to muster the very considerable technical manpower required to prosecute a case. The larger countries can easily find officials learned in the law and eager to go to Geneva to defend their position. Despite that reservation, it is up to the smaller countries, which are being anti-dumped and countervailed, to develop the modalities of effective international surveillance.

Cartelization

We turn to what, in policy terms, is a much more important problem, where it is simple enough to offer prescriptions for reform, but where there is little prospect of effective action being taken, certainly not at the international level. That is the question of what to do about the increased use of quantitative measures (including the failure to bring trade in agriculture within any set of coherent, rational rules) the increased cartilization of key areas of trade, and the increased resort to power rather than to rules, which has accompanied increased cartelization, which has helped cause cartelization, and which cartelization fosters. To put the issue in more conventional GATT terms, what can we do to improve or strengthen Article XIX (the safeguard clause) and what can we do about Article XIX surrogates - VERs, OMAs, and measures under the aegis of the MFA?

Quantitatively, though anti-dumping and countervail actions are numerous, it is the resort to cartelization and to the quantitative "management" of trade which is the more important issue,[31] and accordingly, it is legitimate to ask whether competition policy concepts can make a contribution, and how. It is convenient to divide our comments, our proposals, into two parts — those that relate to the national sytem, and those which relate to the international system within which it is assumed national systems will operate.

The general view in the trade policy community is that more can be expected by reform of the safeguard complex at the national level than at the international level.[32] One proposal for reform, parallel with our proposals above, is that the three-faceted inquiry into the competition policy aspects should be included in all domestic safeguard actions (and surrogate XIX actions, such as textile quotas). Thus the Canadian Textile and Clothing Board might be directed to bring to the forefront of their inquiries into any given textile or apparel product the state of competition in the industry in Canada, the impact on competition of the imports of Issue, and what sort of trade regime applies in the exporting countries. Are the products subsidized? Is there an exchange link system? Do specialized Canadian textile products have access to that market, and over what tariffs?[33] This is not to say that the Board now ignores the first two of there issues, but rather that they should be given more stress. Similarity, the Canadian Import Tribunal, when it is conducting an investigation under Canada's safeguard provisions (under the new Special Import Measures Act) should include in the scope of its inquiry the three-pronged competition policy issues, and in its reporting on such matters. And it should deal with these issues in some detail. It is a matter of drafting whether this be attached to a "public interest" provision or specifically spelled out. The U.S. escape clause provision, though considerably more advanced and elaborated than those of other countries is, it seems to us, defective in that the inquiry by the ITC is restricted to the question of whether or not "serious injury" is caused or threatened by imports (in the particular sense that those terms are used in the U.S. legislation, as noted in