Summary

Recommendation 1:
That the Government of Canada substantially increase Library and Archives Canada’s base budget to support its mandate and accelerate its transition to digital federal government record-keeping.

Recommendation 2:
That the Government of Canada provide funding in the amount of $10M to Canada’s three research granting agencies, administered through the Social Sciences and Humanities Research Council, for a pilot program supporting the production of Canadian Open Education Resources in both official languages.

Recommendation 3:
That the Government of Canada establish an Equitable Access to Reading Fund which would be focused on ensuring that people with print disabilities across Canada have access to reading and research materials in multiple accessible formats and that the fund contributes to their ability to fully participate in learning, work and community life.

Recommendation 4:
That the Government of Canada restore ongoing sustained funding in Budget 2022 for the National Network for Equitable Library Services (NNELS) and the Centre for Equitable Library Access (CELA) to support an equitable reading landscape in Canada for people with print disabilities and to ensure that inclusive reading options exist across Canada.
Introduction

The Canadian Association of Research Libraries (CARL) is the leadership organization for Canada’s research library community. The Association includes the 29 largest university libraries across the country. CARL’s mission is to enhance the capacity of Canada’s research libraries to partner in research and higher education, seeking effective and sustainable scholarly communication and public policy encouraging of research and broad access to scholarly information.

Over the past two years, the urgency of ensuring that the provision of content is possible via digital means has become clear. Within higher education and scholarly research, the COVID-19 pandemic had a sudden and disruptive impact. Much instruction and research shifted rapidly to online, and both students and faculty have faced barriers to accessing academic library resources via electronic means.

This submission focusses on measures to support access and preservation of content in a digital environment. However, we urge the government to not lose sight of its commitment to high-speed, stable, internet access, particularly in the most remote areas, so that access to digital content is ubiquitous and equitable, from sea to sea to sea.

Recommendations

1. Increased Funding to Transform Services, Bolster Digital Delivery, and Modernize Digital Record-keeping at Library and Archives Canada

The Library and Archives Canada Act (the Act) stipulates that the institution is “to be the permanent repository of publications of the Government of Canada and of government and ministerial records that are of historical or archival value”. As such, Library and Archives Canada (LAC) holds archival records for 107 active and over 100 defunct government departments. In addition to this archival function, The Act also states that LAC is “(a) to acquire and preserve the documentary heritage” and “(b) to make that heritage known to Canadians and to anyone with an interest in Canada and to facilitate access to it.”

The December 2021 President of the Treasury Board Mandate Letter urges the Minister to find ways “to support the government’s leveraging digital delivery approaches throughout the development of major projects” and “continuing leadership to update and replace outdated IT systems and modernize the way government delivers benefits and services to Canadians”. LAC has faced reduced operational budgets and ongoing budget constraints for more than a decade, and a significant increase in the number of Access to Information

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1 Library and Archives Canada Act, Section 7(c) https://laws-lois.justice.gc.ca/eng/acts/l-7.7/page-1.html#h-345240
and Privacy (ATIP) requests related to its archival records\(^2\), LAC has not been resourced sufficiently to make the requisite shift to a digital delivery environment.

As a forthcoming Information Commissioner's report will make clear, LAC’s digital and analogue records operations cannot meet demand for access within reasonable turnaround times. Departments still tend to transfer records to LAC in paper format that must then be digitized. In addition, most records are still transferred to LAC with the status of closed-by-default, creating additional delays for processing ATIP requests since LAC must consult with the departments to release information. Sufficient and ongoing funding for this activity is crucial to compensate LAC for what should be the transferring department’s expense. In addition to increased funding, adopting an open-by-default policy at the time of records transfer for all but the most sensitive records would also help to reduce delays and associated costs related to this work.

Aside from government record-keeping activities, there is important, ongoing development of LAC’s collections to better reflect the great diversity of Canada’s voices. The institution has implemented an Indigenous Heritage Action Plan\(^3\) to support reconciliation efforts between the Government of Canada and First Nations, Inuit, and the Métis Nation. The modernization for the way government delivers benefits and services to Canadians is being supported by LAC through its reassessment and reimagining of LAC’s services that will be focusing on user needs and expectations\(^4\), and developing a new delivery model that will demonstrate the vision put forward for the future Ādisōke library and archives. These necessary transformations require increased and sustained investment to build the infrastructure to be successful.

**Recommendation:** That the Government of Canada substantially increase Library and Archives Canada’s base budget to support its mandate and accelerate its transition to digital federal government record-keeping.

### 2. New Federal Support for Canadian Open Educational Resources

Academic libraries provide access to a broad range of course materials through print and electronic reserve collections, print textbook collections, customized digital course readings, electronic and print books, and Open Educational Resources\(^5\). As students face increasingly high costs for post-secondary studies, libraries help level the playing field by

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\(^2\) 99% of Access to Information (ATI) requests relate to the archival records of other government departments that LAC holds. LAC ranks fifth in the number of ATI requests received at 2,131 reported for 2019-2020 which accounts for 5% of their operating budget (8% if one considers the cost associated with digitizing the records).

\(^3\) Library and Archives Canada Indigenous Heritage Action Plan [https://www.bac-lac.gc.ca/eng/discover/aboriginal-heritage/initiatives/Pages/actionplan.aspx](https://www.bac-lac.gc.ca/eng/discover/aboriginal-heritage/initiatives/Pages/actionplan.aspx)


providing the information resources students need to achieve academic success. CARL has been an active voice in OER and the need for digital course materials access.6

The Canadian Alliance of Student Associations (CASA) points out that “Many students continue to struggle with the auxiliary costs of attending post-secondary, such as paying for a computer, Internet, and textbooks”7 noting in particular the cost of textbooks and other course materials presenting major financial hurdles for students.8 With textbooks costing students between $800-$1,000 per year, some are forced to make difficult financial choices between life necessities and their education.9 Libraries are working with other stakeholders including content creators to ensure course materials come at a reasonable cost. But another key strategy within higher education is the creation, adoption, and use of openly licensed, high-quality open educational resources (OER). OER carry no financial costs to the user and are released under an open license that allows for a full spectrum of uses. For students, OER provide free permanent access to texts and materials; for instructors, they enable flexible course design and delivery, including the ability to build tailored resources that can be altered as events and information change, and to contextualize important social, economic, and political developments.

The production of OER in Canada has grown over the past few years, owing to some provincial governments’ investments and support from individual institutions. These investments have increased adoption of OER textbooks and reduced student expenses10. However, provincial funding has been far from consistent across Canada, ranging from long-standing programs to limited short-term project funding—or sometimes—no contributions at all.

To position Canada as a leader in the digital economy and demonstrate leadership in emerging technologies, CARL and other post-secondary education stakeholders believe that a national commitment to OER is needed. This will ensure that all Canadian post-secondary students can benefit from regionally relevant OER, to increase the availability of Canadian OER in both official languages, Indigenous content, and to support


7 CASA’s 2022 Pre-Budget Submission https://www.casa-acae.com/2022_prebudget


instructors who wish to adopt OER. That commitment should start with a pilot granting program, administered through Canada’s three granting agencies, to support production of new Canadian OER in both official languages. The pilot could prioritize content specific to Indigenous perspectives or topics about which Canada has proven itself as an international leader.

Recommendation: That the Government provide funding in the amount of $10M to Canada’s three research granting agencies, administered through the Social Sciences and Humanities Research Council, for a pilot program supporting the production of Canadian OER in both official languages.

3. Ongoing Funding for the Centre for Equitable Library Access and the National Network for Equitable Library Services

The Centre for Equitable Library Access (CELA) and the National Network for Equitable Library Services (NNELS) are national not-for-profit organizations that provide accessible reading services to the approximately 3 million people across Canada with print disabilities. NNELS and CELA depend on federal funding to produce accessible reading materials that are otherwise unavailable to vulnerable groups across Canada—including individuals with visual, physical, or learning disabilities.

CELA and NNELS offer a critical and necessary public service to ensure equitable access to reading materials for those people across Canada with print disabilities. Print disabilities encompass those who are blind or visually impaired, people with cognitive disabilities such as dyslexia and those with physical disabilities that make it difficult to read a physical book. The services provided by NNELS and CELA ensure that people with print disabilities across the country are able to more fully participate in their community, and contribute to the social, cultural, and economic development and success of their local communities and Canada as a whole.

The 2020 Fall Economic Statement announced that funding for CELA and NNELS would be reduced by 25 per cent per year until it is completely eliminated in 2024-2025. In March 2021, the Minister of Employment, Workforce Development and Disability Inclusion, announced that funding for 2021-2022 would be restored.

Building on commitments made during the 2021 federal election, the mandate letter for the Minister of Employment, Workforce Development and Disability Inclusion asks the Minister to prioritize the government’s ‘commitment to support national disability organizations to build capacity and partner in efforts to eliminate systemic barriers and to permanently fund support services that ensure equitable access to reading and other published works for Canadians with print disabilities.’

CARL supports calls made by NNELS and CELA for the federal government to establish a dedicated fund to support issues of equitable access to reading materials, to be known as the Equitable Access to Reading Fund. The fund should ensure this community has access to reading material in multiple accessible formats and that it contributes to their ability to fully participate in learning, work and community life. Furthermore, permanent funding
would help Canada meet its obligations under the Marrakesh Treaty. Currently, less than one in ten published works in Canada is produced in an accessible format for Canadians with print disabilities, and the percentage of accessible works in French and Indigenous languages is even smaller.\footnote{CARL Welcomes Federal Government’s Announcement of Continued funding for CELA and NNELS, 2021. \url{https://www.carl-abrc.ca/news/carl-welcomes-continued-funding-cela-nnels/}}

An industry led solution to providing accessible reading materials will not satisfy the demand of those requiring accessible reading services. Until permanent funding can be provided, we call on the federal government to fully restore funding for CELA and NNELS to its previous levels so that their important work in providing accessible reading materials can continue.

**Recommendation:** That the Government of Canada establish an Equitable Access to Reading Fund which would be focussed on ensuring that people with print disabilities across Canada have access to reading and research materials in multiple accessible formats and that the fund contributes to their ability to fully participate in learning, work and community life.

**Recommendation:** That the Government of Canada restore ongoing sustained funding in Budget 2022 for the National Network for Equitable Library Services (NNELS) and the Centre for Equitable Library Access (CELA) to support an equitable reading landscape in Canada for people with print disabilities and to ensure that inclusive reading options exist across Canada.

Submitted for CARL by

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