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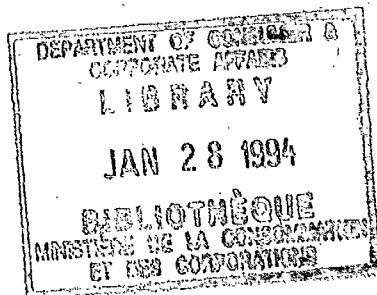
RESEARCH REPORT ON:

EVALUATION OF REGULATIONS AND
PROGRAMS AFFECTING THE TEXTILE
SECTOR

JUNE 1987

PREPARED FOR:

CORPORATE SERVICES & RESEARCH
BRANCH
CONSUMER & CORPORATE AFFAIRS
CANADA



PREPARED BY:

CANADA MARKET RESEARCH LTD.

CMR#2736

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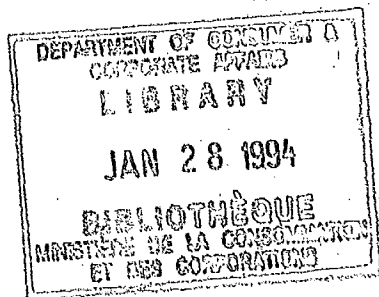
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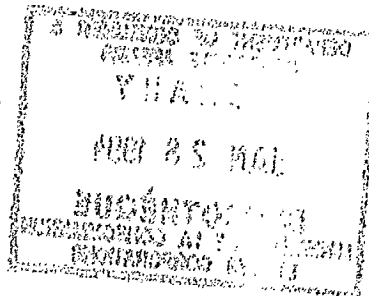


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i. EXECUTIVE SUMMARY

The report examines the role of Consumer & Corporate Affairs Program activity in the Textile Sector. It looks at the rationale for Government intervention in the marketplace and considers the need for, achievements of, and alternatives to the set of Textile Programs and regulations for which CCAC is responsible.

The report reviews and evaluates published material relating to program objectives and performance. The aim of the report is to assess this material to help determine the most effective program presence for CCAC in the market and to assess ways in which CCAC can increase the extent to which it meets this objective.

The report deals with three textile programs - the Textile Labelling & Advertising Regulations, the Care Labelling Program, and the Canada Standard Size (CCS) Program. Background information is presented on each of these programs. This precedes a detailed review of the need for program information, the extent to which this information is having a beneficial effect, and whether alternative mechanisms are capable of providing the necessary information.

A series of recommendations summarizing the major points about the current standing of each program is contained in a separate section.

In relation to the Textile Labelling & Advertising Regulations, the report concludes that the mandatory nature of the Program is needed to deliver vital consumer information on Fibre Content and Dealer Identity. The first is particularly important to the

consumer from a number of decision standpoints, but the second is of questionable consumer benefit when presented in the form of CA numbers. There is a recommendation in favour of greater CCAC enforcement of these regulations with regard to imports. On the issue of Country of Origin information, recommendations call for a review of administrative procedures to ensure greater consistency and less overlap between CCAC and Revenue Canada Customs & Excise. In general, the need for program improvements to the Textile Labelling and Advertising Regulations is relatively small. The importance of the information and its orderly and consistent provision are such that the beneficial effects of the program should not be entrusted to market forces.

The Care Labelling Program in Canada is voluntary, and the report concludes there should not be a move to mandatory care labels. There are problems of consumer comprehension under the current Canadian System similar to those with care systems in other countries. The use of supplementary wording to give added meaning to symbols is widespread in Europe, but there is no evidence to suggest that the I.S.O. Care Labelling scheme reduces consumer misunderstanding of care symbols. Recommendations are in favour of greater program publicity to help educate Canadian consumers, and that detergent and appliance manufacturers should be encouraged to participate in this. Opportunities exist to extend the Care Labelling system to other textile items and to include other care symbols but there is no strong consumer case in support of this.

The report concludes that there is a good fit between the size standards of the CSS Program and types of size problems which consumers experience. A full set of standards is not fully operational in the market-place and as a result, it is too early to make judgments about the potential contribution of the program. Consumer awareness and understanding of the CSS label

is relatively low but this may be due to industry's resistance to size standards and its low program compliance in certain areas. The report recommends CCAC should review ways to encourage greater participation from industry while at the same time address ways to improve the visibility and meaning of the CSS label. A full set of size standards will shortly be in place, but market mechanisms will need to be orchestrated more successfully by CCAC if size standards are to receive enough attention in the market for consumers to bring pressure to bear on manufacturers.

1. INTRODUCTION

1.1 Objective of Report

The purpose of the report is to examine the rationale for, and the effects of Consumer Products Legislation administered by Consumer and Corporate Affairs Canada (CCAC) in the Textile sector. The report looks at existing textile programs for which CCAC is responsible, the extent to which they are working, and whether further provision could increase their effectiveness. But the report also looks at the market's responsibility to resolve problems and considers the extent to which the failure of market mechanisms places consumers in a situation which warrants intervention by CCAC on their behalf.

The report is therefore as much an interrogation of the market as it is an evaluation of CCAC's program performance. This market interrogation is carried out with reference to the two major aims of the Traded Goods component; i.e. to what extent is the consumer deprived of information needed to make sound buying decisions, and to what extent is the consumer exposed to the risk of fraud and misrepresentation.

1.2. Program Description

The report is concerned with three major Consumer Products programs affecting the textile area:

a) Textile Labelling & Advertising Regulations, which include...

- Fibre Content Information
- Dealer Identity/C.A. Number

b) Care Labelling Program

c) Canada Standard Size Program

Brief descriptions of these programs are given in the main body of the report and further information is provided in the Annex.

1.3. Outline of Report

Section 2 provides a short note on methodology. Section 3 considers the rationale for Government intervention, presents background material on each of the major textile programs, and looks at the program situation in other countries.

Section 4 looks in detail at the Textile Labelling Program and discusses Fibre content and dealer identity information. It also considers the issue of country of origin information and CCAC's role versus Revenue Canada Customs and Excise in this area. Section 5 deals with the Care Labelling Program and addresses the issue of consumer comprehension with reference to Canada and to care labelling systems in other countries. Section 6 examines the Canada Standard Size System (CSS) and reviews the complex market situation in which this program operates.

Throughout the detailed sections of 4-6, the discussion is organised as far as possible under standard headings which examine the need for each of the programs, their achievements, and possible program alternatives for future consideration.

Section 7 pulls together a series of recommendations summarizing the major observations and conclusions relating to each of the three major textile programs.

2. METHODOLOGY

The findings and conclusions presented in the report are derived from a thorough examination of a wide range of evaluation studies that have examined various aspects of programs and regulations in the textile area. The pieces of evidence, or study modules, are fully documented in the detailed bibliography of references included in the Annex.

Study modules can be grouped into a number of categories according to subject coverage or sponsoring body. One possible categorisation is as follows:

- Program review material compiled by CCAC
- CCAC commissioned studies gathering reaction to programs from producers and consumers
- documents on regulatory requirements and program compliance procedures
- independent studies and consumer articles on various aspects of program operation and effectiveness
- CCAC & other commissioned studies looking at program performance in other countries

The report aims to check the internal consistency of the available evidence; to evaluate its implications in terms of the need for action; and to assess its significance for CCAC in terms of future program development.

3. BACKGROUND TO TEXTILE PROGRAMS

3.1 Basis for Government Regulation

Research suggests that there are three conditions needed to justify Government regulation:

- informational deficiency
- a failure by the market to correct this
- a cost-effective role for Government

Informational deficiencies can be anything which prevents consumers from having access to the information they require to make sound buying decisions, or which exposes them to health or safety hazards, or to the risk of fraud, or misrepresentation. For Government to address this, there must be a failure by the market to correct the situation; i.e., consumers are not able to achieve a change in market behaviour through selective allocation of their buying power; no independent third parties exist to provide 'objective' information; and forms of legal redress are not adequate to affect the desired change.

At this point, there may be a case for Government intervention if this can be justified on the grounds of cost-effective involvement. Costs to be taken into account include:

- costs of compliance on producers
- costs to Government of enforcement
- costs to buyers and sellers of unintended side effects

Potential side effects have to be weighed carefully by Government in the event that regulation has an adverse effect on competition, innovation, and international movement of goods resulting in restricted choice, lower quality, or higher prices to the consumer.

The three major issues for Government to determine can be summarised as follows.....

- what is the extent of the 'damage' caused to consumers by informational deficiencies
- what is the likelihood that the market can, and will resolve the situation
- can Government involvement be cost-effective and will it result in a net benefit to consumers

Government has two mechanisms through which to achieve an effect in the market and an additional control on this effect according to the extent to which compliance is required. These options are: a) information strategies b) provision of standards - with the additional control being whether these are made mandatory or left voluntary. For example, the provision of fibre content and dealer identity information is mandatory under the Textile Labelling Act. Alternatively, the Canada Standard Size System (CSS) is voluntary, although there are specific procedures governing the use of the CSS trade mark by those who choose to comply with the system.

Government must decide a number of issues when selecting mechanisms through which to achieve effects. For example, standards are costly to develop, involve considerable resources to administer, and can affect the range and variety of products

ultimately available to the consumer. In comparison, information strategies tend to have a less restrictive effect, deliver information at the point of sale, and development costs fall on those who ultimately benefit from them.

Taking into consideration the various conditions necessary for Government intervention, it is possible to draw up a series of guidelines on what CCAC's role should, and should not be. For example, it is not Government's role to "wet-nurse" consumers by relieving them of all buying responsibility. It is not Government's role to provide information when consumers have adequate means at their disposal to check out products for themselves. It is not Government's role to provide information which can be judged as 'nice to know' rather than 'need to know'. It is not Government's role to provide information when it is in the market's best interests for producers to meet the information need themselves.

It is Government's role to become involved if the market fails to provide the 'right' information or 'enough' information to consumers, or if the market provides information which is too complex or potentially misleading. It is Government's role to see that its presence in the market on behalf of consumers is cost effective. This means assessing the need for Government to become more involved, but it also means making sure that Government's existing presence is warranted, and that alternative ways of achieving the desired effect are not available. It is Government's responsibility to consider the need to become directly involved according to whether the same effect could be achieved indirectly by bringing pressure to bear on producers, or by providing channels through which consumers can exert pressure on producers.

All of this recognizes that there is a limit to the extent to which Government can, and should intervene on behalf of consumers. For CCAC to fulfill its mandate, it must restrict its market involvement to optimal effect while at the same time allowing competition and innovation to flourish in the consumers' best interests.

3.2 Details of Textile Regulations

This section provides background information on each of the major textile programs, and serves as useful reference material for the detailed program discussions in Sections 4-6.

3.2.1 Textile Labelling and Advertising Regulations

The Textile Labelling Act is 'an act respecting the labelling, sale, importation and advertising of consumer textile articles'. Introduced in 1972, the act is the sole responsibility of CCAC. The regulations ensure information is provided to consumers on fibre content and dealer identity. Regulations also safeguard the consumer by prohibiting false or misleading representations in labelling or advertising. Specifically, labels are required to:

- give the name of each fibre comprising more than 5% by weight of the item
- give the percentage of each textile fibre as a proportion of total fibre weight of the item
- give the identity of the company by, or for whom the article was manufactured either in the form of the dealer's name and address or through a dealer identity (CA) number

The Act also contains a number of other requirements (see Annex) covering how the label must be attached and displayed. These provisions ensure the information is available to consumers at the point of sale and during product use and that it is legible and durable throughout the life of the item. Regulations also restrict items which do not provide this information from being made available to consumers.

The Textile Labelling Act does not require that country of origin be disclosed in either labelling or advertising unless the item is imported. The Marking of Imported Goods Order, administered by Revenue Canada Customs and Excise identifies those goods including wearing apparel plus some household textile items that must be marked with country of origin when imported into Canada.

At present, Country of Origin requirements are under review and certain changes in administrative procedures are being considered for CA numbers.

3.2.2 Care Labelling Program

The Care Labelling Program is the sole responsibility of CCAC and is a voluntary system. All manufacturers or dealers of consumer textile articles are free to use the care labelling system as long as they comply with the Government standard covering the provision of care information. There are no restrictions on the sale, importation, or advertisement of textile articles which do not have care labels. The voluntary nature of the program is intended to help ensure the consistent provision of the information, while at the same time not restricting the range of goods available to consumers through imports. It is designed to operate in a free market situation in which manufacturers who choose to comply with the program can gain appropriate advantage in the market.

Under the Standard for Care Labelling of Textiles introduced in 1970, care information must ensure restoration of the textile item to 'an acceptable, usable condition'. Care information disclosing proper methods of cleaning and laundering must be in accordance with a system of 'appropriate symbols in prescribed colours'. The system specifies five basic care symbols and

three colours to denote recommended or safe cleaning procedures. The five symbols are a wash tub for washing, a triangle for bleaching, a square for drying, an iron for pressing, and a circle for dry cleaning. The three colours are red, amber, and green, together carrying a traffic light connotation to help denote their meaning. Care labels are designated as CCAC trade marks under the Trade Mark Act.

Among considerations in this program area are possible ways to improve consumer comprehension of the system and the need to extend the program by introducing symbols for other care procedures.

3.2.3 Canada Standard Size Program

The Canada Standard Size (CSS) Program is concerned with the standardization of sizes and size labelling of wearing apparel in Canada. CCAC is solely responsible for the program under the National Trade Mark Garment Sizing Regulations introduced in 1961. These regulations outline the requirements for the application of the Canada Standard labelling trademark. The CSS Program is a voluntary system.

The development of standards under the program has been in two areas related to consumer problems with clothing sizes. One is to develop a system of body standards for various groups of the population in Canada. The other is to develop a system of garment standards related to these body standards, and is designed to help manufacturers adopt consistent sizing approaches. To date the CSS program has introduced body standards for children's, infants', and women's clothing and a limited number of dimensional standards have been developed for infants' and women's clothing. There are no plans to develop

either body or dimensional standards for items of men's clothing.

The development of standards is the responsibility of two CGSB committees - Standards Committee on Garment Sizes for Children & Infants, and Standards Committee on Garment Sizes for Women. CCAC contributes to the standards development process through its funding, and membership of CGSB standard size committees.

The objective of the CSS program is to reduce frustration to the consumer in the form of 'unnecessary try-ons', and to reduce the number of garment returns because of poor fit. It is also to assist consumers buying garments on behalf of others and to facilitate telephone and mail order catalogue buying. Further, it is to provide benefit to industry both in the form of protection to retailers when buying from suppliers, and to manufacturers when selling abroad.

CCAC has undertaken reviews to assess the extent to which the CSS Program is helping to reduce consumer problems and whether changes to the CSS label would help improve program effectiveness.

3.2.4 Overview of Textile Programs

Exhibit 1 which follows presents summary points of each textile program and highlights the level of compliance behind the various program requirements.

EXHIBIT 1: OVERVIEW OF TEXTILE PROGRAMS AND REGULATIONS

PROGRAM	VOLUNTARY	MANDATORY
. Textile Labelling & Advertising Regulations:		
- Fibre Content		Generic name & percentage composition of fibres comprising more than 5% by weight
- Dealer Identity		Dealer Name & Address or Identification (CA) Number
- Country of Origin		Imported Textile items
. Care Labelling Program:	Compliance with National Standard of Canada system of symbols & colours	
. Canada Standard Size Program:	Compliance with National Trade Mark Garment Sizing Regulations Use of CSS symbol/logo	

3.3 International Comparisons

This section briefly reviews programs and regulations in other countries - mainly U.S. and U.K. - within the textile area. Comparisons help to show approaches adopted and problems encountered and provide indications of possible further provision within Canada.

3.3.1 Textile Labelling and Advertising Regulations

Like Canada, both the U.S. and the U.K. operate mandatory systems of textile labelling. For example, in the U.S. the appropriate statutes are the Wool Products Labelling Act and the Textile Product Identification Act. Together these acts are virtually the same as the Canadian Textile Labelling Act. Similarly in the U.K., where provision is contained under EEC Directive 71/307. A point of difference concerns the labelling of fur products. In the U.S. this is required under the Fur Products Labelling Act. In Canada however, the Fur Garment Labelling Regulations to the National Trademark and True Labelling Act provide for only the voluntary labelling of fur products

Minor differences exist on the presentation of dealer identity information in other countries. For example, in the U.S., similar information is required in the form of registration numbers. In the U.K. however, there appears to be restricted opportunity for this information to be provided in the form of identification numbers.

3.3.2 Care Labelling Program

Unlike Canada, care labelling in the U.S. is mandatory under the Permanent Care Labelling Rule. The U.K. situation is similar to Canada with voluntary provision under the I.S.O. system. Provision under the U.K. system is more comprehensive than in Canada with washing information provided in the form of temperature settings and related to wash cycles of machines. In addition, support for care label information tends to have received wider support from detergent and appliance manufacturers in Europe than in Canada. Other countries in Europe operate voluntary care labelling schemes, many based on the Ginetex system, although many national care labelling bodies choose to supplement information in the form of symbols with worded instructions to help improve consumer comprehension.

3.3.3 Standard Size Program

Up until around five years ago, the U.S. operated a standard size program similar in principle to the current CSS Program in Canada. This system has since been abandoned, although it appears a new standard sizing program is currently under development. There is little evidence of the detailed circumstances behind this, although it would seem that withdrawal of the U.S. sizing program was because of concerns about the reliability of the base population data and questionable application of this data in developing the size standards.

I.S.O. committees on sizing exist in other countries but study modules fail to provide any references to standard size programs within the U.K.; although, it is noted that major European retailers are more active than retailers in Canada on the development of their own size standards. A major factor in the

apparent lack of Government involvement in this area may be adverse effects on EEC import and export trade movements which could potentially result from the imposition of standards.

3.3.4 Overall Review of International Situation

On balance, there tend to be many more points of similarity than difference between Canada and other countries in the textile program area. Points of similarity include textile programs currently in place but also include the direction of program development and a number of factors surrounding these programs. For example, the mandatory textile labelling program in Canada is paralleled in both the U.S. and the U.K. Similarly, the difficulty of developing the standard size program in Canada is mirrored in the U.S. where a major reconsideration of sizing approaches is currently taking place.

In the U.S., pressure from consumer groups has played a part in Government's decision to adopt a mandatory care labelling system. In Canada, similar pressure exists from consumer groups although it has yet to achieve the same results. Europe does not favour mandatory approaches and has had difficulties with consumer comprehension of programs similar to Canada. Many European countries have found it necessary to supplement and individualize their care programs with additional worded instructions and Canada has given some thought to adopting a similar strategy.

4. TEXTILE LABELLING PROGRAM

4.1 Need for Program

All the evidence suggests there is a continuing, and if anything an increasing need for the Textile Labelling and Advertising Regulations. Consumer groups and textile manufacturers pinpoint a number of reasons why the current regulations should remain in place:

- growth in the use of blended textile fibres by industry
- introduction of new blends of fibre
- increased imports, some containing a high proportion of unknown fibres
- new fabric finishes, for example in upholstered furniture giving rise to concern over allergenic properties and flammability of material
- increased use of trade names
- greater consumer concern to know comfort afforded by different textile fabrics

To some extent it is natural that consumer groups and textile manufacturers should identify factors intensifying the need for program information. For example, consumer groups tend to argue that 'more' is better, and manufacturers can be expected to show concern for information which Canadian producers are better placed to provide than foreign manufacturers. Nevertheless, it is precisely the introduction of man-made, and blended textile fibres, together with increased use of trade names, which

prompted the 1971 replacement of previous provisions under the Textile Materials Marking Regulations and the Hosiery Marking Regulations within the current Textile Labelling Act. On these grounds, there is no basis on which to argue that information provided under the program is not needed. In addition, there is no basis on which to argue that the provision of the information should be turned over to market forces. Compliance rates tend to suggest that Canadian manufacturers would continue to provide textile labelling information but that consumers could be exposed to unacceptable decision risk and potential fraud on imported items. In addition, there is considerable evidence that consumers use fibre content information when buying textile articles and that this often represents useful information on how to take care of items. (See also Section 4.2.)

CCAC evidence shows compliance with textile labelling information requirements from domestic manufacturers is high at around 80-90%, and that compliance on imports is generally around 60%. These levels are very much in line with industry estimates and tend to suggest that arguments in favour of more extensive CCAC enforcement of the regulations with regard to imports are valid. (The issue of increased fibre content testing of imports has been included in a recent set of program initiatives drawn up by CCAC.)

4.2 Use of Textile Labelling Information

There is a wide body of evidence to indicate that consumers use fibre content information. In a recent study conducted in Canada, the Consumer Products Consumer Survey carried out on behalf of CCAC concluded that as many as nine out of every ten consumers claim to look at fibre content information when buying clothes.

Evidence from the Canadian Home Economics Association also concluded that fibre content information is useful and valuable to consumers. In Britain, the National Consumer Council found that 75% of consumers said fibre content is a factor influencing clothing decisions.

Studies have also concluded that fibre content information meets a variety of consumer decision needs. For example, the Consumer Products Consumer Study found that consumers use the information to assess durability of the item, ease of care, quality, and so on. In addition to benefits to consumers, apparel manufacturers interviewed indicate that they regard the information to be of benefit to industry and fully two thirds of trade representatives feel that the information helps protect retailers against misrepresentation from suppliers.

In the area of CA numbers, evidence from large scale CCAC research indicates only one in four consumers are aware of them, only 3% know what they mean, and only 1% have ever used them when making a complaint. Whatever the trade advantages of CA numbers, the benefit to consumers of dealer information in this form is extremely limited.

4.3. Changes to Program Information

4.3.1. Extension of Textile Labelling Regulations to Other Textile Items

There is no clear indication from the evidence on whether textile labelling information should be extended to other textile items such as carpets, towels, upholstered furniture etc. The Consumer Products Consumer Study found that around three in four consumers feel fibre content information is important when buying these items, but it is likely that this

represents a certain amount of overclaiming. In addition, information on these textile items is being made available to consumers in the form of Buying Guides provided by consumer action groups, and industry is also providing fibre content information under a voluntary disclosure system. On this basis, the need for Government to step in and legislate extended coverage of the regulations to other textile items seems unnecessary.

On piece goods, which are covered under the existing regulations, there appears to be some concern about the level of compliance particularly on imported fabric. In addition, consumer groups highlight some concern over acceptable use, and relevance of labelling terms of piece goods - for example, the use of the term 'unknown fibres'. But, in connection with a specific case cited in the Canadian Consumer, it is important to note that the consumer body's view was one of 'buyer beware'. Under the conditions for Government involvement, it would seem that this is a case where CCAC is not obliged to step in to protect the consumer from a 'bargain' shopping approach when there is at least some knowledge of the risk involved.

4.3.2. Dealer Identity (CA) Numbers

The major issue is the extent to which dealer identity information in the form of numbers is used, and by whom. For example, most industry groups and associations agree that the information is used by the trade. However, their reservations about the relevance of CA Numbers to consumers is confirmed by recent evidence which found that virtually no consumers use the information. In the light of this, there has to be some consideration given to whether CA numbers are an acceptable consumer substitute for the dealer's name and address. Dealer

identity numbers can be justified from the trade's point of view but not from the consumer's point of view if this deprives the consumer of knowing the manufacturer's or importer's name and address since too few consumers know about CCAC's role in this area.

But before deciding whether Government should take action on this, there are other factors to be considered. For example, it may be assumed that only a minority of consumers are likely to have a complaint warranting use of the dealer information. Of these, some will not feel sufficiently incensed to take action. Among those who do, the majority will approach the retailer. At this point the CA number is highly relevant to the retailer to help track down the source of supply. Thus, while consumers may be prevented from taking direct action on their own behalf, in the normal course of events consumers still receive the benefit of the information. In addition, it is known that manufacturers are strongly against providing their full name and address given the labelling cost implications, which are further compounded by bilingual requirements. Given this situation, the extent of real, rather than potential consumer disadvantage from CA Numbers has to be weighed carefully by Government. For example, any Government attempts to insist on the labelling provision of dealer name and address could be met by action from the trade which simply passes the higher labelling costs on to consumers in the form of higher prices. If so, it is the consumer who is effectively paying for information which may be of only occasional benefit to a small minority.

4.3.3 Country of Origin

CCAC is currently considering a review of Country of Origin labelling requirements to assess the need to extend existing regulations and to achieve greater consistency between the two pieces of federal legislation in this area.

One potential measure under review is the requirement of 'Made in Canada' declarations. Evidence from the U.K., presented at a 1984 OECD symposium suggested that consumers are only interested in Country of Origin information because of different quality connotations associated with goods from certain foreign countries. The research points out that consumer need for the information to help buy from domestic manufacturers is low and that this is reflected by the limited success of 'Buy British' and 'Achetez Francais' campaigns. The report goes on to say that mandatory provision in the U.K., similar to that under review in Canada, is more a case of consumer protectionism - designed to protect domestic manufacturers from overseas competition - than consumer protection.

The OECD conclusions were based in part on the finding from a National Consumers Council study which showed only 21% of U.K. consumers stated 'country where made' to be a factor in their clothing decisions. The Consumer Products Consumer study found that among Canadian consumers the figure is almost identical at 26%. The conclusion from this and European evidence is that while there may be political and economic benefits for 'Made in Canada' declarations, consumer benefits are a potentially weak basis on which to argue in favour of the information.

Another potential measure under review in Canada is the requirement of Country of Origin declarations for textile inputs as well as for end products. (e.g. the use of a term such as 'Made in Canada' of imported fabric) There is no evidence to suggest consumers need this information or are currently being misled by its absence under the existing regulations. The OECD evidence tends to imply the majority of Canadian consumers would not be drawn to the 'Made in Canada' part of the labelling information, and that a statement such as 'of imported fabric' would not help consumers make judgements about quality of item

based on country of origin any more than under existing information provision. This is not to deny that some consumers would prefer to buy products made by Canadian manufacturers, whether of imported fabric or not, but there seems adequate provision for Canadian textile manufacturers to draw this to the market's attention under existing Country of Origin regulations.

There is some need for greater consistency between different pieces of federal legislation on Country of Origin labelling, and the way these are enforced by CCAC and Revenue Canada Customs and Excise. Under CCAC regulations, all imported textiles must show Country of Origin but under Revenue Canada regulations this is only required on certain items. In addition, both bodies differ somewhat on definition of country and on the extent to which a city is an acceptable indication of country of origin. These issues are compounding a problem of adequate enforcement in relation to which Revenue Canada Customs and Excise freely admits that a number of textile imports into Canada are not in compliance with existing labelling requirements.

4.3.4 Overall Review

On balance, the Textile Labelling and Advertising Regulations represent a benefit to the consumer and there is little guarantee that this benefit would prevail if responsibility to provide the necessary information were handed over to market forces. In general industry, and other interest groups, feel CCAC has kept up with new developments in the marketplace. Some concerns suggest the need for stricter CCAC enforcement of regulations on imports although revisions to existing legislation in this area do not appear to be warranted from the consumer point of view. There is no evidence to suggest current regulations constitute a barrier to imports and much of this may be due to the existence of similar textile labelling provisions in other countries such as the U.S. and the U.K.

There is some concern about potential overlap and inconsistency on Country of Origin regulations between CCAC and Revenue Canada Customs and Excise.

On specific issues, there is no hard evidence to suggest the regulations should be extended to include other textile items such as carpets although some attention should be given to the issue of whether piece goods, particularly on imported fabrics, are in compliance with requirements.

5. CARE LABELLING PROGRAM

5.1. Need for Program

Despite disagreement between industry and consumer bodies about whether the need for care labelling information has increased, there is a general consensus that the need for the information has not decreased. In particular, consultations with selected associations pinpointed reasons given by retailers, consumer groups, and professional research bodies for the increased information need:

- the development and use of new fibres and more blended fibres by industry
- the increase in textile imports containing a wider variety of fibres and blends
- changes in dyes, detergents, and washing machine design

From the consumer side, there is considerable evidence to indicate that consumers use the information both when buying clothing items and when deciding first time care procedures for newly bought articles. In addition, as noted by consumer groups, care labelling information offers consumers some degree of recourse against professional dry cleaners, many of whom endorse the need for the information and are in favour of it being extended.

Based on the evidence, there is a continuing market need for care label information which offers both direct, and indirect benefit to the consumer. Whether these benefits need to be reinforced through a mandatory care labelling system is open to debate (see section 5.3.1.) but opinion from industry groups and other bodies suggests that current compliance rates are high, at least among domestic textile manufacturers. Associations consulted cite a number of reasons for the high compliance:

- pressure on manufacturers from large retailers and retail chains
- Canadian retailers supplying care labels to importers and foreign manufacturers
- consumer demand for care information
- protection afforded to textile manufacturers

The only evidence of a possible disadvantage to consumers is the practice of low labelling by manufacturers - i.e. specifying overly cautious care procedures in order to protect themselves. There is general agreement that this practice exists both in Canada and throughout Europe but there is some doubt about the extent to which the consumer is penalised by following more costly care procedures than necessary. For example, a 1982 U.K. study found that two thirds of consumers had washed items labelled as dry clean. In over 80% of cases, results had been satisfactory and damage-free, and in only one in ten cases did consumers report shrinkage or colour loss. Although the Consumers Association of Canada warns consumers to experiment at their own risk, it seems many are prepared to do so (especially with regard to dry cleaning instructions) with no apparent drawbacks. On this basis, there are few if any negative effects

of the information and therefore sufficient grounds on which to conclude a net benefit to consumers deriving from the Care Labelling Program. However, the issue of whether the information could be made more beneficial to consumers receives separate discussion (see Section 5.3.2).

5.2. Use of Care Labelling Information

Available evidence shows high levels of consumer support for the information.

For example, recent information from the Consumer Products Consumer Survey conducted on behalf of CCAC found large majority consumer support for the use, and importance of care labelling information. In particular, the study determined that over 80% of consumers use the information either when buying clothes or deciding how to care for them. Similarly, the Canadian Home Economics Association found that nine out of every ten consumers regard 'how to care for clothes' as important either every, or most times they buy clothes. Also, a National Consumer Council study conducted in the U.K. found that 'washing and cleaning' instructions were ranked as the second most important piece of information to consumers when buying clothes.

Canadian Research conducted for CCAC also shows that much of the information value in a care context extends only to the first cleaning occasion - for example, only one in five consumers claim care labelling information is important on subsequent cleaning occasions. The exception is delicate or expensive items where the information is likely to be used as an ongoing source of reference.

All the evidence indicates that, irrespective of the level of consumer comprehension of the current Care Labelling Program, the information is used and perceived to be of value from a number of different decision standpoints.

5.3 Changes to Care Labelling Information

5.3.1. Mandatory Provision

Ever since the introduction of the Care Labelling Program, consumer groups in Canada have been calling for the program to become mandatory. The majority of industry and professional research groups claim to support this view, although there is opposition from laboratory institutions who it could be argued have a more realistic understanding of the practical difficulties of drawing up standards which would be effective and workable. While evidence from consumers also indicates support for a mandatory care labelling system, this support is by no means universal. For example, a 1984 CROP study found two thirds of consumers interested in a mandatory system. But, allowing for overclaiming, this figure is lower than might have been expected, added to which is the fact that only one third of consumers were firmly in support of mandatory care labels.

In general therefore, the mood from the market is in favour of mandatory provision but there are doubts about the full extent of support and the degree to which it reflects real consumer

need. In addition, there are a further set of issues against changing the current voluntary nature of the system. For example...

- compliance under the current program is said to be high
- a mandatory system could have a potentially restrictive effect on imports
- care labelling is not mandatory in Europe
- there are consumer comprehension problems with the current system in Canada

This evidence highlights the possibility of unintended side effects arising from changing the current system, plus it raises some questions about the wisdom of imposing a system on industry which is not fully understood by consumers. There are also doubts about whether program provisions could be stated in a specific or precise manner to be enforceable under law and whether Government's role in this process would be cost effective. On balance, the evidence does not add up to a clear case in favour of a move to a mandatory care labelling program. There is uncertainty about the burdensome effect this could have on industry, uncertainty about possible restrictive effects in the market, and uncertainty about the size of, and need for additional benefits to consumers.

5.3.2. Consumer Comprehension of Care Labelling Information

Industry groups and other professional bodies have expressed doubts about the extent to which consumers understand the current care labelling system. In general, consumer studies tend to support this.

For example, the Consumer Products Consumer Survey highlighted a number of points:

- certain symbols, particularly those relating to drying and cleaning, are not well understood
- many consumers fail to realize the traffic light significance of the colour coding scheme
- women are better informed about the system than men but not by as much as might be expected

These findings confirm similar results from an earlier 1977 study commissioned by CCAC and suggests that efforts during the intervening years have done little to improve consumer comprehension of the program.

However, there is a need to place these findings in context. For example, these and other studies tend to assess consumer comprehension of the symbols in isolation. The fact that the Textile Labelling and Care Labelling Programs are intended to work together suggests that consumer comprehension may be higher in the marketplace where the consumer is able to physically inspect the fabric of the item and look at the fibre content label in order to help derive added meaning from the care label information. Clearly there is a limit to the intrinsic significance of symbols such as a circle or a triangle and consumer studies tend to reflect this. This tendency would also explain why there are not larger differences in comprehension between men and women.

An added reference point is comprehension of care systems in other countries. For example, a major study conducted by the British Standards Institution (BSI) found relatively high levels of misunderstanding of drying and cleaning symbols throughout

many European countries. This situation has led many national care labelling bodies to resort to the use of worded instructions to help give additional meaning to care symbols.

Within Canada, CCAC recognizes the potential for limited consumer comprehension of symbols in the absence of reference material. The Consumers Products Consumer Survey showed that nine out of ten consumers endorse the need for such material, and there is evidence that literature provided by CCAC on care symbols is used by consumers aware of its availability, and results in improved understanding. But a major difference between Europe and Canada is the extent of educational support provided by industry. For example, in the U.K., the BSI study noted that all detergent packs and washing machine brochures carry details of the care system. There is clearly scope for similar levels of support in Canada and there is a strong case that this support would substantially improve consumer comprehension of the system.

5.3.3. International Systems (I.S.O./Ginetex Systems)

Based on the B.S.I. study of other care systems, the current I.S.O. or Ginetex systems in use throughout Europe are not without their drawbacks. Evidence shows many consumers do not understand the 'caution' significance of the underline symbol and many do not understand the temperature significance of the dots used to denote the heat settings of the ironing symbol. In recognition of this and other limitations, many national care labelling bodies have employed the use of wording to impart extra meaning, despite the fact that countries are aware that by doing so they are jeopardizing the 'international' nature of the

international system. In this context, it is worth reproducing Smallbone's statement given at the 1984 OECD Textile Symposium.

"Perhaps the most useful measure that could be adopted in the field of textiles or textile products that would benefit consumers would be standardised care labelling and washing instructions. Attempts to create an international system have failed and consumers' desires for an easily understood system which correlates with symbols used on detergent packets, washing machines, and garments have yet to be fulfilled.."

Within Canada, the Consumer Products Consumer Survey has shown a clear consumer preference in favour of the current Canadian care labelling system over the I.S.O. system. The study found that around ten times as many consumers preferred the colour coded Canadian system over the black and white format of the I.S.O. system. The study also showed a similar level of consumer support for the addition of words to the Canadian system.

This evidence indicates that CCAC should carefully review any attempts to bring care labelling systems in Canada into line with international standards. International systems have a number of failings, and the available evidence tends to suggest a higher intrinsic meaning attached to care labelling symbols as presented under the current system in Canada than under systems abroad. Based on European countries' use of words within their systems, any moves by Canada to follow a similar route would be unlikely to jeopardize the international compatibility of the current Canadian system.

5.3.4. Extensions to Care Labelling Information

There are a number of possible extensions that have been reviewed in the recent past:

- extensions of the program to include other care procedures
- extensions of the program to include other textile items.

The Ontario Research Foundation (ORF) has conducted work on CCAC's behalf looking into the development of a Cold Water Wash Symbol and has made recommendations on the best way to present the information. This symbol exists in Europe under the International Textile Care Labelling Code and the U.S. system employs written statements on labels to convey the information. In Canada, ORF argues in favour of the use of the symbol on the basis that certain fibres may wear longer if the wash temperature is reduced, and that many articles currently labelled as 'dry clean' could become suitable candidates for a cold machine wash cycle. However, there are a number of reasons why this information should be seen as 'nice to know' rather than 'need to know'. For example,

- the Consumer Products Consumer Study found that around one third of consumers did not feel a Cold Water Wash Symbol is needed
- evidence from Europe has found many consumers have experimented successfully with alternative care procedures for items labelled 'dry clean'

The only real basis for introducing a Cold Water Wash Symbol would appear to be the possibility of its greater relevance for new fibres or blended textiles and the extent to which these are

on the increase. From a consumer perspective, the evidence does not point to a strong need for the information.

Other care information which exists in Europe but not in Canada is the use of wash codes which relate to program selector settings on automatic washing machines. In the U.K., this information has been available for a number of years and the U.K. labelling body (HLCC) claims this information works well although is understood by less than 10% of consumers. In Canada, ORF studies have found that wash temperatures of machine settings correlate with wash cycle vigor sometimes to potentially damaging effect. However, there is no evidence from other sources to suggest that this is currently a major problem for Canadian consumers.

The other program extension under consideration is the need to include other textile items such as carpets, drapes, and upholstered furniture within the current system. On this issue, the Consumer Products Consumer Study found relatively high numbers of consumers who felt the information to be necessary but, allowing for overclaiming, these levels do not signify a major consumer need for care label information on other textile items.

5.4. Overall Review

The detailed set of recommendations on the Care Labelling Program are given in section 7. The following pulls together some of the main summary points from the current discussion.

The review suggests that the Care Labelling Program is needed because it provides important consumer information and because there is no guarantee that market forces would deliver this

information in a consistent manner. Despite the importance consumers give to care information, there is not sufficient evidence on which to argue in favour of a mandatory program. The case against mandatory provision is based on potentially restrictive effects on imports, a burden on industry which is disproportionate to the improved benefits this would have for consumers, and certain limitations of the current system in terms of consumer comprehension.

To improve consumer comprehension, the introduction of wording could be adopted without any loss of international compatibility but in particular, industry should be encouraged to provide levels of promotional support for the system similar to that given by manufacturers in other countries.

Despite a number of possible options to extend the current care system in Canada, none appear to be associated with strong consumer need.

6. CANADA STANDARD SIZE PROGRAM

6.1. Need for the Program

6.1.1. Existence of a Problem

A number of studies have found that the large majority of consumers claim to experience difficulty buying clothing that fits properly. Estimates vary from anywhere between two thirds to nine out of every ten consumers, depending on the type of clothing being purchased. Studies also show a number of different sources of the problem. For example, a study by the Consumers Association of Canada found that 56% of buyers of women's clothing felt that garment proportions do not provide a way of guaranteeing a good fit. The Consumer Products Consumer Study found that 57% of buyers agree that the same sizes from different manufacturers can vary, and that roughly one third of consumers support the need for manufacturers to specify the body measurements in inches or centimeters of someone the item will fit.

Industry opinion is that the extent of the problem has not reduced over time, and that increasing manufacturers' development of their own size standards coupled with changes in mail order and telephone shopping habits may have intensified the problem. The continued existence of consumer problems suggests the CSS program has done little if anything to ease the situation and there may be a growing air of resignation about the situation from consumers themselves. For example, focus group discussion highlighted a 'that's life' consumer attitude to sizing problems. Many consumers believe the situation to be complex and fail to identify any action which they feel could help reduce the problem. The Consumer Products Consumer Survey found that one in five do not think trying clothes on is a

satisfactory solution and one in four feel that returning clothes to the store is not an acceptable solution. In general, the consumer mood is one where any further help would be welcomed but it is also one which shows a lack of optimism about the extent to which further help is possible or likely to prove useful.

In addition, consultations carried out with industry and consumer associations show garment manufacturers are resistant to the idea of size standards because....

- they have spent considerable time and effort developing size systems for their own target markets
- they are reluctant to develop any more standards which can be used by retailers as conditions of manufacturer supply
- they are against developing standards which can be used by importers who have not made a parallel commitment

Large retail chains in Canada are said to be achieving some compliance from manufacturers by making standard sizes a supply requirement. Because of the importance of large retailers in the market, and because of their sourcing from a wide variety of clothing manufacturers and importers, it is argued that their action is having a considerable effect in the market. This is confirmed by industry which believes that there is at least some use made of Canada Standard sizes, although there is no available evidence on industry's extent of use of the CSS system to be able to support this.

In summary, the evidence indicates that consumers problems with sizing have not reduced over time and that consumers do not consider existing methods of handling the problem to be adequate. Manufacturers are resistant to standardised sizing systems and the only hope for a solution through market forces rests with stronger action from retailers. The CSS Program appears to have made little contribution for a number of reasons one of which is industry's self-confessed resistance to lend full support to the program. In short the market is, and is likely to remain incapable of resolving the problem. This indicates a serious need for the CSS Program but CCAC must give full consideration to ways in which this can be made more effective.

6.2. Program Achievements

Appropriate CGSB committees have completed the development of size standards for children's clothing. Development of standards for women's clothing is scheduled to be completed this year and for infants' clothing, development will be completed the following year. CCAC will therefore soon have in place a full set of standards and should give immediate consideration to making sure that these standards are used to achieve optimal effect in the market.

At present, it must be recognised that the program has had limited time within which to achieve effects and has received relatively limited support from manufacturers.

Industry is somewhat critical about achievements of the CSS Program. For example, consultations with industry reveal that a number of manufacturers, retailers, and trade associations feel the program has not met its objectives by helping to reduce the number of unnecessary 'try-ons' or by helping to reduce the number of garments returned because of poor fit. Only a minority of industry members feel that the program has helped consumers buy clothing on behalf of others and few feel it has facilitated buying by telephone or from mail order catalogues. At the same time, industry estimates that only some manufacturers are using the CSS standard sizes for children's wear, and that use on women's clothing is low or non-existent. These opinions clearly contain an element of self-contradiction since if there is an admission that few are choosing to use the CSS standard sizes, it is difficult to see how the program can be judged as failing to meet its objectives.

Results from consumers suggest some market penetration of the program. For example, the Consumer Products Consumer Study found that around one third of clothes buyers claim to have seen the CSS logo. Also, relatively few felt it represented important information but this is partly due to some misunderstanding of its significance. When shown the CSS symbol, only just over half of consumers correctly interpreted it to mean uniform sizes between manufacturers. The problem is not that consumers fail to read the symbol as denoting standard size, but that they fail to understand what standard size means in practical terms.

Whether a program awareness level of one in three consumers is good or bad can only be judged according to CCAC's program objectives or expectations. However, the fact that only one in two consumers are potentially likely to understand the significance of the CSS logo strongly suggests that CCAC should review ways in which the information is presented to consumers. For example, it is tempting to suggest CCAC should consider changing the logo to make its meaning more self-evident. However this may not be necessary since there is a limit to which any logo can intrinsically convey a proper understanding of the standard size concept. It is therefore perhaps more important that Government invest greater effort to help educate consumers about the meaning and value of the CSS label; i.e. ensure greater availability of reference material. Given the lack of such material and industry's failure to publicise the CSS Program via its own clothing labels, it is hardly surprising that the CSS label has received limited recognition in the market.

Studies have found some evidence of fewer sizing problems on children's and infants' clothing where size standards are more well established. For example, the Consumers Association of

Canada published a study in 1986 which found that buyers of children's and infants' clothes generally had fewer problems with fit and tended to try on fewer different sizes to find garments which provided a good fit. Similar results were found in the Consumer Products Consumer Survey, but neither study was able to link reduced problems to awareness of the CSS label. The program may be having an effect in line with its objectives but at present these effects are not sufficiently advanced or on a large enough scale for research studies to be able to register them. At this stage, there is not enough available evidence to comment one way or the other.

In summary, there is limited consumer awareness of the CSS Program and no direct evidence on which to conclude that the CSS label is, or is not helping to reduce size problems. While development is nearing completion, standards are not fully operational in the market and have had little opportunity so far to achieve an effect. It is therefore premature to draw conclusions about the contribution of the CSS program. In terms of potential program contribution, what has to be considered is whether the program addresses areas in which consumer problems exist, and whether action can be taken to increase the likelihood that program effects can be achieved.

6.3 Program Alternatives

6.3.1. Relevance of Size Standards

The CSS Program has developed a set of body standards which define the standard for a particular size code according to the body dimensions of someone the item will fit. The program has also developed a set of garment standards which helps manufacturers by specifying the dimensions of a garment to fit

the appropriate body standard. In this way, the program helps achieve uniform sizes between manufacturers by relating garment sizes to the body standard for each size code. Recent studies have shown that consumers experience problems relating size codes to their own body measurements and problems due to the lack of uniform sizing between manufacturers. On this evidence, the CSS Program appropriately targets areas of consumer difficulty and is, potentially at least, correctly positioned to help reduce size problems.

The objective of the program is not for example to completely remove the need for consumers to try on garments; it is to reduce 'unnecessary' try-ons. Consumers will continue to try on garments to check the garment silhouette, colour, style etc. But if the program is successful it will reduce the number of different sized garments tried on to carry out these checks. Industry groups admit that the trade does not fully understand the CSS Program. Potential misconceptions about the programs' objectives such as reducing 'unnecessary' try-ons need to be cleaned up - by better communication of the program through CGSB committees - if industry is to be brought on-side and encouraged to lend greater support.

6.3.2 Increased Program Support

There are two points in particular in the literature which need to be looked at. The current set of regulations are voluntary but there are penalties set out in the National Trade Mark and True Labelling Act if producers misuse the Canada Standard Size Labelling system. As noted during the Association consultations, many manufacturers have chosen to use the system but not to use the Canada Standard Size symbol or logo in order to avoid being subject to penalties. In effect, manufacturers

are doing what they are being asked to do, but not choosing to communicate this to the market because of the potential drawbacks arising from using the symbol. As a result, the regulations are not currently achieving their desired effect since a) consumers are being deprived of an opportunity to benefit by having standard sizes pointed out to them b) manufacturers are losing the potential market benefits of having consumers make clothing decisions based on this information.

Further, although now under examination, only manufacturers who use the dimensional standards of the system can opt to use the CSS label to indicate size conformity. Manufacturers using CSS body standards have so far not had this opportunity. Again, any procedures limiting the visibility of the CSS label in the marketplace risks undermining the working effects of the program. According to industry, a major reason for their resistance to the CSS Program is the lack of consumer awareness which limits the demand for the system and for labels to indicate compliance.

This admission strongly suggests that CCAC must review current procedures in an attempt to 'take the brake off' the regulations to overcome the current 'Catch-22' nature of the situation.

6.3.3. Abandoning the Program

Among alternative action on sizing problems proposed by industry is the suggestion to abandon the CSS Program. There is no evidence to support this action. In fact, the evidence from study modules indicates the reverse; it concludes...

- that real problems exist in the marketplace and are not being solved through market mechanisms
- that size standards are relevant to areas of consumer problems and stand to make a contribution to reducing problems
- that there are certain aspects of the regulations currently inhibiting the program from achieving greater effect
- that industry has been resistant in its support of the program
- that there is a need for better CGSB communication of the program and its objectives
- that there is a need for more publicity to help educate consumers about the CSS label

None of these conclusions suggest that there are drawbacks or defects with the program, or that the program is misdirected in its approach. In all probability, the program has made little impact to date but the evidence is that this is less to do with the program itself and more to do with a number of factors affecting the extent to which it is being supported. It is too early to tell what the program will achieve, but unless some of the factors surrounding the program are addressed, it will never be given a fair opportunity to live up to its full potential.

6.4 Overall Review of the Program

Manufacturers continue to remain against the idea of size standards. Despite retailer support for the program, industry co-operation is not at levels likely to benefit the consumer either directly in the form of greater size standardisation of clothing available, or indirectly by being made aware of garments which conform to existing size standards. Aside from manufacturer resistance, CCAC needs to assess whether current efforts to educate the consumer are sufficient to be able to demonstrate the full extent of consumer demand for the information. At present, relatively few consumers are aware of the CSS label and understand its full significance. If this situation is allowed to remain, it will become increasingly difficult to overcome industry arguments that there is no consumer demand for the program.

There is an intrinsic consistency between the types of problems consumers face when choosing garment sizes and the areas in which current size standards have been developed. However, there is no way to gauge the extent to which these standards may help to reduce the size of the problem without increased support from industry and without greater effort from Government to ease the conditions for compliance. Making the program mandatory would be one way to assess the full impact that size standards could have in the marketplace, but given the degree of uncertainty surrounding the possible effects, particularly with regard to imports, there is no basis on which to propose such a move.

The evidence suggests the CSS Program has not reduced size problems faced by consumers when buying clothes, but that it is too early to comment on its potential contribution in meeting this objective. More important than a rethink of the program is

the need for CCAC to review some of the factors currently limiting support for the program. CCAC must examine ways to encourage and make it easier for industry to support the CSS program in order for the program to gain enough visibility in the market to allow consumers to exert an influence through their buying behaviour.

7. RECOMMENDED CONSIDERATIONS FOR TEXTILE PROGRAMS

Introduction

This section presents some of the major points emerging from the detailed review of each of the textile labelling programs.

7.1 Textile Labelling Regulations

Federal regulation continues to represent the most cost effective mechanism for the provision of fibre content information. Knowing what the garment is made of is a prime decision concern for consumers, and existing information allows consumers to derive a number of benefits including that of anticipating appropriate care procedures. There is no evidence of any adverse effect on competition although there may be a need for stricter enforcement of the regulations in some areas and in particular with regard to imports.

There is low consumer awareness, and use of dealer identity information in the form of CA numbers. The number is used and valued by the textile trade but there are concerns about whether the number should be allowed to substitute for the dealer's name and address from the consumer point of view. Few consumers are aware of CCAC's role in support of the dealer identity number but, given that most consumers are likely to handle complaints by taking action at the retail level, potential drawbacks to the consumer may be relatively small. Industry is resistant to providing the dealers full name and address because of the labelling cost savings of CA Numbers and any attempts by Government to change this may result in higher costs being passed on to consumers.

There is a need to review possible overlap and inconsistency between CCAC and Revenue Canada Customs and Excise in the area of country of origin labelling. While provisions in this area are currently under review, there does not appear to be a consumer case for 'Made in Canada' declarations, nor do consumers seem to be exposed to misrepresentation under current labelling provision of textile inputs.

7.2 Care Labelling

The program is deemed useful by much of industry and the majority of consumers. There are no proven adverse consumer effects due to the practice of low labelling, and labelling co-operation between domestic and foreign manufacturers and importers has sought to minimize potential restrictions on imports.

There are problems with consumer comprehension of the current care labelling scheme in Canada which need to be addressed. But the symbols and black and white format of the international system are not favoured by most Canadians. This system offers little or no potential to reduce existing problems of misunderstanding in Canada and the experience of other countries indicates the I.S.O. system has a number of other problems and potential sources of confusion.

Within Canada, there are two options which should be given serious consideration. One option is to try to make consumers more aware of the charts explaining the symbols and to enlist the support of detergent and appliance manufacturers to help improve the level of consumer education. The second option is to add words to the current system. Despite good results from the first in some other countries, it has not been successful in Canada in the past either because of insufficient funds or

logistical problems. The second is feasible in a bilingual format but could face resistance from industry because of the increased cost of the label. The fact that many European countries have integrated wording into their care labelling systems suggests this might prove to be the more effective option for consumers.

Despite the importance of care labelling information, there is not sufficient evidence on which to currently argue in favour of mandatory provision. Current compliance under the voluntary system is thought to be high, and mandatory care labels could have a potentially restrictive effect on imports and could prove an unnecessary burden on industry.

7.3. Canada Standard Size Program

It is too early at this stage to draw firm conclusions about the potential contribution of the CSS Program. While there is no evidence that size problems have been reduced, there is a good fit between the types of size problems consumers experience and the size standards developed under the program. At present, consumer awareness of the CSS label is relatively low but this may be due to poor support from industry. Manufacturers are generally resistant to size standards because of the supply leverage they afford to retailers, and because of the effort invested in developing their own size standards. These factors, among others, have contributed to relatively low levels of program participation by the trade. Some manufacturers who choose to follow the size standards of the program choose not to use the CSS label because of the risk of penalties governing its use. Thus not only is program compliance low, but what compliance there is from manufacturers is not being fully revealed in the marketplace. The result is a low program profile, giving consumers restricted opportunity to support the

system which makes industry's alleged lack of consumer demand for size standards a self-fulfilling prophecy.

If the program is to achieve its full impact, CCAC must find ways to address some of the factors currently inhibiting program support. It must promote a better understanding of the program and its objectives by improved communication with industry through CGSB committees. It must review existing regulations governing the use of the CSS label to encourage and make it easier for firms who comply with the program to communicate this to the marketplace. It must improve consumers understanding of the CSS label by providing, or helping industry to provide more educational material about the label and its meaning. It is these dynamics which have to be addressed if the CSS Program is to be given a fair chance to live up to its full potential.

There is a need for a longer term perspective on the program. At present a fully operational set of size standards is not in place and as a result research studies have had limited opportunity to detect any real signs of program achievement to date. However the development of a full set of standards is nearing completion and there are signs that retailers are becoming increasingly active in promoting the program through their influence over manufacturers and importers. If the CSS label and its significance can be brought to greater consumer attention, there is the possibility of creating market pull for the information and bringing pressure to bear on manufacturers. A move to a mandatory system is inappropriate but a review of the role of CGSB committees should be undertaken to assess their potential to orchestrate some of the environmental changes needed to increase the visibility of the program in the market.

APPENDIX

- . Bibliography
- . Detailed Background on Textile Programs

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TEXTILE LABELLING ACT

General Description

The Textile Labelling Act is "an act respecting the labelling, sale, importation and advertising of consumer textile articles". The administration of the Act and regulations is the sole responsibility of CCAC.

The Textile Labelling Act was sponsored by CCAC. Bill S-20 received third reading in the House of Commons on March 23, and royal assent on March 25, 1970. The Act was proclaimed and became effective December 13, 1971 with the exception of sections dealing mainly with label requirements which became effective December 1, 1972, the same time as the Textile Labelling and Advertising Regulations.

For purposes of the Act and regulations, a Consumer textile article is any product made from textile fibre or the fibre themselves which is in a form to be sold to a consumer. Textile fibre is any natural or manufactured matter that can be used to make yarn or fabric and includes human hair, kapok, feathers and down and animal hair or fur that has been removed from the skin. Thus, the Act is applicable to wearing apparel, piece goods, upholstery, wigs, carpets, floor covering, sleeping bags, draperies and other household textile items.

The provisions of the Textile Labelling Act form a set of requirements and restrictions regarding the labelling of consumer textile articles to disclose the true fibre content of such articles. Among the provisions of the Act, labels are required to:

- . indicate the generic name of each textile fibre comprising at least 5 percent of the total fibre weight of the article;
- . indicate the percentage of each textile fibre in the total textile fibre weight of the article;
- . give the identity of the person by or for whom the article was manufactured;

- . indicate such information or representations as specified in the regulations; and
- . be attached in a form and manner as prescribed in the regulations.

The Act also places restrictions on consumer textile articles. These include prohibiting:

- . the sale, importation or advertisement of consumer textile articles without a label indicating fibre content in accordance with the labelling requirements of the Act;
- . the advertisement or representation of the textile fibre content of an article except in accordance with the regulations;
- . the application of a label to a textile article, or the sale or importation of a textile article which has a label containing false or misleading information; and
- . the advertisement of a textile article in a manner which is misleading as to the type, quality, performance, origin, method of production or manufacture and fibre content of that article.

The provisions of the Act are enforced by inspectors appointed by the Minister of Consumer and Corporate Affairs. They have the power under the Act, upon reasonable grounds to search, seize and detain any textile articles, packaging of textile articles, or advertising material believed to be in violation of the Act or regulations. They may also examine any relevant records or data found on the premises of dealers of textile articles.

The Act stipulates that the Governor in Council may make regulations prescribing consumer textile articles for purposes of the Act, exempting articles, specifying requirements for labels, prescribing generic textile fibres and respecting the duties and functions of analysts. The Textile Labelling and Advertising Regulations have been made pursuant to the Act and hence, the evolution of labelling requirements and restrictions under the Act has been in the form of amendments to these regulations.

Original Rationale

Prior to the Textile Labelling Act, a system of labelling the fibre content of textile articles existed under the provisions of the Textile Materials Marking Regulations (P.C. 1955-1515) and the Hosiery Marking Regulations (P.C. 1962-1239 as amended by P.C. 1964-517) of the National Trade Mark and True Labelling Act. This system was considered to be inadequate because:

- . it was voluntary and as a result dealers generally chose to label their products only when there was a competitive advantage in doing so;
- . regulations only required that labels be accurate without specifying the informational content of labels;
- . fibre content could be labelled by its natural, chemical, technical or trade name, regardless of whether the trade name was registered or not; and
- . fibre composition of blended textile articles was not required on labels.

When Bill S-20 was presented to the House of Commons on March 2, 1970, the Parliamentary Secretary to the Minister of Consumer and Corporate Affairs indicated that the broad objective of the Department was to enable consumers to make intelligent and informed choices among textile products available in the marketplace. Such consumer choices required information on care of products and performance aspects such as servicability and wearing qualities. An element critical to judging these factors was knowledge of the fibre content and composition of textile products.

The Bill was also presented as a response to the requests and needs of manufacturers and retailers of textile articles. In particular, the provisions of the Bill applied equally to imported and domestically produced textile products, thereby eliminating any competitive disadvantage to firms who had endeavored to maintain a high level of informative labelling. Retailers would receive protection, comparable to that given consumers, from unfair and deceptive trade practices on the part of suppliers. Both manufacturers and

retailers would benefit from reductions in returns of articles and complaints by customers.

Once Bill S-20 was passed, the Textile Materials Marking Regulations and the Hosiery Regulations became redundant. They were revoked shortly thereafter.

Principal Participants

The origins of the Textile Labelling Act date back to the early 1950's. At that time, the Consumers' Association of Canada made representations to the federal government and in particular, the Department of Trade and Commerce, to establish a fibre content labelling system under the powers created in the National Trade Mark and True Labelling Act of 1949. Such a voluntary system was eventually put into place in the form of the Textile Materials Marking Regulations and Hosiery Regulations.

With its creation in 1967, the Department of Consumer and Corporate Affairs assumed overall responsibility for textile labelling programs, including the fibre identification program. In 1968, the Department took the first formal step in establishing a mandatory system.

Bill C-119 was introduced to the House of Commons for first reading as an Act to amend the National Trade Mark and True Labelling Act. The purpose of this act was to make it obligatory for garment manufacturers to label clearly the true fibre content of their garments. This was considered important for cleaning purposes and as an important indication of flammability. Bill C-119 was abandoned in favour of developing a new act to establish a mandatory labelling system for textile articles which would identify fibres by generic names. The National Trade Mark and True Labelling Act was designed to introduce voluntary labelling systems and standards and as such was not considered a suitable legal framework for introducing a mandatory labelling system. In particular, the National Trade Mark and True Labelling Act did not provide for inspection powers and thus would limit the extent to which a mandatory system could be enforced.

The development of a separate act requiring fibre identification of textile articles involved extensive consultation with the Consumers' Association of Canada and industry associations representing all facets of the textile sector in Canada. In 1969, meetings were held with groups including the Canadian Textiles Institute, Children's Apparel Manufacturer's Association, Montreal Dress & Sportswear Manufacturers Guild and Apparel Manufacturers Council of Canada to present the general objectives of the proposed legislation and to hear the concerns of these trade associations. The meetings were intended to provide input into the drafting of the legislation.

When Bill S-20 was presented to the House of Commons, the Consumers' Association of Canada expressed dissatisfaction with its contents. The Association was the principal initiator and proponent of an improved textile labelling system in Canada. While it supported the mandatory fibre content labelling scheme proposed in Bill S-20, the Association had also urged the introduction of a mandatory care labelling scheme which was absent from the Bill.

Further consultations with the Consumers' Association of Canada and industry representatives were held in 1971 to assist in the drafting of regulations. The first draft of the regulations was sent to 16 associations for comment. Meetings were held subsequently to discuss the concerns of the industry.

The textile fibre content labelling system is an ongoing activity of CCAC. The Department currently funds and provides direction on the allocation of financial resources for several Canadian General Standards Board* (CGSB) committees related to this and other labelling programs. The CGSB Committee on Generic Names was initiated shortly after the proclamation of the Textile Labelling Act and continues to meet to review generic names for textile fibres. Other related CGSB Committees include the Textile Test Methods Committee which deals with test methods for factors such as fibre identification, flammability, and care, and the Feather and Down Committee which is concerned with generic names and test methods for feather and down products. Each CGSB Committee consists of joint government, consumer and industry representatives.

* successor to the Canadian Government Specification Board.

Socio-Economic Conditions

Until the 1950's, most textile articles were made of natural fibres such as wool, cotton, linen and silk. There was widespread familiarity among consumers with the use of such fibres for household textile products. Consumers could readily identify the fibre content of textile articles by inspecting them and consequently, could easily determine the type of care required for the article or its durability on the basis of experience.

This relatively simple basis for informed consumer choice was eroded with the development and widespread use of man-made and blended textile fibres. The market share of textiles made of natural fibres dropped from 82 percent in 1950 to 64 percent in 1968. Of this 64 percent, substantial amounts of natural fibres were offered as blends with synthetic fibres. By 1970, there were over 2000 trade names for man-made textile fibres and fabrics.

Consumers benefited from the introduction of synthetic fibres with advancements ranging from wash and wear clothing to indoor-outdoor carpeting. Consumer choice was, however, complicated as people had to distinguish both among textile products labelled with different trade names but made of essentially the same kind of fibre, and also among products labelled with unfamiliar names representing new kinds of fibre. Since the existing textile labelling system was voluntary and only prohibited mislabelling, labels did not necessarily indicate the fibre content of textiles or the relative composition of textiles made of blended fibres.

The proliferation of man-made and blended fibres in textile articles also had unfavourable implications for manufacturers and retailers of textile articles. Customers who misjudged the fibre content of textile articles and found that textile articles did not perform to their expectations either complained and returned the article, or diverted future purchases to substitute textile articles. Manufacturers of textile fabrics as well as retailers had to compete against the introduction of "new kinds" of fabric, or articles made from such fabric. Consumer ignorance permitted the differentiation of textiles purely through the use of different fibre names. Through advertising or other

promotional means, manufacturers or retailers could encourage the development of customer preferences based on such names and hence, gain an advantage over their competitors.

Trade considerations also played a role in the development of a textile fibre content labelling scheme. Textile technology in Canada and the United States was very similar and there was a significant volume of trade in fabrics and apparel between the two countries flowing particularly from the United States to Canada. Inconsistencies in labelling and fibre identification requirements create non-tariff barriers to trade. In order to avoid such undesirable effects on trade, generic names for textile fibres were adopted for purposes of Bill S-20 from the existing international standard for generic names. Other generic names common to the United States or unique to Canada were added to form the final list of seventeen generic fibre names and their alternatives.

CARE LABELLING PROGRAM

General Description

The Care Labelling Program is a voluntary system of labelling consumer textile articles to disclose proper methods for restoration (i.e. laundering or dry cleaning) of such articles. The administration of this program is the sole responsibility of CCAC. The Department funds and provides direction on the allocation of financial resources to the CGSB Committee on care labelling.

All manufacturers or dealers of consumer textile articles are free to use the care labelling system as long as they comply with the government standard. It specifies five basic symbols and three colours. Each symbol gives one method of textile care - a wash tub for washing, a triangle for bleaching, a square for drying, an iron for pressing and a circle for drycleaning. To indicate the degree to which it is safe to proceed with the method of care, symbols are given in green, amber or red, with green indicating that the procedure is safe, amber indicating that caution should be exercised and red indicating that the procedure is not recommended.

The Standard for Care Labelling of Textiles was issued in March 1970 on behalf of the Minister of Consumer and Corporate Affairs and was found in CGSB Standard 86-GP-1. The main requirements of CGSB Standard, 86-GP-1, which is now known as the National Standard of Canada CAN2-86.1-M79, are:

- the appropriate symbols in prescribed colours must ensure restoration of the textile article to an acceptable, usable condition; and
- the label material should be sufficiently durable that the symbols can be read throughout the useful life of the textile article.

There are no legal restrictions on the sale, importation or advertisement of textile articles which do not have care labels. CCAC has the authority to prevent misuse of this system. Care labels are designated as CCAC trade marks under the Trade Mark Act. At present CCAC provides a blanket license permitting anyone who wishes to use the system to do so provided that it is used in accordance with the standard. In addition, Section 5 of the Textile

Labelling Act may be used to prohibit anyone from care labelling a consumer textile article in a misleading manner.

Original Rationale

The Care Labelling Program was introduced as part of a larger consumer textile program aimed at assisting consumers in making informed and intelligent choices among textile articles available in the marketplace. The Care Labelling Program was related to the development of fibre content legislation which became the Textile Labelling Act. The voluntary system of care labelling using symbols was intended to complement the mandatory system of fibre content labelling using generic names.

The Care Labelling Program was introduced as a voluntary system because of the nature of basic care methods. To form a workable mandatory system, care labelling requirements would have had to be stated in a specific and precise manner in order to be enforceable under law. While adequate test methods had been established for washing, bleaching and drycleaning at that time, appropriate test methods had not been developed for drying and ironing.

Principal Participants

The origins of the Care Labelling Program date back to 1962 when the Department of Trade and Commerce received representations from the Consumers' Association of Canada and the Canadian Textiles Institute. While both of these organizations expressed a need for a system of permanent labels for textile articles to indicate preferred methods of restoration, the Consumers' Association of Canada advocated the implementation of a system on a mandatory basis as opposed to the voluntary basis favoured by industry interests. In response to a request by the Department, the CGSB convened a conference in December 1962 which was attended by representatives of government, consumers, retailers, garment manufacturers, detergent suppliers, testing organizations and fabric manufacturers.

The conference recommended the establishment of a CGSB technical committee, the Committee on Care Labelling, whose mandate would be to develop a system of practical and informative care labelling. The Committee, in turn, appointed a Technical Panel of persons knowledgeable in the area of textiles to develop such a system. The Technical Panel consisted of representatives from the CGSB, National Research Council, Ontario Research Foundation, Canadian Textile Testing Laboratories, Consumers' Association of Canada, Canadian Manufacturers of Chemical Specialities Association, Simpson-Sears Limited, T. Eaton Company and Dominion Textile Company.

Between 1963 and 1968 the Technical Panel met to consider all aspects of the proposed labelling scheme. They also studied labelling schemes operating or under development in other countries as well as proposals considered at the international level. The Panel presented a draft standard for a Canadian system of textile care labelling in the spring of 1968 and it was accepted by the majority of the Committee on Care Labelling.

Since the establishment of the standard, the Committee has continued to meet to identify and define any necessary revisions to the standard. The Technical Panel also continues to exist but its membership is essentially the same as that of the main Committee. CCAC is represented on both the Main Committee and the Technical Panel.

After the Standard for Care Labelling of Textiles was announced, an Educational and Publicity Committee on the Care Labelling of Textiles was formed in the spring of 1970 under the direction of CCAC. This Committee consisted of representatives of Du Pont of Canada Limited, the Retail Council of Canada, Canadian Textiles Institute, Ontario Research Foundation, Cleanol Services, Simpson-Sears Limited, T. Eaton Company, Lever Detergents Limited, Consumers' Association of Canada, Canadian General Electric Co. Limited, CCAC and the Department of Supply and Services. This Committee no longer exists and its mandate is now performed by the Consumer Products Branch of CCAC.

Socio-Economic Conditions

The Care Labelling Program was developed in parallel with the fibre identification program. Therefore, the socio-economic conditions which affected care labelling are, to a large extent, the same as those already discussed in regard to fibre content labelling.

Since participation in the Canadian care labelling system is voluntary the program has not created any impediments to imports of textile articles; however, unilingual care instructions would be contrary to the spirit of the federal government's bilingual policy and would likely violate Quebec language law. In contrast, the United States has recently introduced a mandatory system of care labelling based on the use of words to convey proper methods for restoration. Care labels which comply with the Canadian standard are not considered to meet U.S. requirements. Consequently it is likely that textile article manufacturers in Canada who wish to export to the U.S. as well as sell domestically will be discouraged from using the Canadian system.

THE CANADA STANDARD SIZE PROGRAM

General Description

The Canada Standard Size Program is concerned with the standardization of sizes and size labelling of wearing apparel in Canada. CCAC is solely responsible for the program through its administration of The National Trade Mark Garment Sizing Regulations which were passed March 16, 1961. These Regulations outline the requirements for the application of the "Canada Standard" trademark or logo to certain articles of wearing apparel.

The development of standards under the Canada Standard Size Program is undertaken by the CGSB. CCAC has contributed to the standards development process through its membership on committees on garment sizes.* In addition, CCAC funds the committees and provides direction on the allocation of financial resources.

At present, the Canada Standard Size Program has introduced body standards for children's, infants' and women's apparel. Each of these standards has involved establishing size groups based on population surveys of body measurements, developing tables indicating body measurements for each of the size groups, and developing size labels. Dimensional standards, which establish specifications for common articles of clothing, have been determined for a comprehensive sample of children's clothing, and to a lesser extent for infant's and women's clothing. Development of dimension standards continues for these latter two population segments. There are no plans to establish size and dimensional standards for men's clothing since men's clothing has traditionally been sized by body dimensions and CCAC has received few complaints from this population segment.

The Canada Standard Size Program represents a voluntary system of size labelling as specified in the National Trade Mark Garment Sizing Regulations.

* The committees on garment sizes (Committee on Garment Sizes for Children and Infants and the Committee on Garment Sizes for Women) were formerly one Committee known as the Committee on the Standardization of Garment Sizes.

The Regulations state that the national trade mark may be applied to a garment only if:

- . the garment conforms to the dimensional standard for a garment of that kind and size;
- . the label indicating appropriate size is attached or legibly applied to the garment so that it is not easily removed or erased;
- . the national trade mark is applied legibly to a label as part of a prescribed single colour design;
- . the label incorporating the national trade mark also specifies the name of the country in which the garment was manufactured; and
- . the lettering on the label meets prescribed size, boldness and visual requirements.

Any label which uses the national trade mark or logo in accordance with the Regulations can be reproduced for purposes of advertising the garment. Also, the garment may be advertised as being a Canada Standard size.

While participation in the Canada Standard Size Program is voluntary, there are penalties to any garment manufacturer, importer or retailer who misuses the Canada Standard size labelling system. These penalties are specified in the National Trade Mark and True Labelling Act. In order to avoid being subject to these penalties, many manufacturers have chosen to use the Canada Standard sizing system without using the corresponding size logo.

Although there is no legal requirement to use the Canada Standard sizing system, certain large national retailers have required their suppliers to use the system. Because these retailers comprise a significant portion of the market, their requirement has become an effective means of imposing the system on a broad range of apparel manufacturers and importers. The committees on garment sizes have recently been altered to increase the membership of manufacturers and to give this segment of the industry more influence in the development and application of dimensional standards.

Original Rationale

Prior to the Canada Standard Size Program, sizes of garments in Canada did not necessarily bear any relationship to average body measurements of the population. This was particularly true for infants', children's and women's clothing. Children's and infants' clothing was manufactured to sizing codes based on age. Unfortunately, because of inconsistent interpretation of the code, different manufacturers made garments of different sizes for the same age.

For women's clothing there were also wide discrepancies among manufacturers' designations of size in relation to the actual proportions of garments. Thus, a woman purchasing three dresses made by three different manufacturers might take a size 18 in one make, a size 16 in the second and a size 14 in the third.

Largely in response to an intense consumer lobby, a Committee on Standardization of Garment Sizes was organized by the CGSB in 1953 to recommend "tables of measurements of garments which will form a basis for Canada Standards for the sizing and labelling of garments". The objectives of the Canada Standard Size Program which evolved from the initial work of this Committee were:

- . to reduce frustration to the shopper which occurred when there was no common concept of fit for a given size designation;
- . to facilitate consumer buying by telephone or from mail order catalogues; and
- . to reduce garment returns because of poor fit.

Since that time, additional advantages of the Canada Standard Sizing Program have been identified, particularly in regard to the benefits of the Program to garment manufacturers. In a paper presented to the Biennial Meeting of the Apparel Studies Association of Canada and to the Canadian Home Economics Association Conference in 1983, these additional advantages were identified as:

- . assisting consumers in buying garments on behalf of another person;

- . reductions to retailers of the number of garments soiled or torn due to unnecessary "try-ons";
- . providing garment manufacturers with a well-researched sizing system to provide consistently fitting garments;
- . assisting garment manufacturers in targeting production to particular market segments;
- . facilitating garment manufacturers' conversion to metric sizing; and
- . facilitating the export of manufactured garments.

Principal Participants

The Canada Standard Size Program was initiated primarily as a result of lobbying efforts by the Consumers' Association of Canada. When the Association was formed in 1947, it tabled a resolution for action to be taken to eliminate the difficulty in finding properly fitting clothes. Support for this resolution was reinforced by the results of a consumer survey conducted by the Association in 1949. Almost 75 percent of respondents indicated that standard sizes for clothing was their primary concern with textiles. Resolutions were also received from affiliated groups such as Women's Institutes and Home and School Associations.

The Consumers' Association actively lobbied the government to establish standard sizes for women's and children's clothes under the powers created in the National Trade Mark and True Labelling Act of 1949. To encourage further support, it also held a conference with officials of the Canada Retail Foundation which it described as being anxious to see manufacturers adopt standard sizes.

In 1952, the Minister of Trade and Commerce asked the National Research Council, which then operated the CGSB, to investigate the subject of standardized clothing sizes. This investigation commenced with a conference of representatives from the Department of Trade and Commerce, Department of National Defence, Ontario Research Foundation, Consumers' Association of Canada, Canadian Manufacturers' Association, Canadian Woolen and Knit Goods

Manufacturers Association, Montreal Dress Manufacturers Guild, National Association Women's Wear Bureau, National Garment Manufacturers Association, Canadian Retail Association, T. Eaton Company and Robert Simpson Company.

At the conclusion of the conference, representatives of the National Garment Manufacturers Association agreed to cooperate with the project in view of the strong support from consumers and retailers. The conference also recommended the formation of a committee of the CGSB to study sizing and size labelling of textile garments.

The Committee on Standardization of Garment Sizes first met in January 1953. It consisted of representatives from the Department of Trade and Commerce, Department of National Defence, Dominion Bureau of Statistics, Ontario Research Foundation, Consumers' Association of Canada, Canadian Woolen and Knit Goods Manufacturers Association, Infants' and Children's Wear Manufacturers Association, Montreal Dress Manufacturers Guild, National Association of Women's Wear Bureau, National Garment Manufacturers Association, Canadian Retail Federation and T. Eaton Company.

Since that time, the Committee has worked on the development of size and dimensional standards for children's, infants' and women's apparel. While the membership of the Committee has evolved through time to reflect the emergence of new industry associations, additional retailers and changed responsibilities of government departments, the composition of the Committee reflects the same types of interest groups. The majority of garment manufacturers continue to be represented, as well as a reasonable selection of representatives from consumer groups, retailers and certain government departments.

Garment manufacturers continue to resist the establishment of size standards. The three reasons for this resistance which have been offered are:

- . some manufacturers have spent considerable time and effort developing size systems for their own target market and any change would be costly;
- . there is reluctance to develop any further standards which can be used by national retailers to impose supply conditions;

- there is reluctance to contribute to the development of standards which can be used by importers who have not made a parallel commitment.

Socio-Economic Conditions

The need for standard sizing and labelling did not exist when individuals purchased their clothing on a made-to-order basis directly from tailors or seamstresses. The introduction of mass production and retail distribution of clothing garments represented a more efficient means of making and merchandising garments. At the same time, it enabled manufacturers, and hence retailers, to offer a wider choice of apparel to consumers.

Despite these advantages, consumers became frustrated with wide variations in the actual dimensions of garments made by different manufacturers but designated as being the same size. In some cases, garments did not reflect average body proportions.

While the sizing practices of garment manufacturers were not a form of deception, they complicated the consumer choice process by requiring consumers to spend more time searching for properly fitting garments from which to choose. Retailers were also adversely affected by the high incidence of consumers returning improperly fitting clothing. This was particularly true in the case of catalogue shopping where consumers did not have the opportunity to try on clothing articles before buying them.

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