

CARL Response to Canada's National Artificial Intelligence Strategy: AI for All

The Canadian Association of Research Libraries (CARL) congratulates the Government of Canada on the launch of [*Canada's National Artificial Intelligence Strategy: AI for All*](#). This strategy represents a significant and timely commitment to ensuring that artificial intelligence works in the interests of all Canadians, and CARL welcomes the Government's ambition to pursue AI on Canadian terms.

The government is to be commended for engaging in broad consultations prior to authoring the strategy and for gathering perspectives from diverse stakeholders. It is gratifying to see some of the core principles from CARL's consultation submissions, including privacy, literacy and equitable access to AI, included in the strategy. The explicit acknowledgement of Canada's French-language communities and the commitment to ensuring AI systems perform equally well in both official languages also reflects an important dimension of the country's linguistic diversity and cultural identity.

As the strategy moves toward implementation, CARL strongly encourages the Government to formally recognize and engage research libraries as critical partners in achieving its objectives. Canada's research library community brings demonstrated expertise across many of the strategy's core priority areas including AI literacy, trusted research infrastructure, data stewardship, knowledge mobilization, and equitable access to information. Meaningful engagement with research libraries will strengthen the strategy's implementation and help ensure its ambitious goals are realized for the benefit of all Canadians.

The acknowledgement of Indigenous agency in AI development and its commitment to support Indigenous-led initiatives that reinforce cultural expression and linguistic vitality are welcome. Ensuring this commitment is accompanied by dedicated resources will be essential to meaningful implementation and to research libraries, having long built relationships with indigenous communities to develop respectful stewardship of traditional knowledge.

The National AI Literacy Initiative merits particular recognition. The goal of reaching one million entry-level post-secondary students and training thousands of educators represents a meaningful investment in the informed, critical engagement Canadians will need to navigate an AI-saturated world. Robust training will be essential not only

in economic terms, but to the responsible, ethical use of AI and to countering the serious and growing harms of AI-generated misinformation. Research libraries can both support the critical literacy efforts identified in the strategy and leverage their central role in the research ecosystem to secure the data infrastructure, scholarly resources, and information environments on which AI research and education depend. Moreso, CARL member libraries in particular, collaborate across the country to build and sustain research infrastructure in the collective national interest. By pooling expertise, resources, and capacity across jurisdictions, we advance initiatives that no single institution or province could achieve alone.

The strategy's commitment to trust is one of its most important foundations, and one that research libraries are integral to. Research libraries provide access to, create, organize and preserve the scholarly and scientific record that trusted AI must be grounded in. Greater transparency around the provenance of AI training data — including disclosure of the works used to train models — would strengthen rather than undermine the strategy's trust-building ambitions, and would allow Canadians, creators, and institutions to make more informed choices. Literacy cannot do its work without trustworthy content as its foundation.

We note that the strategy remains silent on copyright. As longstanding advocates for a balanced Copyright Act, research libraries believe that Canada's existing framework includes provisions relevant to AI and text and data mining, and the courts are actively working through cases that will provide important legal clarification. Fair dealing is a user's right and exceptions that support research, education, and computational analysis serve the public interest. However, increasingly, we are seeing contractual provisions in scholarly materials that deny researchers the right to use generative AI to mine the collections that research libraries purchase. Any future legislative reform should be attentive to this evolving legal and contractual landscape and take a balanced approach that protects the interests of researchers, libraries, and the public while supporting the goals of Canada's AI strategy.

As the strategy moves toward implementation, the Government should formally recognize research libraries as partners. CARL and its member institutions look forward to working with the Government to realize the strategy's vision.