



**Canadian Library Association / Association canadienne des bibliothèques**

Response to  
*Canada's Action Plan on Open Government*  
Consultation on Year 1 Progress  
September 15, 2013

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**Introduction**

The Canadian Library Association / Association canadienne des bibliothèques (CLA/ACB) is the national voice for Canada's library communities.

The CLA believes that access to the widest variety of information and points of view is essential to the functioning of a democratic society. Citizens and governments make better, more informed decisions when they take part in a free exchange of ideas facilitated by open, affordable, equitable, and timely access to information.

It is with such values in mind that CLA responds to select aspects of the Government of Canada's Action Plan on Open Government (CAPOG) including our concerns with the Government's Web Renewal Action Plan, the critical importance of having a strong and fully functioning Library and Archives of Canada, and the short timeline for response which is not consistent with "open dialogue".

**Web Renewal Action Plan**

CLA applauds the Government's plans to begin electronic publishing of useful data sets on a predictable schedule and with common criteria for publication, as well as the plan to allow Access to Information requests to be made and paid for online, thereby reducing barriers.

However, the Web Renewal plan as it relates to federal publications, including websites, presents a number of concerns. Some details of the Web Renewal Action Plan are at odds with the overall aim of better access and openness envisioned by the CAPOG.

The Web Renewal plan envisions that costs will be reduced by concentrating resources on the most effective areas, and that the resulting much smaller number of sites will be organized not by government department but by user needs and tasks, by intended audiences, and by government messaging. As well, information that is included will be that deemed most "popular" based on testing.

While CLA supports the concept of user-centric organization of information, there are a number of significant flaws in this approach. One of the central purposes of open government is transparency and accountability. This requires that information be made available according to the government's own organizational structure. Canadians have a right to know what funds are made available to each government department, how the funds are being spent, what activities and research were undertaken, and all resulting reports. While additional user-centric access points are useful and desirable, loss of department-based organization risks significant loss of transparency and accountability.

Filtering information by intended audiences and by government messaging is not consistent with open government. This approach lends itself to political interference and censorship.

There is a major concern that reducing the amount of information available, tailoring it to Government messaging, and favouring popular and task-oriented information over in-depth research, will reduce the scope of views and information that Canadians have access to in order to make informed decisions on important matters. CLA notes with interest the observation of those in the library community that information on the Navigable Waters Protection Act ceased to be available on the Government's website just as changes to the Act were becoming a controversial point and the subject of Native protests.

### **Web Archiving**

Of further concern is that the plan does not address the need to ensure web archiving of the information on existing web sites prior to reduction. While there is some indication that archiving of the Government of Canada website by whole-of-domain crawls, suspended by Library and Archives Canada in 2009, will be resumed in the near future by LAC, CLA is concerned that no cogent plan exists to ensure that it continues to be done on an uninterrupted basis.

### **Consultation Timing**

CLA applauds the Government's commitment to the global Open Government movement, and appreciates this consultation process. However, it should be noted that the deadline for this consultation process has been very short, particularly with a start date in the summer when many Canadians are on vacation or returning to school as students, parents or education practitioners. Full consultation for a national association like CLA requires sufficient time for the association to become informed about these issues and to fully engage members in preparing a well-considered response.

## **Access for All**

CLA is concerned by the CAPOG vision to publish Government information as web-only by default, a plan echoed in the Government's intention under the Deficit Reduction Action Plan to cease print publishing and end distribution of tangible formats by the Depository Services Program as of 2014. Depository libraries in Canada have been serving a vital role, since 1927: that of housing published Canadian government information and ensuring free public access. While 94% of Canadian communities have access to broadband Internet connections, less than 60% of low-income Canadians have Internet access in their homes; publishing via Web-only thereby discriminates against this group in particular.

## **A Strong Library and Archives Canada**

The CAPOG as a whole, envisions LAC as the repository of all archived Government records. However, the budget reductions to LAC have severely reduced its capacity to document and share this information. CLA is concerned that in the absence of an adequately-resourced plan to collect and preserve born-digital information, access to information other than current, high-demand, service-oriented data will be severely curtailed, if not irretrievably lost.

Recent reductions in the budget of Library and Archives Canada (LAC) resulted in significant changes to its Inter-Library Loan service including the end of acceptance of loan requests in December 2012. <http://www.bac-lac.gc.ca/Eng/pages/end-ill-service.aspx>. The result: greatly reduced access to federal government publications in print deposited at LAC under the Legal Deposit Act and to archival federal government records under the Library and Archives of Canada Act made available on microform. Print and microform were available to Canadians via the LAC ILL service. Canadians must now wait for digitization projects to proceed before these materials will be accessible once again, or be prepared to pay for reproductions. An interim plan to allow Canadians to access material waiting for digitization must be implemented.

The CLA and the broader library and archival community eagerly await the appointment of a new Librarian and Archivist of Canada. We reiterate the statement submitted to the Clerk of the Privy Council on May 24, 2013 and signed by 19 of Canada's major library and archival organizations, that it is *“essential that the person appointed to this position at this time possess the necessary qualities to meet the tremendous challenges of dealing with the complex issues of the digital environment in an era of limited financial and human resources and the demands of providing increased public access to the irreplaceable treasures of Canadian documentary heritage.”*

[http://www.callacbd.ca/sites/default/files/finaljoint\\_statement\\_24may\\_en.pdf](http://www.callacbd.ca/sites/default/files/finaljoint_statement_24may_en.pdf)

## **Yes to a Virtual Library**

The CAPOG commits to the establishment of a Virtual Library - an online searchable repository of published Government of Canada documents of all kinds. Currently the “virtual library” used by Canadian libraries is the Government of Canada Publications Catalogue. In order to maintain continued access to Government publications, electronic or otherwise, CLA supports the development of a Virtual Library that allows for the continued existence of a catalogue of federal government electronic publishing.

## **Conclusion**

Finally, it is important to note that information collected, produced, and financed by the Government of Canada has been paid for by the taxpayers of Canada. Access to this information is the right of all Canadians, and we urge the Government to increase rather than decrease access as its own Open Government philosophy directs.

Respectfully submitted by the

Canadian Library Association / Association canadienne des bibliothèques  
1150 Morrison Drive #400  
Ottawa, Ontario K2H 8S9  
T: 613.232.9625 x306 C. 613.612.6831

Barbara Clubb  
Executive Director, Interim

[bclubb@cla.ca](mailto:bclubb@cla.ca)

[www.cla.ca](http://www.cla.ca)