

## 30-Day National Sprint - Consultation on Artificial Intelligence (AI) Strategy [Help define the next chapter of Canada's AI leadership](#)

Submitted via email to [ised-isde@ised-isde.gc.ca](mailto:ised-isde@ised-isde.gc.ca).

**We are pleased to submit comments from the Canadian Association of Research Libraries to select sections of this consultation.**

I am responding to this consultation as ...

- A privacy advocate (NGO / public advocacy group/ legal professional)

Are you participating in this survey as an individual or on behalf of an organization?

- Organization

What sector does your organization fall under?

- Academia

### **Research and talent**

**How does Canada retain and grow its AI research edge? What are the promising areas that Canada should lean in on, where it can lead the world?**

**(i.e. promising domains for breakthroughs and first-mover advantage; strategic decisions on where to compete, collaborate or defer; balance between fundamental and applied research)**

*To retain and grow its edge in artificial intelligence (AI) research, Canada must invest in the foundational infrastructure that supports open, ethical, and globally competitive innovation. We must ensure that big technology companies do not become the primary architects of AI policy, legislation, and frameworks because their motives can conflict with the public interest. Allowing industry giants to shape the rules risks entrenching monopolies, stifling innovation, and sidelining ethical concerns like privacy, fairness, and accountability. Independent oversight—grounded in democratic values, diverse expertise, and public input— would help ensure AI serves society broadly, not only corporate agendas.*

*Higher education institutions and their research libraries are vital to Canada's AI effort. These institutions not only create and facilitate access to cutting-edge knowledge but also advance the principles of open access and open data—both of which are essential for accelerating AI research and ensuring its societal relevance.*

*As one promising area, Canada has the opportunity to become a leader in ethical and transparent data policy, particularly as it relates to appropriate uses and protections of sensitive cultural data. In keeping with Canada's commitment to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) Canada should become a champion of Indigenous data sovereignty and advocate for responsible engagement with Indigenous data on the global stage.*

*Academic libraries are natural partners in this endeavour, as their work is rooted in principles of ethical stewardship, access, and community engagement. Libraries have long-standing commitments to preserving and providing access to knowledge in ways that respect cultural protocols and intellectual property rights. Many academic libraries already collaborate with Indigenous communities to support Indigenous-led research, knowledge systems, and data governance practices. Libraries are equipped to support Indigenous data sovereignty by providing infrastructure for secure data storage, facilitating access protocols that align with community values, and promoting the CARE Principles for Indigenous Data Governance (Collective Benefit, Authority to Control, Responsibility, and Ethics). They also have expertise in metadata standards, digital preservation, and open access, which can be adapted to support Indigenous priorities around data ownership, control, and use.*

### **How can Canada strengthen coordination across academia, industry, government and defence to accelerate impactful AI research?**

**(i.e. mechanisms for cross-sector collaboration; integration of public and private research efforts; industry-sponsored research while preserving academic independence)**

*Canada's post-secondary sector is already well positioned to work collaboratively as much national computing and technological infrastructure already exists, owing to the government's leadership and investment through the Digital Research Alliance of Canada (The Alliance), CANARIE, the granting agencies, and Canada Foundation for Innovation. This infrastructure can be leveraged to enhance collaboration across other sectors while ensuring that rigorous ethical and technological standards are maintained.*

*National coordinating bodies such as The Alliance play a vital role in aligning priorities across academia, industry, government, and defence to accelerate impactful AI research. Under their vision for Sovereign AI Infrastructure Compute in Canada and through initiatives such as the nascent National Data Spaces, The Alliance facilitates data interoperability, supports shared infrastructure, and promotes open science practices that are essential for collaborative innovation. Academic libraries are key partners in this ecosystem, uniquely positioned to operationalize these goals at the institutional level.*

*University libraries manage institutional and data repositories that ensure research outputs are openly accessible, discoverable, and preserved for long-term use. They promote and implement FAIR data principles—making data Findable, Accessible, Interoperable, and Reusable—which are critical for enabling cross-sector collaboration and maximizing the utility of research data*

*across disciplines and domains. By curating open datasets and guiding ethical data stewardship, libraries help researchers meet national and international standards for responsible AI development and deployment.*

*Moreover, academic libraries provide training and support for responsible AI use, including workshops on data ethics, copyright, privacy, AI transparency, and bias mitigation. They serve as trusted educators and facilitators, helping researchers navigate complex legal and ethical landscapes while maintaining academic independence. Libraries also play a convening role, bringing together stakeholders from different sectors to engage in dialogue, share resources, and co-develop best practices.*

*By investing in the capacity of academic libraries to support open access, data governance, and interdisciplinary engagement, Canada can strengthen its national coordination efforts and ensure that AI research is both impactful and ethically grounded.*

### **What conditions are needed to ensure Canadian AI research remains globally competitive and ethically grounded?**

**(i.e. infrastructure, talent and governance enablers; ethical standards and risk mitigation; alignment of applied research with business and societal needs)**

*We discussed infrastructure as an essential component in response to a previous question. Here we focus on ensuring a regulatory regime that enables Canada's policy goals and guides responsible AI deployment across all sectors.*

*As artificial intelligence tools evolve rapidly, Canada's regulatory frameworks must keep pace to ensure that researchers, creators, and institutions can innovate responsibly and remain globally competitive.*

*While the Voluntary Code of Conduct on the Responsible Development and Management of Advanced Generative AI Systems and accompanying implementation guide are valuable resources, additional thoughtful regulation is essential. The absence of clear, flexible guidance, particularly in some core areas, such as copyright, creates uncertainty that hinders research and creative exploration.*

*While any new regulation of AI related to copyright must maintain the appropriate balance of rights and interests in Canada's copyright system, consistent with the principles of technological neutrality, it is also important to note that the Copyright Act may be an appropriate and effective tool to address some AI considerations, but not others.*

*For example, Copyright legislation is not the appropriate nor an effective way to address remuneration. Remuneration solutions are a marketplace issue that must consider creators, including artists, authors, and social media content creators and seek non-legislative ways to directly provide financial compensation to them if this is appropriate. Creating a mandatory tariff or national licensing schema for AI uses related to research, teaching, and learning could be*

*contrary to existing user rights and would perpetuate existing issues with publishing monopolies and compensation models for creators.*

*Furthermore, current provisions in the Copyright Act already address infringement and liability related to copyright when a substantial portion of a work is reproduced, which would include AI-related uses. Before considering any amendments to the Act that pertain to the scope of permissible activities, the courts should be provided an opportunity to consider any emerging issues, including those related to AI, and provide analysis and guidance for any legislative changes. And any potential legislative changes should involve comprehensive consultation with all stakeholders.*

*That said, the Copyright Act should be changed to affirm that AI generated works do not involve a human exercise of skill and judgment (e.g., CCH Canadian Ltd. v Law Society of Upper Canada, 2004 SCC 13, [2004] 1 SCR 339, paras 16, 24, etc.) and therefore do not meet the threshold to be protected by copyright. Sections 2 and 5 in the Copyright Act should be changed to confirm that “author” is a natural person and that copyright does not subsist unless created by a human being.*

*Additional changes should be made to the Act to address issues related to creator concerns and user hesitancy.*

*For example, a new text and data mining (TDM) statutory provision should be implemented to confirm that the use of a work or other subject matter for the purposes of TDM does not infringe copyright and is thus noncompensable (i.e., any remuneration would be separate from nonconsumptive TDM). In countries where TDM exceptions are enshrined in law, researchers can confidently use AI tools without fear of future legal repercussions. In the absence of explicit exceptions for text and data mining (TDM) in the Canadian Copyright Act, libraries must advise researchers to proceed cautiously when using AI tools that rely on large-scale data analysis. This circumspection often leads to hesitancy, limiting the adoption of AI methodologies that are increasingly standard in other jurisdictions. This places Canada’s research community at a disadvantage, potentially stalling innovation and reducing the country’s ability to contribute to global AI advancements.*

*Moreover, restrictive licensing agreements and digital locks further constrain the use of AI in research settings. These barriers prevent libraries from fully supporting AI-related scholarship and limit access to essential datasets and tools. Without reform, Canadian researchers risk falling behind their international peers, undermining both academic excellence and economic growth.*

*By aligning copyright policy with the realities of AI innovation, Canada can ensure that its research ecosystem remains open, ethical, and globally relevant.*

**What efforts are needed to attract, develop and retain top AI talent across research, industry and the public sector?**

**(i.e. differentiated enablers for research vs. applied talent; domestic vs. global talent strategies; targeted attraction programs and priority domains; international collaboration opportunities)**

CARL supports the Universities Canada's view that Canada has a unique opportunity to attract, develop, and retain top AI talent, but success depends on strengthening its research ecosystem. To do so, Canada should:

- Sustain and expand research investments from Budget 2024 to ensure predictable funding for researchers, students, and AI infrastructure (including compute power).
- Build on existing programs like the CIFAR Chairs Program to leverage domestic expertise and strengthen the national AI ecosystem.
- Partner with universities, which are central to attracting and developing world-class AI talent, to ensure both domestic and international researchers have the resources to thrive.
- Improve visa processing to make it easier for international talent to come to Canada, prioritizing reputable institutions with strong standards and supports.

Without these measures, Canada risks losing its AI leadership position. A well-funded, collaborative, and globally connected AI research ecosystem is essential for maintaining Canada's competitiveness and contributing meaningfully to international innovation.

## **Education and skills**

**What skills are required for a modern, digital economy, and how can Canada best support their development and deployment in the workforce?**

**(i.e. enable rapid adaptation to technological change; programs for both AI-focused careers and broader workforce readiness)**

*For Canadians to thrive in a modern, AI-enabled, digital economy, they need to gain skills in three core areas: AI-specific knowledge, broader digital literacy, and ethical and legal fluency. Academic libraries are uniquely positioned to support this skill development through education, resource stewardship, and interdisciplinary collaboration.*

*Firstly, AI-specific competencies are essential for responsible and effective engagement with technologies like large language models (LLMs). This includes understanding how these systems are trained, recognizing the influence of training data on outputs, and being aware of the limitations and probabilistic nature of AI-generated responses. Users must also learn how input phrasing affects outcomes and develop the ability to critically evaluate AI outputs for accuracy and reliability. Libraries can support this by offering workshops, curated resources, and guidance on evaluating digital tools.*

*Secondly, AI literacy must be embedded within a broader framework of digital literacy. This includes awareness of data privacy—understanding what personal information AI tools may collect and how to protect it—as well as knowledge of copyright and intellectual property rights, particularly in relation to AI-generated content. Users must also be equipped to critically evaluate information, detect bias, misinformation, and disinformation, and to engage ethically in digital environments. Libraries already provide foundational training in these areas and can expand their offerings to meet the evolving needs of AI users.*

*Finally, ethical and legal fluency is critical as AI becomes more integrated into research,*

*teaching, and creative work. Canadians must understand how copyright law applies to AI-generated content, ensure compliance with privacy legislation, and promote responsible use of AI tools in decision-making contexts. Additionally, users need contractual literacy to interpret licensing agreements and terms of service associated with AI platforms. Academic libraries can play a central role in educating users on these topics, ensuring that AI is used in ways that are transparent, fair, and legally sound.*

*By supporting and leveraging their expertise in information literacy, data stewardship, and public education, academic libraries can help Canadians build the skills necessary to navigate and shape the digital economy with confidence and integrity.*

**How can we enhance AI literacy in Canada, including awareness of AI's limitations and biases? (i.e. workplace training programs or credentials; targeted engagements and public awareness campaigns; international best practices)**

*As trusted partners embedded in post-secondary environments, research libraries play a central role in cultivating foundational literacies—such as information, digital, and copyright literacy—that are critical for navigating AI technologies. They also serve as innovation hubs that foster lifelong learning, helping students, faculty, and researchers stay current with rapid technological change.*

*Libraries should also be empowered to integrate ethical and legal education into AI literacy programs and deliver interdisciplinary training on AI fundamentals, such as how AI systems are trained, how outputs are generated, and how to critically assess their reliability and bias, alongside conversations of broader ethical considerations, including copyright, privacy and the environmental impacts of AI usage.*

*Furthermore, research libraries can collaborate with academic departments and career services to align training with workforce needs, supporting both AI-focused careers and broader digital readiness. Through these efforts, academic libraries can help build a more informed, adaptable, and ethically grounded workforce across Canada.*

**What can Canada do to ensure equitable access to AI literacy across regions, demographics and socioeconomic groups? (i.e. collaboration with other levels of government; role of industry and private sector; educational and literacy strategies to foster informed confidence)**

*As key sites of collaboration and community outreach, libraries are well positioned to play a critical role in supporting national strategies that prioritize inclusive access to AI literacy across diverse societal groups.*

*Equity in AI literacy requires intentional outreach and inclusive design, and libraries are already leading these efforts. Information literacy is a core function of the library and with the advent of AI technologies in the academy, academic libraries have begun to emerge as leaders in*

*AI-training and ethics. By partnering with public libraries and community organizations, academic libraries could extend their training programs and share their expertise beyond the academic community and reach broader populations. They can also support multilingual and culturally responsive programming to ensure that individuals from diverse backgrounds can engage meaningfully with AI technologies, particularly in both of Canada's official languages. Furthermore, academic libraries advocate for open access to educational materials and tools, helping to reduce barriers for students, researchers, and communities who may lack the resources to participate fully in the digital economy. This can translate into broader access to AI-tools, data, and training resources.*

## **Building enabling infrastructure**

**Which infrastructure gaps (compute, data, connectivity) are holding back AI innovation in Canada, and what is stopping Canadian firms from building sovereign infrastructure to address them? (i.e. strategies for derisking and promoting investment in different parts of the AI stack; government's role in derisking; partnering with foreign capital)**

*CARL supports the Digital Research Alliance of Canada's work to articulate national gaps and vision for work in this area, as outlined in their [vision for Sovereign AI Compute in Canada](#) and their proposal to Innovation, Science and Economic Development Canada to coordinate such a program. Within this ecosystem, the academic library community is particularly engaged in infrastructure relating research data management and persistent identifiers, working to ensure effective long-term stewardship of Canada's research data assets.*

## **Demographic questions**

How do you identify?

- Other (Please specify)  
National Organization

What is your age group?

(Choose the category that applies)

- I prefer not to say

Where is your business/organization currently based?

- Ontario