

legal. The U.S. is, therefore, pursuing bilateral discussions with these countries, wherever possible, in an effort to eliminate the source of these goods. These discussions have, by and large not been successful.

The second half of the problem, from the American viewpoint, is their feeling that laws in the developed countries are not strong enough to effectively close off the most lucrative markets for pirated and counterfeit goods. In its own domestic legislation, the U.S. has severely toughened criminal sanctions against the import of goods which would be considered as infringing U.S. copyright and trademark statutes. The U.S. has also been seeking, within the GATT (in cooperation with the Europeans), an international agreement on counterfeit goods.

Both Canada and the United States use a mixture of civil and criminal approaches in dealing with the importation of goods which would infringe on rights protected under domestic copyright and trademark laws. In Canada, however, criminal penalties are, generally, weak in comparison with American counterparts. Criminal sanctions under the Canadian Copyright Act, for example, have not been revised since 1921. Further, the U.S. makes much stronger use of seizure of goods by customs officials than does Canada. It