

A) Specific Sets of Regulations

As regards the study of specific sets of regulations, the impact analysis methodology would address this following type of potential evaluation questions:

i) Impacts and effects issues

- Who benefits from the regulations? Are there regional differences in the distribution of the target populations? To what extent are target groups affected by the regulations?
- What is the magnitude of the value of goods and commodities subject to these regulations? Has the value of goods and commodities changed over time? To what extent has it changed?
- What is the economic value of the benefits consumers derive from the regulations under study? In particular, what is the value of the reduction in information gathering costs?
- What is the value of the regulatory activity for those being regulated? What is the value of possible non-tariff trade protection that could result from the Traded Goods regulations?
- To what extent do other interested parties benefit from the regulations?
- What are the costs of the regulations being analysed? Who bears the costs of these regulations? Are the prices of consumer products affected by the regulations? What is the value of the changes in prices?

B) Cost Effectiveness of Alternatives

As mentioned previously, it would be very productive to use the impact analysis methodology to assess the effectiveness of each alternative that could be considered to meet the regulations' objectives. Examples of evaluation questions that could be addressed in this particular case are the following:

i) Alternatives issues

- What are the costs (public and private) associated with the implementation of each alternative? How can these costs be estimated? Are there variables/factors influencing the magnitude of these costs? Are there hidden costs that cannot be estimated? Are there variable costs subject to changes over time? Are there regional differences in the costs of each alternative?
- What are the benefits to be derived from each alternative? Can these be estimated and how? Are there intangible benefits which cannot be measured? Are the benefits changing over time? What are the variables/factors affecting the magnitude of the benefits?
- For which alternatives do benefits outweigh the costs? Is this the case for the existing corrective actions?
- What factors other than cost-effectiveness measures can be used to assess a) the effectiveness of each alternative and b) its desirability from a social point of view?

- Are government interventions inhibiting and/or preventing market forces from exercising their role in redressing the situation?
- Is the type of information provided by the regulations/standards administered by the component related to known consumer information needs?
- Is it possible to distinguish essential, beneficial and cost/effective levels of intervention?
- If socio-economic environmental conditions have changed, would the changes justify a re-orientation or change in the rationale for the component?
- Given the current socio-economic environment, are the goods and commodities affected by the component's activities the right ones? Should the list be contracted or expanded?
- Which means, remedies could be considered when studying the most appropriate way to respond to consumer informational market failures?
- In the absence of regulations, would traders be motivated to supply the type of information mandated by the regulations? If yes, how much would they provide? For which specific products/commodities?
- Would these means/remedies generate outputs similar to the ones derived from the component's activities? What type of outputs could be expected from these remedies?

- What is the opportunity cost to society of these regulations? What is the value of the reduction in product diversity resulting from the implementation of the regulations?
- In the case of each party affected by the regulations, is it possible to determine the cost/benefit ratio or the value of net benefit?
- To what extent and how can the costs and benefits of the unintended impacts and effects affect the effectiveness of the regulations?

ii) Type and level of standardization desired

- What was the structure of the industry affected by the standards prior to their implementation? What is the actual structure of the industry?
- If the structure of the industry has changed, to what extent is the changes due to the implementation of standards?
- What was the price structure of the markets affected by the standards prior to their imposition? What is it now? To what extent have standards impacted on the price structure?
- To what extent has the implementation of standards resulted in a reduction of products available within the economic sector affected by them?
- What is the value of the benefits derived from the standards imposed by the regulations? Who benefits from them?

- What are the costs of these standards? Who is supporting these costs?
- How would a change in the level or type of standardization affect both the costs and benefits expected from the standards?
- Is there a minimum level of standardization necessary for specific products/commodities markets to function effectively? Are present regulations ensuring that this minimum level is attained?

VIII. Jurisdiction/mandate

The type of evaluation questions that could be addressed within this methodology can be stated as follows:

- What are the objectives (both formal and informal) of the regulations under study? Are these clearly defined? Would the informal objectives be more appropriate?
- Did socio-economic conditions change since the introduction of the regulations? If yes, in what respect did they change? To what extent do these changes affect the relevance of the regulations?
- Have other similar programs/regulations (federal and/or provincial) been implemented since the introduction of these regulations? To what extent do these overlap or duplicate the regulations being studied? Are the objectives for these programs/regulations similar to the ones pertaining to the regulations in question?

- What are the impacts and effects resulting from the regulations?
- Did the impacts and effects contribute to the achievement of the objectives of the regulations?
- Are unintended impacts and effects counteracting or re-enforcing the intended ones? To what extent?
- Are there alternatives to achieve the objectives of the regulations and/or improve the effectiveness of the existing regulations?

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