

The Applebaum-Hébert Report: Official Responses

EDITOR'S NOTE: *The following official responses were solicited by William Smith on behalf of Archivaria. Other archival associations did not respond separately, at least one feeling that the ACA response satisfactorily expressed its concerns. Additional institutional or associations' responses are welcomed for inclusion in future issues.*

Association of Canadian Archivists

I. INTRODUCTION

Since the announcement of the formation of the Federal Cultural Policy Review Committee in the summer of 1980, the Association of Canadian Archivists has actively supported this review and assessment of federal government cultural policy, programs and institutions. Throughout the spring and summer of 1982, the association as well as regional archival associations, archival institutions and individual archivists prepared and presented submissions to the committee.

Canadian archivists were able to bring to the Federal Cultural Policy Review Committee's attention the results of two previous studies which examined the landscape and environment of archives and the archival profession in Canada. In 1972, the Association of Universities and Colleges of Canada appointed the Commission on Canadian Studies. The subsequent report (*The Symons Report*) observed that "the future quality of Canadian studies is directly linked to the condition and resources of Canadian archives. It is not too much to say that Canadian archives are the foundation of Canadian studies." A 1980 report to the Social Sciences and Humanities Research Council of Canada, entitled *Canadian Archives*, examined the state of archives in Canada in detail, providing a statistical analysis of archival institutions. It found "a sense of crisis" in Canadian archives. No co-ordinated archival system existed in the country. Institutions were seriously underfunded. The task of preserving the nation's documentary heritage far outstripped the capacity of existing facilities, and no strategy had been developed on

a national scale to deal with this situation. The findings of these two reports provided the basis from which archivists and archives defined their landscape and environment in their approach to the Federal Cultural Policy Review Committee.

II. BACKGROUND

The Archival Landscape

Many Canadian archives are newly established institutions, created in response to the enormous need for repositories for valuable records. In a 1978 survey of 174 archives, it was found that only 49 Canadian archives had been created by 1950. By 1960, the number of archives increased by 50 per cent to 75; and in the next decade the increase was at the amazing rate of nearly five institutions per year. However, this institutional expansion has occurred without an accompanying development of sufficient financial resources, equipment and facilities, and trained staff. In 1978, fully half of the surveyed archives reported annual expenditures of less than \$20,000. Eighty per cent had budgets of less than \$50,000. The average budget of the larger archives was one-tenth that of the average for the 44 main university libraries in Canada. The archives reported that there were often no facilities for even elementary archival functions: 46 per cent without adequate space and equipment, 62 per cent without a records management program, 53 per cent without a program for preparing finding aids, and 18 per cent with no reference services. In 33 per cent of Canadian archives, there was not even a part-time paid archivist. In spite of the impressive growth in the past decades, most archives, particularly smaller university and church archives, corporate archives and historical society collections, are housed in meagre facilities dependent on a small staff and/or volunteer labour to provide necessary reference service.

An examination of the Canadian archival landscape would be incomplete without reference to the government archives. They clearly dominate the landscape. The Public Archives of Canada accounts for 60 per cent of total archives' budgets reported in the 1978 survey, and employs 40 per cent of the staff. Provincial archives exist in all provinces as well as the Yukon Territory. They account for 50 per cent of reported annual expenditures, excluding the Public Archives. While these governmental archives share a commitment to reference services, preparation of finding aids, photographic archives, microfilming, and external acquisitions, many do not have sufficient resources or facilities to support these basic archival functions. For example, in 1978 one-third of these archives did not have a conservation program. While these governmental archives certainly had better facilities and more programs in comparison with other archives, few government archives had the resources or the opportunity to assist those archival institutions in their region.

The Environment

Canadian archives, like most other heritage institutions, exist in an unstable and threatening environment. It is characterized, on the one hand, by decreasing resources for both archives and their users and, on the other hand, by increasing demands for information and services. In these cases, archives share the impact felt by such other heritage institutions as libraries, museums and art galleries. However, unlike other heritage areas, archives have not had access to direct federal government support which has permitted others to maintain acquisition programs,

to ensure ongoing conservation activities, and to develop facilities. The Canadian archival environment can be characterized by the four following factors:

Decreasing Resources: Canadian archives, like most heritage institutions, are finding themselves increasingly vulnerable to fiscal restraint. In the past year, some archives have been forced to reduce their public service, cut back on staff, eliminate acquisition programs and defer necessary facility expansion or upgrading. In some areas, such as conservation, these decreasing resources have an added impact, for archives must cope with the increasing deterioration of their collections in a multitude of media (paper, film, photographs, machine readable records). These records are unique and irreplaceable.

Increasing Demand for Services: Canadian archives have seen a decrease in the availability of support for researchers to undertake their work within archival facilities. This has been the result of cut-backs in government and university grants for research which has meant decreasing opportunities for academics and scholars to travel to their research sources. The general economic climate has also adversely affected other archives' users such as genealogists. The result for archives has been an increasing demand to make their resources and services available away from established archival facilities. There is a growing demand for interinstitution loan of microform copies as well as for research assistance through the diffusion of finding aids and inventories. Canadian archives must now make a considerable time and fiscal investment in networking and in the protocol and descriptive standard work required to effectively provide for their users' needs in a resource-scarce environment.

Increasing Information: While resources for conservation programs and public service activities have been decreasing, most archives' collections have been increasing. There has been a growing awareness in the country of the value and importance of historical documentation and information. Much of this growing demand is the welcome result of Canada's centenary and the appreciation of our country's rich history, and the explosion in genealogical research in the 1970s. Perhaps most importantly, the advent of freedom of information legislation has established a growing and broad base of public sensitivity to the value of historical as well as current documentation. Coincidentally, the paper burden of the 1960s and 1970s is now being felt in Canadian archives as the extent of archival collections continues to grow enormously. Added to this problem of volume is an increase of new media in archives' collections: photographs, motion picture film, cartographic materials and machine readable records. Each new medium has its own particular storage, handling and conservation problem. It would be difficult to find an archives in Canada which would not report serious overcrowding and lack of facilities to store properly and conserve its collections.

Government Support: One of the dominant features of the archives environment in Canada has been the absence of federal government support. Canadian archives have watched the federal government provide direct, substantial resources to most other heritage sectors, particularly museums and libraries. Beginning in 1972, the federal government, through the National Museum Corporation's National Programs, has provided financial resources for public programming, exhibitions, collections' inventorying, conservation and capital upgrading and equipment assistance. In 1978-79 alone, the National Museums Corporation provided \$9.37 million to other museums which almost equals the total operating expenditures of some 172 archives in Canada, including all provincial archives. For some years,

archives benefitted indirectly from this program, insofar as the Canadian Conservation Institute provided some limited assistance. However, with the elimination of regional conservation facilities, even this small benefit has been lost. In recent years, the Social Science and Humanities Research Council has developed two programs which provide assistance to libraries for the acquisition of amongst other items archival material. Here again, Canadian archives have found themselves excluded from government assistance. It has only been in the last year that a government program, SSHRCC's Research Tools Program, has been designed to include Canadian archives. However, even in this case, provincial archives are excluded, and thus significant and important private records located in the provincial archives do not benefit from this program.

These four environmental factors and the structure of the Canadian archival landscape have influenced archives and archivists in their consideration of federal cultural policy. Archivists concluded that no one archival institution can, by itself, deal with an environment of burgeoning demands and needs along with decreasing resources. A coordinated and cooperative approach to archiving is required in Canada. The Symons Report in 1975 and the Wilson Report in 1980 both recommended a system or network of archives. The Association of Canadian Archivists has consistently supported this idea, and in realizing the enormous requirements for network development has proposed a conceptual framework.

III. APPLEBAUM-HÉBERT REPORT

Throughout the summer of 1981, Canadian archivists presented briefs to the Federal Cultural Policy Review Committee. From groups in British Columbia to archivists in Newfoundland, all expressed their concerns about conservation, training, the lack of resources, and the need for coordination and national planning. These concerns are accurately reflected in the Applebaum-Hébert Committee's Report, and their recommendations support the requirements of Canadian archives. Foremost, Canadian archivists support the committee's contention that the "stimulation of Canadian creativity will require that the knowledge base of culture and arts be firm. Knowledge and information, and the means for their creation, storage and transmission, are fundamental to culture and the arts." Canadian archives are a fundamental agent in the storage and transmission of knowledge through their programs of records management, acquisition, custody and conservation of historical documentation. Although we sympathize with the committee's difficulty in measuring cultural benefits in a quantitative way, Canadian archivists clearly see that any concept of benefits or "merit goods" cannot be measured in terms of years or decades: the mandate of Canadian archives is the preservation of historical documentation for this and subsequent *generations*.

Canadian archivists see the federal government as having a multitude of roles and responsibilities. We are affected already by the federal government's role as regulator and catalyst as a result of the treatment of donations as taxable deductions and the existence of the Canadian Cultural Property Export Review Board. In the future, we would envisage an enhanced federal role as a patron through direct infusion of resources to archives and a catalyst in providing for the development of the Public Archives of Canada's programs and facilities as a leading national archives for other levels of government to emulate.

In particular, Canadian archivists would like to offer specific comments on some of the recommendations contained in the committee's chapter on "Heritage." Canadian archivists fully support the Federal Cultural Policy Review Committee's plea to governments "to make a substantial commitment at once to the preservation of our heritage, to recognize its unique nature, and the need to maintain this priceless inheritance for ourselves and for generations to come."

The Canadian Heritage Council

Recommendation No. 15:

The Government of Canada should establish an arm's-length agency to be known as the Canadian Heritage Council, to be a visible champion of heritage interests in Canada, recognizing the importance and particular characteristics of those interests, to promote heritage arts and sciences and to support heritage institutions.

Recommendation No. 32:

The proposed Canadian Heritage Council should be given independent authority for staffing and to be otherwise constituted to be able to operate with the maximum autonomy feasible for an arm's-length agency.

Recommendation No. 33:

The proposed Canadian Heritage Council should promote liaison among various federal departments and agencies involved in heritage, among all levels of government and between government and the private sector.

Canadian archivists support the creation of the Canadian Heritage Council as a federal government structure to support, stimulate and operate heritage programs. The formation of a council devoted to all heritage sectors will enhance the profile of heritage concerns in government and outside government. It should enhance the development of a forum for the discussion, analysis and development of the most effective approaches to heritage issues. We see the key element in the development in the Canadian Heritage Council as an on-going liaison with the professional heritage groups and associations, along with an effective representation of professionals at all levels of decision-making. The precise structure of the council, its roles, responsibilities and mandate require further analysis by the federal government in concert with professional heritage associations. In particular, we have serious concerns about the viability of combining service and granting programs within the same administrative structure.

There has been an on-going debate as to the administrative effectiveness of an "arm's-length" structure. In recent years, the federal government has been concerned with administrative and financial accountability. We suggest that administrative accountability and an "arm's-length" agency are not exclusive concepts so long as the federal government and representatives of the heritage sectors develop heritage programs together with clearly defined objectives and expected results. The on-going representation of heritage professionals and

associations is essential in order to provide effective adjudication of the council's operational and support programs.

National Archival Records Commission

Recommendation No. 30:

A National Archival Records Commission, to be responsible for the coordination and encouragement of programs devoted to the preservation and use of historical records in the care of archives throughout Canada, should be established as an independent body associated with the Canadian Heritage Council for administrative purposes. The cost of carrying out the national objectives of the National Archival Records Commission should be included in parliamentary appropriations provided for the Canadian Heritage Council.

A national archival records commission represents the core structural concept presented to the Applebaum-Hébert Committee for the development of national archival coordination and planning. The National Archival Records Commission would have the mandate to give national direction through financial support of archival programs. It would be expected to make grants for such priorities as capital projects, archival training programs and publications, and research in and development of conservation techniques and facilities. For example, we envisage that the commission would support programs for exhibitions and displays so that greater numbers of Canadians can have an opportunity to view historical documents. The Applebaum-Hébert Committee recognized the immediate, compelling requirement for the National Archival Records Commission. Its national objectives would be consistent with the role of the Canadian Heritage Council and the on-going mandate of the Public Archives of Canada. More specifically, the creation of such a commission recognizes the need to rectify the decades of federal government neglect by providing an exclusive area of competition for Canadian archives.

The Canadian archival landscape has been changing drastically in the last year as several groups have risen to the challenge of national archival coordination and networking. In the ACA's annual conference, in the regional associations' meetings, in the considerations of the Federal, Provincial and Territorial Archivists, and at the Archival Congress of Canadian archivists in Kingston in June of 1982, the concepts of networking and coordination have been evolving. Considerable work lies ahead in order to define the role and responsibilities of all those institutions and associations who wish to participate and contribute to the building of a Canadian network of archives. In the coming months a more precise role for the National Archival Records Commission will evolve as a result of our meetings and discussions. We recognize that the building of such a network will be a long, involved process. With the support of our leading institutions, a viable national network in the archival landscape will be established. The potential for national leadership and the necessary professional experience and expertise exists within the archival community. However, it cannot develop and mature without the financial commitment and support of the federal and provincial governments.

Public Archives of Canada**Recommendation No. 26:**

Suitable buildings should be provided for the National Museum of Science and Technology, the National Museum of Natural Sciences, the Public Archives of Canada and the National Library of Canada as soon as possible, in line with the accommodation priorities established by these institutions for the heritage collections for which they are responsible.

The Association of Canadian Archivists fully supports this recommendation for suitable accommodation for federal cultural institutions. Since the minister has already announced the development of new buildings for the National Museums, it urges the federal government to give priority to the Public Archives' long-standing requirement for accommodation. Canada has long suffered the embarrassment of being one of a few countries without a national archives building. The minister's announcement of Public Archives' priority in federal government accommodation planning would signify a real commitment to heritage concerns.

Recommendation No. 29:

The Public Archives Act should be revised, following consultations with provincial and private sector archivists, to reflect national needs of archival institutions throughout Canada.

Canadian archivists see that the first step in network development continued development of effective leadership within the archival community. We must build the archival networks and systems from the programs and services of leading institutions. That institutional leadership must come from the Public Archives of Canada, the provincial and other leading archives. Therefore, Canadian archivists fully support the recommendations concerning the Public Archives' legislation. The formulation of a new legislative base for the Public Archives will provide an important statement of the role of government archives in modern records management and more importantly for the archival community a statement of the duties of the national archives in the national landscape.

The federal cultural institutions do not have clearly defined mandates and management. The Applebaum-Hébert Committee recognized that this is a problem which needs to be resolved "without delay." It has led to certain confusion and redundancy in the acquisition of such unpublished documentation as literary papers, and in the research and development of conservation procedures and techniques. We urge the minister to study this question of federal cultural institutional mandates and to involve both the institutions and the professional associations in the resolution of this question.

Conservation**Recommendation No. 21:**

In recognition of the fact that conservation is a vital national aspect of heritage, the proposed Canadian Heritage Council should give special consideration to requests for grants which will ensure that every region of Canada has access to regional conservation facilities. The Canadian

Conservation Institute should report directly to the Canadian Heritage Council and receive its funding from appropriations made to the Canadian Heritage Council. The Canadian Conservation Institute should give priority to research into new conservation techniques, the results of which it should share with all Canadian heritage institutions.

Conservation is the most dominating concern of all Canadian archives. One Canadian archivist provided a realistic "archives' doomsday scenario" in which Canadians would pass into the next century with relatively less documentation than that of past centuries." The need is not only for the development of facilities and training; but also involves access to research and development. The primary concerns of Canadian archivists are not the administrative arrangements, but rather the availability and access to conservation facilities and research. Canadian archives support the establishment of regional conservation facilities now just as they have in the past so long as Canadian archives have access to the research and regional facilities. In some cases, archival needs will be provided for by National Archival Records Commission programs, but we equally recognize that in other cases the efficient use of federal government resources may dictate access to Canadian Conservation Institute facilities and programs. We must point out, however, that while archives and museums may have common conservation problems their specific concerns and requirements are often quite different. In the areas of paper mass-deacidification and photographic conservation, the Public Archives is the leading institution in Canada. Canadian archivists are now and will continue to be dependent on that conservation expertise wherever it may reside. We recommend it as a first consideration that the Canadian Conservation Institute begin to give attention to the problems of preserving historical documentation on modern wood pulp paper.

Heritage Management

Recommendation No. 24

The proposed Canadian Heritage Council should support initiatives to develop training programs in professional heritage management.

Canadian archivists fully support the development of training programs in professional heritage management. It is recognized that specialized operational training of existing archives staff will be the responsibility of the National Archival Records Commission. Many archivists must be effective managers, reporting on long-term plans and justifying resource requirements before management committees and boards of trustees who have little appreciation of the value of archival programs. In the past few years, the Association of Canadian Archivists and regional associations have provided some management training; but many more archivists require access to this training on a continuing basis. In this regard, all heritage sectors appear to have equal need, and the federal government should support initiatives within the archival community to develop these training programs. In the final analysis, there will be a benefit to the federal government: the development of professional heritage management will enhance the potential for responsible, effective and accountable utilization of federal government financial assistance.

Canadian Cultural Property Export Review Board

Recommendation No. 19

The annual sum appropriated for grants made by the Canadian Cultural Property Export Review Board should properly reflect the unpredictable and high prices of the international art market. Unspent balances from this appropriation should be carried forward to succeeding fiscal years and the Cultural Property Export and Import Act should be amended to provide authority to do this.

Recommendation No. 20

The Canadian Cultural Property Export Review Board should, while retaining its independent status, be associated for administrative purposes with the proposed Canadian Heritage Council

Canadian archivists recognize the importance of the Canadian Cultural Property Export Review Board and its considerable contribution to ensure that Canadian heritage is maintained in this country. The board must be allowed to carry forward their appropriations to succeeding fiscal years in order to be most effective in the unique environment of acquisition. Unique or unusual acquisitions cannot be forecasted. We also support the transfer of the board to the Canadian Heritage Council where it would operate in a more appropriate organizational context of heritage support.

Film and Audio Visual Archives

Recommendation No. 73

The federal government should immediately provide funds to the Public Archives of Canada to enable it to deal with the serious problem of the collection and preservation of audio and visual archives and to operate a soundly based, ongoing archival program in this area.

We fully support the recommendation that the film archives of the National Film Board and the sound and video archives of the Canadian Broadcasting Corporation should be transferred to the Public Archives to ensure preservation of this significant documentation in the most cost-effective manner. Canadian archivists are equally concerned about the preservation of regionally created federal government audio and visual archival records.

IV. OTHER ISSUES OF CONCERN

There are several other issues of concern to Canadian archivists which are given passing mention or discussed outside of the heritage section.

The Association of Canadian Archivists is concerned about the Applebaum-Hébert Committee's observations about *copyright*. The legitimate rights of Canadian authors must be protected, but a restrictive definition of "fair use" would certainly impact heavily upon equally legitimate and important research in Canadian archives. We urge the minister to seriously consider all aspects of this debate on copyright and to involve archivists in the formulation of copyright policy and legislation.

The report noted in passing the state of *postgraduate training* for archives. As the minister knows, the University of British Columbia began its graduate degree program in archival studies in 1981. This represents a milestone in professional training for Canadian archivists. However, the impact will be lost if archival institutions, particularly federal institutions, do not recognize this post-graduate degree in their hiring practices. We urge the minister to ensure that this training is given due credit in the employment of new archivists.

Canadian archivists note with interest the committee's concerns about *the role of women and native people* in Canadian culture. Over the past few years many of our archival institutions have undertaken programs to collect and preserve the historical records pertaining to the contributions of women and native people to Canadian history. Just as Canadian archives responded in the past to the federal government's concern about multi-culturalism and the documentation of ethnic groups, we recognize that special efforts must be made to ensure that the history of Canada's Indian, Metis and Inuit people is preserved. We would point out to the minister that much of the current research on native rights by both government and native people is only made possible by the existence of historical government records in Canadian archives.

V. THE FUTURE

The Association of Canadian Archivists sees the final report of the Federal Cultural Policy Review Committee as a beginning, not an end, to development of federal and cultural policy. The report signals an opportunity for archivists to more actively participate in the implementation of the committee's recommendations. The report concurs with Canadian archivists assessment of the needs of archives. It endorses the concept of a national archival records commission as the basis for support for national archival coordination. The report further recognizes the need for broad consultation in reviewing the Public Archives' legislation and in assisting the Public Archives in meeting its national archival obligations.

The national need for archival financial support, upgraded and new facilities as well as coordinated programs for conservation and training has been well documented. In past years our leading archives and the professional associations answered the challenge to develop strategies to provide for these requirements in a coordinated and planned manner. In June of 1981 representatives of the Association of Canadian Archivists and the Association des archivistes du Québec met in a national archival congress supported by the Department of Communications to consider these requirements. At its final session a series of resolutions were adopted. These resolutions are appended for your information.

The professional associations and the archival institutions can begin to meet the challenges of this work. However it requires the participation and support of the federal government through the Canadian Heritage Council, and with the leadership of its institutions.

In the coming months, Canadian archivists will continue the task of formulating the foundations for national coordination. In particular we bring attention to the following proposals:

1. We propose to consider the structural framework and the roles and responsibilities

within a national archival network beginning at the Association's annual meeting in Vancouver in June 1983;

2. We encourage the minister to consider and discuss the applications of the Applebaum-Hébert Report on archives at his meetings with his provincial counterparts and in particular to support the work of the Dominion-Provincial-Territorial Archivists Committee; and
3. We propose to meet with other heritage groups and professional associations to review common concerns and to discuss the implications of the Applebaum-Hébert recommendations. We would request the minister's support and assistance in this liaison work. In this regard the Association of Canadian Archivists has already begun to work with the Canadian Museums Association on the revision of the Statistics Canada survey on heritage institutions.

Resolutions Adopted at the Archival Congress, Kingston, June 4, 1982

1. WHEREAS the congress recognizes the need for coordination of a national archival information system; shared responsibility for conservation, for diffusion, and for development of standards; for continued development of the archival profession; and for the establishment of a coordinated program for the financial support of archival projects,

BE IT RESOLVED THAT all archives reevaluate their overall programs to achieve an appropriate balance between their traditional institutional programs and new programs designed to provide leadership to a cooperative system of archives in their region; and

the archives in each province form a coordinated network to establish common priorities and to develop services, facilities and programs of benefit to all; and

the Bureau of Canadian Archivists establish an archival advisory committee to assess priorities, recommend policies, and establish the means by which programs and funds can be administered for archival projects in Canada.
2. BE IT RESOLVED THAT the Dominion-Provincial-Territorial Archivists together and severally make it their policy to support the establishment of a working group or committee to develop national standards for the description of archives.
3. BE IT RESOLVED THAT the Bureau of Canadian Archivists establish a working group consisting of experienced archivists for the development of national standards for the arrangement and description of archives, oversee the appointment of members to the working group in consultation with the Dominion-Provincial-Territorial Archivists, regularly inform the Canadian archival community of the activities and progress of the working group, and submit a grant proposal to the SSHRCC for the purpose of drafting such national standards for archival materials of all media.
4. BE IT RESOLVED THAT this congress go on record as endorsing in principle the inclusion of provincial and territorial archives in the SSHRCC's Resources Program and Research Tools Program.

5. BE IT RESOLVED THAT the SSHRCC be requested to appoint a larger number of professional archivists to serve on the assessment committees for the Research Resources and Research Tools programs; and
6. WHEREAS this congress sees with satisfaction that the SSHRCC has recognized archives as a special domain in its granting programs, but asks to give this domain special attention given the principal role of archives in the development of Canadian studies,

BE IT RESOLVED THAT SSHRCC work in close contact with the main professional associations, i.e. ACA and AAQ, for the establishment or the development of grants for archives; and

SSHRCC improve the diffusion of information about its grants programs for archivists by communicating directly all relevant information to the heads of the various repositories and to the main associations of archivists.
7. BE IT RESOLVED THAT the SSHRCC be requested to call on an advisory group on Canadian archives to meet under the aegis of the SSHRCC to advise the SSHRCC in its efforts to assist the archival system.
8. BE IT RESOLVED THAT provincial and territorial networks be included in the plans and activities of archives, taking regard to their individual circumstances and those of the Public Archives of Canada; and

these networks report on their organization and experience for publication for the mutual benefit and information of the Canadian archival community.
9. WHEREAS this Congress recognizes the historical interconnection between archival keepers and users,

BE IT RESOLVED THAT Canadian archives endeavour to involve in a meaningful manner their communities of users in the development and promotion of the Canadian archival networks.
10. BE IT RESOLVED THAT future meetings between representatives of archives associations and institutions from all regions of Canada be organized by the Bureau of Canadian Archivists.
11. BE IT RESOLVED THAT this congress recognizes the considerable support and cooperation of the Public Archives of Canada in the development of Canadian Archives and looks forward for its continuation in the future.
12. BE IT RESOLVED THAT the French and English versions of these Resolutions be considered to have the same meaning by the Committee of Resolution.

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Public Archives of Canada

Several recommendations refer directly to archives and a number of other suggestions are of interest to the Public Archives of Canada. The following preliminary comments refer only to those of greatest significance.

Legislation

Two recommendations of the Federal Cultural Policy Review Committee (Numbers 26 and 29) support the two highest priorities of the Public Archives of Canada: archives legislation and a comprehensive accommodation plan. Since January 1982, work has been deferred on both of these projects until the autumn of this year [i.e. 1982]. The Public Archives is now prepared to complete a discussion paper and memorandum for a National Archives and Records Act.

Accommodation

Discussions should now also be revived with officials of other departments on the Public Archives' comprehensive accommodation plan. The comprehensive plan offers several long-term options to deal with the severe space problems of the National Library and the Public Archives described by the committee. Now that the most urgent accommodation requirements of the National Museums have been met, a Public Archives building should have highest priority.

Grants and Other Assistance

A third recommendation (Number 30) proposes the creation of a National Archival Records Commission, funded by a Canadian Heritage Council, primarily to provide grants and coordination for the archival community. The Dominion, Provincial and Territorial (DPT) Archivists Conference produced a report on 31 August 1982 related to the same subject.

The committee also recommends that Public Archives of Canada legislation should reflect national needs of archival institutions throughout Canada. Taken together these recommendations appear to be consistent with current legislative proposals and the approach of the DPT Report, inasmuch as they provide for an arm's-length granting agency on the one hand and the provision of services by the Public Archives on the other.

Conservation and Restoration

The committee and the DPT Report both deal specifically with conservation issues. PAC agrees with the committee's recommendation (Number 21) that the Canadian Conservation Institute (CCI) should give priority to research into new conservation techniques, the results of which it should share with all Canadian heritage institutions. The CCI should extend its mandate to include archival institutions. The Public Archives would not then need to assume the full role in this area envisaged by the DPT Report. Nevertheless, the Public Archives would continue research in

fields not investigated by the CCI such as magnetic tape, videotape, film and videodisc.

Copyright

It is regrettable that the committee in its discussion of copyright did not refer to the need for a "fair use" principle that would permit the use of the mass of archival documents that were never intended to produce revenue.

Acquisition

As proposed by the committee, the Public Archives would welcome an examination of the acquisition mandates of federal heritage institutions including any area of duplication between the Public Archives and the National Library. Documentation on the principles that underlie the PAC acquisition policy has been prepared, including a published response to *The Future of the National Library*.

Film and Television

The committee has recognized current accomplishments in film and television and recommended (Number 73) additional resources for the Public Archives for this purpose. Additional resources are always welcome, but this priority should be evaluated with other urgent requirements.

Conclusion

PAC commends the committee's inclusion of an extensive discussion of heritage issues in its report and their conclusion that there should be a new recognition of the central place that heritage must have in cultural policy. The major issues of concern to the archival community have been addressed and the recommendations are compatible with those of the Dominion, Provincial and Territorial Archivists Conference.

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Canadian Museums Association

Heritage must be defined to include the tangible and intangible aspects of our natural and cultural past from pre-history through the present. Artifacts and information about social history, native cultures, the built and natural environment and the fine and applied arts constitute non-renewable resources from Canadian society upon which knowledge about the past provides comprehension of the present and hope for understanding in the future.

Heritage must be considered within a universal context. It is central to all cultural concerns of society, providing continuity and memory. Through heritage we transmit our ambitions, accomplishments, lessons and values.

Heritage institutions are an integral part of the heritage community which collects, documents, preserves, studies, researches, exhibits, interprets and disseminates information about our past and our present. These activities are carried out in the public trust, which must be preserved and defended at all times and at all cost. Short-term expediencies, manipulation or distortion can have no place in heritage concerns.

Two fundamental and essential principles form the foundation for all the Canadian Museums Association's comments and observations and we praise and support the report's recognition of these principles. The validity of the *arm's-length principle* in all matters relating to heritage and the necessity of *on-going consultation* with the heritage community to ensure the highest measure of professional expertise are fundamental to the success of Canadian cultural policy.

The Federal Responsibility for Heritage

The federal responsibility for heritage can be defined broadly in four separate and distinct areas:

- a) Custodial,
- b) Services and Programs,
- c) Support and
- d) Advisory/ Review.

It is important to stress that while there may be many opportunities for cooperation amongst the four areas, the combining or overlapping of individual areas leads to competition and potential distortion of purpose and function, as the Applebaum-Hébert Report has pointed out.

a) Custodial

The federal government bears custodial responsibility for *all* national collections. The Canadian Museums Association is in full agreement with the report's insistence that appropriate accommodation be ensured for all national collections. We are further encouraged by the report's recognition of essential museological activities of research, collection, preservation, documentation, exhibition and interpretation, and that increased attention and financial support *must* be directed towards these activities.

b) Services and Programs

The innovative federal services/ programs created within the last decade are essential to the preservation of heritage in Canada through and in institutions across the country. They include many that are currently part of the National Museums of Canada, such as the Canadian Conservation Institute, the Canadian Heritage Information Network and the International Program, as well as the Heritage Canada Foundation, the Canadian Inventory of Historic Buildings and the Canadian Cultural Property Export Review Board. They are fundamental to Canada's heritage responsibilities and must therefore be afforded the necessary financial and administrative support.

c) *Support Responsibilities*

The federal government has demonstrated leadership in its support of heritage across Canada through granting programs to assist with exhibition, interpretation, documentation, touring, professional development and training. In addition, it has offered support towards operational costs of museums and galleries through the Museums Assistance Program of the National Museums of Canada and the Canada Council. This assistance is determined by peer review, which involves the assessment by and advice of the museum and gallery community, and must be available to all heritage agencies and institutions. This support, coupled with that of other levels of government, has assisted in the creation of a museum community which is envied by many nations.

d) *Advisory/ Review*

To ensure efficiency, quality and accountability, various federal agencies and departments must, on an on-going basis, review, advise and recommend on a broad range of cultural policy issues. They must also, in turn, function as liaison on cultural issues with other federal departments and provincial ministries.

The Canadian Heritage Council

Central to many of the recommendations concerning heritage is the creation of a Canadian Heritage Council. In fact, the report states that "this is the single most important recommendation we have to make about the future management of Canada's national heritage."

The Canadian Museums Association is in full support of the establishment of such a council. However, given our statement concerning potential overlap and conflict in purpose outlined above, the Canadian Museums Association encourages the establishment of the Canadian Heritage Council primarily *as a funding agency*.

Funding programs which are currently the responsibility of the National Museums of Canada, Museums Assistance Program, would be more appropriately the responsibility of the new council. In this regard, we recommend that all existing programs for assistance towards heritage activities and institutions undergo evaluation and review through consultation with the museum community, with a view to ensuring that the vital activities of research, documentation and interpretation in addition to exhibition and conservation receive an increased and appropriate share of funds, as recommended in the report.

Considerable study is needed to determine the shape and to enunciate the role and responsibilities of the Canadian Heritage Council clearly; however, the Canadian Museums Association advocates initially a Heritage Council modelled on the Canada Council, with firm adherence to the arm's-length principle in its composition, staffing and decision-making processes. We cannot stress too strongly that the Heritage Council's mandate must be clearly spelled out, its authority to carry out its duties concisely articulated, and that it must be ensured adequate funds to operate its programs.

As indicated, the Canadian Museums Association sees the Canadian Heritage Council as a funding agency, and cannot concur with the recommendations that the Council also assume responsibility for services and programs such as the Canadian Conservation Institute, the Canadian Heritage Information Network and the Heritage Canada Foundation.

Simply stated, there is a real risk that such an action would place these services and programs in direct competition for resources with the funding activities and programs of the Heritage Council. At this early stage, the Canadian Museums Association is not prepared to offer comment on which agency or institution would be more appropriate to oversee the Canadian Conservation Institute, the Canadian Heritage Information Network, etc. The National Museums of Canada are currently fulfilling these responsibilities; this will allow us to undertake further consultation prior to supporting the existing arrangement or offering alternate proposals.

Within the same context, the Canadian Museums Association also is unable to support the recommendation that the Canadian Heritage Council should promote liaison amongst various federal departments, provincial ministries and the private sector. While we fully agree with the spirit of the recommendation, the practicality of an arm's-length agency having the resources and direct links with federal and provincial departments negates the very principle.

In considering priorities, the Canadian Museums Association wishes to stress that we are fully aware that an essential component of any implementation schedule will be the availability of new resources, both human and financial. We are also aware that the implementation of many of the recommendations may take many months, indeed years; further we believe this is both appropriate and wise. Indeed, if we have any reservations, it may be that in the interests of political expediency, the federal government may move too quickly, without sufficient deliberation and weighing of alternatives.

As evidenced in our preceding comments, the Canadian Museums Association is very much in support of the spirit embodied in the report's recommendations. While we do on occasion take issue with the practical application of certain principles, we commend the Federal Cultural Policy Review Committee for their efforts, and strongly urge the federal government to seriously weigh all recommendations.

The CMA wishes to make one further recommendation, namely the establishment in the very near future of an Advisory Committee on Heritage. This committee, composed of heritage and museum professionals from across the country, would initially assist and advise the Ministerial Sub-Committee on Broadcasting and Cultural Affairs in its task of reviewing the Applebaum-Hébert Report and would subsequently act in an advisory capacity to the Minister of Communications on the broad range of cultural policy and heritage issues.

We are confident that the committees will be receptive to such suggestions, in the same way the Canadian Museums Association found the Federal Cultural Policy Review Committee receptive to our insistence that museums and heritage institutions are not a "cultural industry." The report reflects in the broader sense the committee's willingness to remove the notion of a product/profit orientation from

heritage matters and, in its place, to emphasize the importance of knowledge and information in the museum context.

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Association of British Columbia Archivists

At the outset, the Association of British Columbia Archivists would like to congratulate the Federal Cultural Review Committee on its assessment of the need and importance of a consistent archives policy which will suit the country as a whole. We, as archivists, feel that many of the concerns which were expressed in our brief to the Applebaum-Hébert Committee have been dealt with in the final report of the committee and that constructive recommendations addressing both immediate and long range problems have been proposed.

In particular we would express our support and encouragement for the establishment of a Canadian Heritage Council. We see an arm's-length agency, championing the heritage interests in Canada, recognizing the importance and particular characteristics of those interests, promoting heritage and supporting heritage institutions, as a major step in recognizing the interrelation and interdependence among the many national, provincial and regional strands contributing to our lives in Canada. The council will be of prime importance to our cultural future. We agree that it should be given independent authority for staffing in order to operate with the maximum autonomy feasible for an arm's-length agency. We also believe that such an agency will help to promote liaison among all agencies and government departments concerned with heritage.

We would hope, however, that the establishment of a Canadian Heritage Council will not obscure what we consider to be the most important recommendation of the Applebaum-Hébert Committee insofar as archives are concerned — the establishment of a National Archival Records Commission to be responsible for the coordination and encouragement of programs devoted to the preservation and use of historical records in the care of archives throughout Canada. Most of the problems presented in the brief of the Association of British Columbia Archivists would be greatly alleviated if this commission were developed in the way it was conceived of by the Applebaum-Hébert Committee. Grants for capital projects, archives education and training programs, publications, research and development in the conservation field, exhibitions of archival documents, important acquisitions in the field of, for example, Canadian literary manuscripts or sound and moving images, could be all covered under the imaginative structure proposed.

We see, in the National Archival Records Commission, a long-awaited solution to the problems of building a viable archival network in the whole of Canada rather than a monolithic structure centered in one spot or a number of decentralized units competing heavily with each other. We hope, therefore, that all levels of federal and

provincial support will be given to the proposed structure and that it will be able to develop the leadership and important role envisaged for it. We are enthusiastic about the great potential role for the National Archival Records Commission.

In addition to the two recommendations of a Heritage Council and a National Archival Records Commission, there are other recommendations which the ABCA would like to support. We are in agreement that a suitable building should be provided for the Public Archives of Canada and would urge the minister to place that building very high on the list of building priorities. We feel that this is a significant recommendation which will have great importance in assisting the growth and leadership of the Public Archives of Canada. We feel that the Public Archives Act should be revised as soon as possible and strongly agree with the recommendation that the revision should be done in consultation with provincial and private sector archivists, including, we hope, associations representing regional archivists. We hope also that the Canadian Conservation Institute will, once again, be able to deliver services to regional areas and that it will be sufficiently funded to stimulate research which will support the conservation of historical documents.

We agree with the recommendation that the proposed Canadian Heritage Council should support initiatives to develop training programs in professional heritage management. Members of the Association of British Columbia Archivists lent their full support to the development of a graduate program in Archival Studies at the University of British Columbia and it is hoped that the initiatives proposed will strengthen that program as well as encourage others. We consider that it is of great importance that the graduates of programs of archival studies be considered by all archival institutions as suitable candidates for employment.

As many archival institutions benefit from the Canadian Cultural Property Export Review Board, we are pleased to support those recommendations suggesting that the grants appropriated for that Board should reflect the international market and that unspent balances from the appropriation be carried forward to succeeding fiscal years. One unsolved problem of the Board concerns its ability to deal equally with compensation through tax benefits to low income donors as well as high income donors. We feel this is a problem which regional archives frequently encounter.

We are somewhat concerned that, while the committee dealt with the problems of copyright with regard to authors, the serious problems, as outlined in our brief, for archives were not mentioned. We feel that this question will have increasing importance and impact on our work in the future and that failure to address the question soon may ultimately cause a problem for all heritage institutions.

In conclusion, we believe that the Federal Cultural Policy Review Committee has made some important and valuable recommendations for the future of archives in Canada and we hope that with the continuing consultation of all those concerned with our heritage — archival institutions in regions, professional associations and the federal government — we will be able to develop a strategy and coordinated plan which will prepare us for our cultural future.

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Toronto Area Archivists Group

The Toronto Area Archivists Group would like to thank the Honourable Minister of Communications for the opportunity to respond to the recommendations cited in the report of the Federal Cultural Policy Review Committee. We would like to applaud the committee's understanding of the archival community's concerns about the new Public Archives act and its endorsement of the concept of a National Archival Records Commission.

1. Towards the goal of a wider archival network, as outlined in the report, the Toronto Area Archivists Group is involved with various projects, which include the development of an archives course at George Brown College in Toronto, and in the publication of several guides both to archives collections and to archives in the Toronto area.
2. The Toronto Area Archivists Group would like to support the establishment of an arm's-length Canadian Heritage Council and is pleased that the archival community's interests will be considered by the proposed National Archival Records Commission which will be administered by the Heritage Council. We would suggest that any action plan relating to the council's relationship to the archival profession should be developed in consultation with archivists in every sector.
3. The Toronto Area Archivists Group is pleased that the committee members acknowledged and included in its recommendations the concerns of the wider archival community which has developed in Canada over the past ten years, outside the Public Archives of Canada. We realize that the report focuses on federal cultural policies and are pleased that the Committee sees the importance of promoting liaison among all levels of government and the private sector.
4. The members of the association would like to point out that while only Recommendations 29 and 30 have been related specifically to archives, Recommendations 15, 16, 18, 19, 20, 21, 23 to 27, 32 and 33 also apply to archival programmes and should be expanded accordingly to include those interests.

At present the majority of the recommendations in the "heritage" chapter appear to relate specifically to museums, not to "heritage" groups as a whole. We note the committee recognizes that archives covers the whole spectrum of the report since they are mentioned in several other chapters. In summary, we feel that the report presents a number of valuable recommendations which recognize the needs of the archival community and we would agree in principle with the majority of them. We feel that further clarification and discussion will be required as the recommendations are developed into policy. We would strongly recommend that policies, as they relate to archival matters, be developed in conjunction with the various members of the archival community both in the public and private sectors.