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**Canadian Digital Information Strategy  
Comment Web Page**

**BCLA Response to Canadian Digital Information Strategy**

The following comments are a response from the British Columbia Library Association (BCLA) to the Consultation Version of the Canadian Digital Information Strategy released by Library and Archives Canada in 2007.

The British Columbia Library Association is a non-profit, independent, voluntary association established in 1911. Our more than 830 members include librarians, library personnel, library trustees and other interested individuals; corporate, government, school and academic libraries; publishers and library supply companies. As members of an information-based profession, we understand the value of having access to information in a variety of formats and, in particular, the value of digitizing information to make it more easily searched and to preserve it for future generations.

The Canadian Digital Information Strategy articulates a broad, forward-thinking vision for Canadian digital information, and on the whole, it is a vision that BCLA strongly supports. It is undeniable that "management of digital information in Canada is fragmented and inadequate" and that significant action needs to be taken to address the issue. On the whole, the Strategy does an excellent job of recognizing current and future trends in digital information, identifying major challenges, and defining outcomes that will serve the public interest now and in the future. The scope of the Strategy – encompassing as it does the academic and research community, the public sector, and civil society at large – is quite broad, but necessarily so if the Strategy is intended to be comprehensive.

Despite these strengths, it must be said that the Strategy's approach to the issues too often prefers general approaches to clear, specific actions. It is ambitious but not concrete, and inoffensive where it ought to be bold. If there is little here to disagree with, it is because the Strategy does little more than outline a set of views (the need for stronger content, the importance of coherent and comprehensive preservation efforts, and the open access imperative) that already enjoy broad consensus in the library and archival communities. Too many actions are either excessively vague (e.g., action 2.1.4) or merely preliminary to the actual hard work of strengthening content and ensuring preservation and access (e.g., actions 2.1.2 and 2.3.1). While Part III of the Strategy acknowledges that "the current document is missing some important detail regarding its many recommended actions," there is no recognition that it is precisely those details of implementation that should be the focus of a national digital information strategy. As Michael Geist has noted, "Most of our major trading partners, including the United States, European Union, Australia, New Zealand, and China have already established digitization strategies that feature robust programs and ambitious plans." Clear and specific initiatives, not promising but nebulous objectives, need to take priority if Canada is to be a leader in the realm of digital information.

Numerous components of the draft Strategy merit special attention. Section 1.4 of the Strategy focuses on fostering "diversity in digital content production." This is a laudable goal that BCLA firmly supports. The Strategy focuses primarily on ethno-

linguistic diversity, but it should be emphasized that diversity takes many forms; great care should be taken to ensure that alternative and marginalized voices of all kinds are strengthened and preserved, so that Canada's heterogeneity in all aspects of life – including but not limited to gender, sexual orientation, class, political opinion, and lifestyle – is reflected and maintained. Moreover, at a time when mainstream media ownership is so highly concentrated both in Canada and abroad, the Strategy should make special efforts to encourage the creation, preservation, and use of alternative and independent media, as well as blogs and other new forms of amateur and/or user-generated content.

In several places (e.g., action 1.1.5), the Strategy speaks of a need to “develop private-public partnerships” to achieve overall goals. Any such approach should be undertaken only with great caution and close consultation with stakeholders representing the public interest, as opposed to private interests that may stand to profit financially from projects of this nature. Librarians are well aware of the issues surrounding the Google Book Search Library Project, including concerns about digitization quality, openness, ownership, and long-term sustainability. Similar concerns will accompany any partnership with the private sector in the area of digital content creation and preservation, as will the more general concerns about accountability, cost, and quality of service that accompany all public-private partnerships.

Section 2.2 of the Strategy proposes the development of “a distributed network of Trusted Digital Repositories (TDRs)” in Canada. Many smaller-scale repository projects of various types already exist in this country, and a number of them (including AlouetteCanada and the LAC and CISTI repositories) are mentioned in the Strategy. It is to be hoped that any future network of TDRs will be developed in a collaborative and participatory manner with existing libraries, archives, and other memory institutions, building upon the foundation established by these and other existing repository projects, and that similar initiatives in other countries will be examined and evaluated as a way of suggesting successful approaches. Elsewhere (e.g., actions 1.2.2 and 1.3.1), the Strategy rightly recognizes the importance of technical standards and interoperability, which are key components of a national network of repositories. It is worth noting that where relevant and widely adopted standards (such as OAI-PMH and various metadata standards) already exist, they should certainly be employed rather than attempting to work with new or largely unsupported standards.

Section 3.1 addresses the need for a more comprehensively accessible technological and communications infrastructure. There seems to be an implicit recognition here that universal service – a rubric which encompasses, among other things, the coverage and affordability concerns surrounding broadband and mobile communications expressed in this section – is a necessary component of any digital information strategy that is truly committed to strong content and open, equitable access. BCLA has long supported universal service principles and certainly supports the actions outlined in section 3.1 (although this is one of many areas where more concrete, detailed plans for implementation would be greatly appreciated). The related principle of network neutrality is absent from this section, and indeed from the Strategy as a whole, but it ought to be included, since preferential treatment of some content by telecommunications providers is contrary to the democratic intent of the Strategy and to the goals of strong content, preservation, and access.

BCLA is very pleased to note that open access is one of the Strategy's major themes. Actions 1.3.2 and 3.3.3 suggest that mandated open access could be a requirement for Canadian research funding. BCLA would strongly support such a stance, as well as a more general campaign of public education and promotion of open access – all which would be consistent, not only with the leadership Canada has frequently shown in this area, but with the fundamental principles of the library and archival communities. On that note, while the development of new funding models (action 3.3.4) is an important step for fostering open access principles, it is not LAC's role to find new business models for rights holders; open access to information for the user's benefit should take priority.

The same point holds true concerning the discussion of intellectual property rights at various points throughout the Strategy. BCLA approves of a balanced approach to rights issues – i.e., an approach that preserves creator rights while fostering and promoting user rights – and would observe that, at a time when intellectual property regimes worldwide are becoming increasingly restrictive and slanted in favor of rights holders, the community of libraries, archives, and other memory institutions in Canada has a vital role to play in advocating on behalf of the user. Freeing up orphan works (action 1.1.4) and easing the licensing process (actions 3.4.2, 3.4.3, and 3.4.5) are steps in the right direction; other actions might include promoting the understanding and use of Creative Commons-style licenses, which preserve creator rights while expanding user rights, and advocating on behalf of reasonable copyright term limits.

Government information is a good example of an area where rights issues and open access issues come together. Again, however, the Strategy's proposed actions are unnecessarily timid. A more bold and visionary approach, which would benefit the Canadian public and the Canadian economy, would be to completely eliminate Crown copyright (c.f. action 3.3.1) and provide full open access to government publications instead of merely making small improvements to the Depository Services Program (action 3.3.2). The example of the United States, where all national government publications are in the public domain, demonstrates that there is nothing unreasonable in such a proposal. Moreover, it is precisely the sort of concrete and unashamedly ambitious action that a national digital information strategy ought to contemplate.

Effective action requires effective communication of a clear, concrete, and prioritized suite of actions. If its vision is to be achieved, the Strategy needs to make a stronger case about where and how innovation should take place, identifying specific and well-defined initiatives that would result in the successful achievement of its objectives. That said, the Strategy does work well as an outline of issues in digital information and a statement of intent for the library and archival communities. It presents a compelling vision of where things stand in Canada and what needs to be done; the next step is to figure out how we are going to get there.

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