

May 5, 2021

The Honourable Steven Guilbeault P.C. M.P.  
(via email to [hon.steven.guilbeault@canada.ca](mailto:hon.steven.guilbeault@canada.ca))

Dear Minister Guilbeault,

On behalf of the Canadian Association of Research Libraries (CARL), we would like to once again voice deep concerns regarding the 2020 revisions to the Canadian Cultural Property Export Review Board's (CCPERB) Guide to Monetary Appraisals.

For over forty years, CCPERB has helped encourage people to donate their valuable collections to Canadian research libraries and archives, rather than to sell them to institutions or private collectors in other countries that may have greater resources for the purchase of research collections. Canadian institutions have depended on this system of tax incentives to foster a culture of donation and to build their rich and diverse special collections. These collections are used extensively in research and teaching, as well as encouraging international collaborations and innovation.

Although CARL and other members of the archival community submitted feedback on the revised guidelines in the Fall of 2020, the Guide summarily ignores the concerns previously identified and summarized below:

- There is virtually no market in Canada for the sale of archival material. The increased dependency on demonstrating comparable sales to determine fair market value and the rejection of other methods of reasoned justification, as well as the explicit exclusion of non-monetary values, greatly reduce Canadian research libraries' ability to attract and retain significant and unique Canadiana.
  - The uniqueness of each creator inevitably renders their archival fonds unique and resistant to comparisons with other fonds.
  - Unlike art, archival materials are rarely listed in public catalogues, dealers' listings, or auction records, and their price is rarely disclosed.
  - The ability to find comparables is also severely hampered by privacy restrictions at the provincial, national, and international level.
- There are no sales precedents for digital records, and the Guide offers no direction on the monetary appraisal of such records, which are now an integral part of most modern archival fonds and of increasing importance.
- Requiring proof of sales transactions in order to receive CCPERB certification promotes regressive and systemic bias, as sales precedents for archival material pertaining to important figures and groups within Indigenous, other BIPOC, and other equity seeking communities are even less likely to exist. This is deeply troubling as the

changes coincide with these communities' increasing engagement with our members and collaborative efforts to increase the diversity of voices represented in Canada's publicly accessible special collections and archives.

As this is now a matter of urgent concern for our member institutions and their donors, we wish to ensure that your departments are aware of the negative impacts the new Guide will have on Canada's documentary heritage.

This is particularly salient as the change is inconsistent with your government's vision of the Cultural Property Program, as cited in the 2019 Budget: "To encourage Canadians to donate cultural property of 'outstanding significance' [...] to certain designated institutions in Canada, such as museums and public art galleries, the Government provides special tax incentives. These incentives help to ensure that important cultural property remains in Canada, for the benefit of Canadians."<sup>1</sup>

We believe the Board should maintain the appraisal system that has been in place for the last forty years. This approach has been to establish value based on 'reasoned justification', which allows appraisers to use previous appraisals or determinations by CCPERB and to consider research and historical value judiciously.

More detailed information on the community's concerns can be viewed on the [Canadian Council of Archives' website](#).

We hope to have the opportunity to further discuss these concerns with you and to work together to develop reasonable alternatives in order to ensure that public collections of Canada's documentary heritage continue to grow. Please do not hesitate to contact us with any questions.

Best Regards,

Jonathan Bengtson, President  
University Librarian, University of Victoria

Susan Haigh, Executive Director

Cc. The Honourable David Lametti P.C. Q.C. M.P. (via email to [David.Lametti@parl.gc.ca](mailto:David.Lametti@parl.gc.ca))

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<sup>1</sup> "Investing in the Middle Class: Budget 2019" pg. 173  
<https://www.budget.gc.ca/2019/docs/plan/budget-2019-en.pdf>