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## 4.7 Nature, Natural

"Nature", "natural", "Mother Nature", "Nature's Way" are terms often misused on labels and in advertisements.

Advertisements should not convey the impression that "Nature" has, by some miraculous process, made some foods nutritionally superior to others or has engineered some foods specially to take care of human needs. Some consumers may consider foods described as "natural" of greater worth than foods not so described.

Foods or ingredients of foods submitted to processes that have significantly altered their original physical, chemical or biological state should not be described as "natural". This includes such changes as the removal of caffeine.

- A natural food or ingredient of a food is not expected to contain, or to ever have contained, an **added** vitamin, **added** mineral nutrient, artificial flavouring agent or food additive.
- A natural food or ingredient of a food does not have any constituent or fraction thereof **removed** or significantly changed, except the removal of water.

Note that some food additives, vitamins and mineral nutrients may be derived from natural sources. Some of these additives may be regarded as natural ingredients, in which case the acceptable claim would be that this food contains "**natural ingredients**". (See [Tables 4-1 and 4-2](#) below, *Processes Affecting the Natural Character of Foods.*)

**Table 4-1**  
**Processes Affecting the Natural Character of Foods with a MINIMUM of Physical, Chemical or Biological Changes**

Aeration	Grating
Ageing	Grinding
Agglomeration (without chemical change or addition)	Heating (including baking, blanching, boiling, canning, cooking, frying, microwaving, pasteurizing, sterilizing, parboiling, roasting)
Blending	Homogenization
Centrifugation	Maturation* (without chemical addition)
Chilling (including refrigerating and freezing)	Melting, thawing
Chopping	Milling
Churning	

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Cleaning*	Mixing, blending
Concentration (without chemical change)	Packaging, canning
Cutting	Peeling (without chemical change)
Deboning (manual)	Pressing
Defatting (without chemical change)	Puffing
Degerming	Reconstitution (without chemical addition)
Dissolving	Ripening* (other than by chemical means)
Drying, dehydration, desiccation, evaporation, freeze-drying	Separating (including screening, clarifying, centrifugation, decanting, extraction, filtering, shelling, trimming)
Emulsifying (without synthetic chemical addition)	Shredding
Extrusion	Smoking (without direct chemical addition)
Fermentation*	Soaking
Filtering* and clarifying	Treatment with inert gases (nitrogen pack)
Fining, finishing (without chemical change)	Treatment with toxic gases (with no chemical change)
Flaking	
Flocculation (without chemical addition)	
Forming	
Fumigation	

\* using micro-organisms

**Table 4-2**  
**Processes Affecting the Natural Character of Foods with a MAXIMUM of Physical, Chemical or Biological Changes**

Anion exchange	Esterification
Bleaching (with chemical addition)	Hormonal action
Cation exchange	Hydrogenation
Conversion (with chemical addition or synthesis)	Hydrolysis (with chemical addition)
Curing (with chemical addition)	Interesterification
Deboning (mechanical)	Oxidation (with chemical addition)
Decaffeination (with chemical addition)	Reduction (with chemical addition)
Denaturation (with chemical change)	Smoking (with chemical addition)
Enzymolysis (with chemical addition)	Synthesis (chemical)
	Tenderizing (with chemical addition)

Note that while the ingredient can be described as "natural", the food itself cannot, since it contains an added component.

**Flavour descriptors:** Substances which impart flavours which have been derived from a plant or animal source, may be claimed to be "natural". As well, any additive, such as preservatives and solvents added to a flavour preparation to have a technological effect solely on the flavour, does not modify the "natural" status of the flavouring material itself. However, the addition does alter the natural status of the food to which it has been added, even though it need not be declared as an ingredient on the food label. In other words, such foods may not be claimed to **"contain only natural ingredients"**.

Furthermore, acids, bases, salts and sweeteners may be used to impart sour, bitter, salty and sweet tastes in conjunction with natural flavours. They do not alter the

"natural" status of the flavouring material itself. For example, citric acid is not a flavour but acts only as an acidulant when used in conjunction with natural flavours.

- Note, however, that while the flavour remains "natural", such acids, bases, salts or sweeteners have an effect on the foods to which the flavour preparation is added. Therefore, the list of ingredients of such foods must declare acids, bases, salts or sweeteners which are present by their proper common names.

The status of enzymatic flavours, processed flavours, reaction flavours or nature-identical flavours has not been established under these guidelines. Each one will therefore be examined on a case-by-case basis.

## 4.8 Organic

The Standards Council of Canada (SCC) has ratified and published the National Standard for Organic Agriculture (the Standard). **Note:** In order to keep current with national and international developments, the Standard may be revised from time to time. Any reference to the Standard within this document will always refer to the latest version adopted by the SCC.

As with any other standard, the Standard does not absolve any product, individual, corporation association or organization from complying with all applicable federal, provincial and municipal Acts and Regulations (including the *Food and Drugs Act*, the *Consumer Packaging and Labelling Act* and the *Canada Agricultural Products Act* and *Air Regulations*).

### 4.8.1 The National Standard for Organic Agriculture (The Standard)

The Standard outlines principles for organic agriculture and specifies the minimum criteria which the organic sector believes should be met when food products, inputs (including fertilizers) and other products used in agricultural production are defined as organic. The Standard encompasses every aspect of organic agriculture from the point of seeding to the point of sale, including:

- converting to organic agriculture;
- creating production plans and records;
- producing crops and livestock;
- addressing requirements for maple products, honey, greenhouse crops, mushrooms, sprouted plants, *etc.*;
- producing and processing organic products;
- packaging, labelling, storing and distributing organic food products; and
- preventing co-mingling with conventional crops (i.e., non-organic crops).

**Note:** The term "organic" is not synonymous with terms such as "pesticide free" or "no pesticides". In fact, a number of "natural" pesticides are permitted for use in "organic" production.

### 4.2 Organic Claims

- According to the Standard, a food product may be labelled "organic" if it consists of at least **95 percent** organic ingredients.

- When the food product contains a minimum of 70% organic ingredients a claim may be made, provided the percentage (by weight or fluid volume, excluding water and salt, of the total ingredients in the final product) of organic ingredient(s) present in the food is made on the principal display panel (e.g., "contains x% organic ingredients" or "contains x% of organic (name the ingredient(s))".
- When a food product contains less than 70% organic ingredients, claims with respect to the organic content of the foods may be made within the list of ingredients only.

### 4.8.3 Certification

In order to demonstrate that food products described as organic actually conform to this voluntary national standard, producers or processors may ask an *independent certifying body* to inspect the production unit and products to verify that all stages of the production, processing, packaging and distribution meet the requirements of the Standard. A food which has been certified by a certification body may be labelled with the trademark of the independent certifying body that carried out the inspection.

In Canada, independent certifying bodies are accredited by the SCC, using guidelines set out by the International Organization for Standards (ISO). Provincial authorities may also provide accreditation of certifying bodies operating within their jurisdiction through provincial legislation. This role is assumed in Quebec by the Conseil des appellations agroalimentaires du Québec, and in B.C. by the Certified Organic Associations of British Columbia (COABC).

**note:** Certification of products described as organic is voluntary in all provinces except Quebec. The province of Quebec has an organic regulation which **requires** certification by a certifying body accredited by the Conseil des appellations agroalimentaires du Québec (CAAQ). For further information, consult the CAAQ Web site: [www.caaq.org](http://www.caaq.org)

Independent certification bodies are responsible for monitoring the growers they certify, and for taking action to remove organic claims if the standard is not being met.

Copies of the National Standard for Organic Agriculture are available on the Canadian General Standards Board (CGSB) Web site: [www.pwgsc.gc.ca/cgsb](http://www.pwgsc.gc.ca/cgsb)

## 4.9 Novel Foods which are Products of Genetic Modification

### 4.9.1 Novel Foods Regulations [Division 28, FDR]

"Novel Foods means

- a substance, including a microorganism, that does not have a history of safe use as a food;
- a food that has been manufactured, prepared, preserved or packaged by a process that
  - has not been previously applied to that food, and
  - causes the food to undergo a major change; and

- (c) a food that is derived from a plant, animal or microorganism that has been genetically modified such that
- (i) the plant, animal or microorganism exhibits characteristics that were not previously observed in that plant, animal or microorganism,
  - (ii) the plant, animal or microorganism no longer exhibits characteristics that were previously observed in that plant, animal or microorganism, or
  - (iii) one or more characteristics of the plant, animal or microorganism no longer fall within the anticipated range for the plant, animal or microorganism." [B.28.001]

**"Genetically modify** means to change the heritable traits of a plant, animal or microorganism by means of intentional manipulation." [B.28.001]

The regulations also require that prior to the sale or advertisement of a novel food, Health Canada be notified with sufficient accompanying information, as outlined in B.28.002(2), to conduct a safety assessment. If Health Canada deems the food to be safe for consumption, a letter of no-objection is issued notifying the petitioner to that effect. Health Canada may require for those products of genetic engineering which result in a health or safety **change** or a **significant change** in nutrition or composition to provide a declaration on the label detailing the manner in which the genetically engineered food differs from its non-modified counterpart. This statement then becomes mandatory on the novel food.

#### **4.9.2 Canadian General Standards Board (CGSB) National Standard for Voluntary Labelling and Advertising of Foods That Are and Are Not Products of Genetic Engineering**

At this time, there is no specific federal regulation or policy for negative or positive genetically engineered claims in labelling or advertising. However, since the Fall of 1999, the Canadian Council of Grocery Distributors, under the guidance of the CGSB, has been working with federal government departments, producers, consumers and other stakeholders to draft a National Standard for the Voluntary Labelling of Genetically Engineered (GE) Foods.

The development of a standard was undertaken to meet consumers' increasing desire for information with respect to application of specific techniques of biotechnology so that they can make an informed purchasing decision.

For more information, visit the CGSB website at: [www.pwgsc.gc.ca/cgsb](http://www.pwgsc.gc.ca/cgsb)

The general policies on the use of negative or positive food labelling and advertising claims, as outlined in Chapter 3 and Chapter 4 of this *Guide*, are applicable to novel foods. As with all foods, statements on labels or in advertising must be truthful and presented in a non misleading manner (see 4.3 of this Guide).

#### **10 Pure, 100% Pure, 100%, All**

The term "**pure**" should not be used on the labels of, or in connection with, an article of food that is a compound, mixture, imitation or substitute. This prohibition appeared in

the *Food and Drugs Act* before 1952. Although no such regulation exists today, consumers still expect a food described as "pure" or "100% pure" to be uncontaminated and unadulterated, and to contain only substances or ingredients that are understood to be part of the food so described.

For example, consumers do not expect a product described as "100% pure corn oil" to contain any substance other than corn oil. It should not contain any preservatives, antifoaming agents or colour even though the standards may permit them. In some cases, this claim is considered to be synonymous with the claim "**contains no preservatives**". (See 4.3.1, *No Preservative Claims*, and 4.3.2, *No Preservative Claims for Multi-functional Additives*, earlier in this chapter.)

The term "pure" or "100% pure" can be used to modify an **ingredient name** appearing in the common name of a food such as "pure vegetable oil" or "pure vegetable oil margarine". The claim can also be worded so that it refers specifically to a named ingredient in the food. The claim "made with *pure corn oil* with added preservative" implies that the corn oil used was pure, before the preservative was added to the final product.

Similarly, consumers expect that a product described as "100% pure pork sausage" would contain only meat originating from hogs and that the pork portion would contain no additives or contaminants. However, products like the sausage that are **not** single-ingredient foods should **not** be described as "100%", "pure" or "100% pure". The claim "100% pure sausage" is unacceptable.

In a few cases, however, it may be possible to describe a standardized **multi-ingredient food** as "pure" on condition that none of the optional ingredients permitted by that standard are added to the food, and on condition that the common name allowed and used to describe the food includes the names of all the ingredients of the food. For example, "**pure sweet milk chocolate**" would be expected to be made only with pure sugar, pure fluid whole milk and pure chocolate.

For reconstituted orange juice, "pure" or "100% pure" **can** be used on the label of the reconstituted product to describe the product if only water has been added to the concentrate. "Pure" or "100% pure" **cannot** be used on the label of a reconstituted product if any optional ingredient such as sodium benzoate, sugar, colour, vitamin C, etc., is incorporated into the concentrate.

In all cases, the terms "all", "pure" or "100% pure" should be used with care. If these terms are used in such a way as to imply that other similar products are adulterated or not up to standard, then the use of these terms could be construed as being misleading.

#### 4.11 Entirely, Completely, Absolutely

Although these terms are often redundant in normal usage, they may nevertheless alter the meaning of statements and claims. Generally, claims may be made when food meets legislated criteria, but regulations usually provide some tolerance. However, when claims are modified by a term such as "entirely", the tolerance, in effect, ceases to exist. For example, "**made entirely in Canada**" means that no imported sugar may be used to make a candy so described.

#### 4.12 True, Real, Genuine

Terms such as **"true"**, **"real"**, **"genuine"** and the like should be used with care. Such terms should not be used to describe foods or ingredients which are imitations or substitutes, nor should they be used in a manner which suggests that any product is an **exclusively** true, real or genuine article.

#### 4.13 Imitations, Substitutes

An **imitation** food resembles the food imitated in flavour, texture, appearance and nutritional value. A **substitute** food does not have to physically resemble the food for which it substitutes but it should have the same nutritional qualities.

Certain foods are described as "imitation (naming the food imitated)" or "(naming the food) substitute". In advertising, the descriptive word "imitation" or the word "substitute" is required to appear as part of the common name. The advertisement should promote the imitation or substitute foods on their own merits and not highlight the qualities of the foods they replace, unless they, too, have these qualities.

Many foods that are imitations of another food or substitutes are described by coined names. These names and all descriptions should be used carefully. They must not lead consumers to conclude that the imitation or substitute is genuine.

#### 4.14 Concentrated, Concentrate, Condensed, Strength, Reconstituted

These terms should be restricted to their correct usage and should not be employed in a manner that would imply nutritional superiority.

In general, the terms **"concentrated"**, **"concentrate"** or **"condensed"** may be used to describe products still in the liquid state after a substantial amount of water has been removed, for example, "condensed milk". The terms **"dehydrated"**, **"dried"** or **"powdered"** are more appropriate when the removal of the water results in a product that is no longer in a liquid state, for example, "powdered whole milk". Dehydrated fruits and vegetables and products such as soup mixes or bases are not regarded as "concentrates" or as being concentrated.

A claim that a food is "concentrated" or "condensed" and a statement pertaining to "strength" should be made only when there is a recognized standard with which to compare the product. "Concentrated orange juice" or "double strength vinegar for manufacturing purposes" are examples of correct usage.

Foods restored to their original moisture content should be described as "reconstituted" or as "made from concentrate". These terms should be part of the common name of these products.

A manufactured product requiring dilution as directed on the label before it is ready to be consumed may be described, under special circumstances, as "concentrated", "concentrate" or "condensed", even though no water has been removed during processing. Products such as concentrated liquid infant formula and condensed soup fall within this category.

Some common names, by definition, connote "concentration" or "strength", and should not be further modified by words such as "concentrated" or "condensed", (e.g., instant coffee or instant tea should not be further described as "concentrated"). Similarly, syrups should be described by a declaration of the actual amount of sugar present, rather than by the less informative term "strong".

A product is not necessarily "strong" or "concentrated" because it contains a relatively large amount of one constituent. A pudding, for example, is not "concentrated" merely because a new formula calls for 15 percent milk solids instead of 5 percent, nor is cheese a "concentrated milk".

A powdered product is not a concentrate solely because it has been made to occupy less volume than the similar product it replaces. There can be no effect of concentration when, based on mass, the same amount of each product is needed to reconstitute or prepare for normal use. Agglomerated instant coffee, for example, is not "concentrated instant coffee".

#### 4.15 Claims Regarding Grades

Grade names and standards have been established for food products such as butter, milk powder, eggs, fresh and processed fruits and vegetables, honey, maple products and meat and poultry carcasses, under the authority of the *Canada Agricultural Products Act* (including the *Livestock and Poultry Carcass Grading Regulations*), the *Meat Inspection Act* and various provincial acts. These grade names must be declared in advertisements when a price is declared and more than one grade of the food is available at retail. Grade names must not, however, be used to describe products which have not been graded.

The actual grade names vary from one type of product to another (e.g., "Canada No. 1", "Canada A" and "Canada Fancy"). It is illegal to describe products by an improper grade designation or by any words or symbols that could be mistaken for a legally-established grade description. In cases where a food product is imported, the grade assigned to the product by a grading authority established under the laws of the country from which the food was imported, may be used in any advertisements for that product.

Since grades only apply to meat and poultry carcasses, and do not apply to individual cuts, labels or advertisements for retail meat cuts may only include an indication of the grade of carcass from which the retail cut was derived (e.g. the label or advertisement should include words such as "**cut from**" or other appropriate words which do not give the impression that the retail cut was graded when indicating the carcass grade). Additionally, grade names must be reproduced in full. An appropriate reference would be "Cut from Canada AA beef".

**Note:** The label of meats, poultry meats or their products originating from federally inspected establishments which have been health inspected and passed for human food must be marked with the meat inspection legend established under the federal *Meat Inspection Act*. This legend, in the form of the word "Canada" within a circle or an ellipse, is not an indication of grade nor does it indicate that the product has been graded. It may not be reproduced by a third party nor may a repacker or retailer use it on meats or poultry packaged by them.

#### 4.16 Kosher Foods [B.01.049]

**kosher**, which means "fit" or "proper", describes foods and practices that are specifically permitted by Jewish dietary laws. Certification that a food is processed in accordance with the requirements of the Kashruth is made by a Rabbi or Rabbinical organization and identified by the appropriate Rabbi or Rabbinical organization symbol.

In the labelling, packaging and advertising of a food, the *Food and Drug Regulations* prohibits the use of the word **kosher** or any letter of the Hebrew alphabet, or any other word, expression, depiction, sign, symbol, mark, device or other representation that indicates or that is likely to create an impression that the food is **kosher**, if the food does not meet the requirements of the Kashruth applicable to it.

The terms "**kosher style**" and "**kind of kosher**" are not allowed, unless they meet the requirements of the Kashruth. "**Jewish-style food**" or "**Jewish cuisine**" are not objected to, although the foods may not necessarily meet the requirements of the Kashruth.

**Rationale:** "**Kosher style**" is considered to create the impression that the food is kosher, and therefore the food must meet the requirements of the Kashruth. "**Jewish style**" food may not necessarily create this impression.

#### 4.17 Meals, Meal Replacements, Instant Breakfast [B.01.001, B.01.053, B.24.200] (See also 8.7, 9.1, and 9.9.2 of this Guide)

A basic prepackaged meal should include selections from at least two food groups as designated in *Canada's Food Guide to Healthy Eating*. More specifically, it must consist of at least one serving of:

- meat, fish, poultry, legumes, nuts, seeds, eggs, or milk or milk products other than butter, cream, sour cream, ice cream, ice milk and sherbet; and
- vegetables, fruit or grain products.

Requirements for "**instant breakfast**", a breakfast replacement, are set out in B.01.053. Requirements for **meal replacements** are in B.24.200.

Advertisements for meal replacements or instant breakfasts should be prepared with care. The general public should not be persuaded to change good dietary habits through the use of scare advertising or by over-emphasis of nutritional claims.

Instant breakfast may not be promoted as a replacement for other meals, such as lunch or dinner, nor as snacks, nor as a part of a diet plan.

No product should be represented as a lunch, meal, instant lunch or instant meal, or in any other way which suggests that it is a complete meal, if it does not provide the combination of foods required for a prepackaged meal.

#### 4.18 Quantity: Net Contents

Claims such as "**big litre**", "**jumbo litre**" and "**full litre**" should not be used, since they

contravene paragraph 7(2)(a) of the *Consumer Packaging and Labelling Act* which prohibits any qualification of the declared net quantity of a prepackaged product. (Refer to Chapter 2 of this *Guide* for more information on Net Quantity.)

#### 4.19 Imported, Product of Canada, Made in Canada, Country of Origin

When a food product is described as "**imported**", it is understood that the food, as a unit, has been brought into Canada from another country and is sold in Canada without modification to the food itself. When a food contains a mixture of imported and domestic ingredients, only the imported ingredients may be described as being imported.

Exceptions to this general ruling are provided in the *Food and Drug Regulations*, and include imported Scotch whisky, Irish whisky, rum and brandy. These products may be sold as imported products when specific processing is done in Canada, namely blending with other imported named spirits, adjustment of the alcohol strength with distilled water or other purified water and standardization of colour with caramel addition.

Both "**made in Canada**" and "**product of Canada**" imply that the food was manufactured in this country. However, these statements do not necessarily mean that **all of the ingredients** used are domestic. It may be possible to use more appropriate and explicit terms than "made in Canada" to describe the process that the food has undergone. For example:

- "roasted and blended in Canada" to describe coffee since the coffee beans are always imported;
- "fermented and bottled in Canada from Canadian and imported grapes" to describe wine when more than 25 percent of the grape juice or the grapes are imported;
- "packaged in Canada" to describe food which is imported in bulk and packaged in Canada;
- "processed in Canada" to describe a food such as peanut butter when the peanuts are imported.

The term "made in Canada" should not be used to describe foods when it is only the label or container that is made in Canada.

More information on "made in Canada" labelling and advertising is available from Industry Canada at the following Web site: <http://strategis.ic.gc.ca/epic/internet/incb-bc.nsf/en/cp01006e.html>

Finally, according to the *Consumer Packaging and Labelling Regulations*, subsection 31(2), if a prepackaged product has been wholly manufactured or produced in a country other than Canada, and the identity and principal place of business of the person in Canada for whom the prepackaged product was manufactured or produced for resale appears on the label, then the identity and principal place of business shall be preceded by the words "**imported by**" or "**imported for**", unless the geographic origin of the product is stated on the label grouped with, or adjacent to, the Canadian name and address.

### 4.19.1 Geographical Terms

The use of geographical adjectives and illustrations indicates that the foods are bona fide products of the place named or shown, except in cases in which the geographical term has lost its significance, (e.g., hamburg steaks, Spanish onions, Boston beans).

In some cases, foods do not originate from the place named or illustrated and the descriptions may be considered deceptive or misleading. If the name of a city, a region or a country is used to describe the product, in circumstances where it could be deceptive or misleading, the name should be accompanied by a qualifier such as "style", or additional information can be provided to clearly indicate the product's geographical origin.

### 4.19.2 Alcoholic Beverages

For information on indicating country of origin on alcoholic beverages, refer to Chapter 10 of this Guide, Guide to the Labelling of Alcoholic Beverages.

### 4.19.3 National Symbols

The use of the Canadian Coat of Arms and the Canadian Flag are both protected under the *Trade-marks Act*, subsection 9(1).

#### a) Coat of Arms

The Canadian Coat of Arms cannot be used, unless permission is granted by the Department of Canadian Heritage. Requests for permission may be made to:

Manager  
Ceremonial and Canadian Symbols Promotion  
Department of Canadian Heritage  
Ottawa, Ontario K1A 0M5  
Fax (819) 997-8550

#### b) National Flag

The national flag with the 11-point maple leaf and one or two bars cannot be used unless permission for its use is granted by the Department of Canadian Heritage (see address above). There is however, no objection to the use of an 11-point maple leaf without bars.

The maple leaf should not be used on an imported food product since it may give the consumer the false impression that the product is of domestic origin.

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