

CFLA Submission on Advancing AI Transparency in Canada

Submitted to Innovation, Science and Economic Development
Canada via email:

AIConsultations-ConsultationsIA@ised-isde.gc.ca

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Canadian Federation of Library Associations
Fédération canadienne des associations de bibliothèques
info@cfla-fcab.ca



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About CFLA-FCAB

The Canadian Federation of Library Associations (CFLA-FCAB) is the united, national voice of Canada's library community. Canadian libraries have the common mission of preserving and disseminating Canada's knowledge and heritage—a crucial component of an innovative, productive and forward-looking country. Our members also provide free access to the information and resources that many Canadians—especially those who face socioeconomic barriers—need to maximize their personal development and wellbeing and their contributions to the economy.

As the national voice of Canada's library communities, CFLA-FCAB works to advance library excellence in Canada, champion library values and the value of libraries, and influence national and international public policy impacting libraries and their communities.

The Government of Canada has identified five areas for consultation on AI transparency. CFLA's submission focuses on detecting and identifying AI-generated content and ensuring that individuals know when they are interacting with an AI system, areas in which libraries bring particular expertise in information, digital and AI literacy and informed public engagement. CFLA also emphasizes the need for consistent, understandable information about how AI systems are developed, what they can and cannot do, and how their design shapes the content they produce, as well as stronger mechanisms to trace AI activity, interactions and data provenance. Together, these measures are essential to evaluating AI-generated information, building public trust and supporting Canadian digital sovereignty by ensuring that AI systems used in Canada reflect Canadian contexts.

Detecting and Identifying AI-generated content

The public needs to be empowered so that they are able to identify the signals of AI-generated content. **Libraries need dedicated funding to develop programs to increase information and digital literacy among the public and students, to identify misinformation, disinformation and AI-generated content when it matters.**

In our work with the public, library staff recognize that it is likely impossible to train people to recognize AI-generated content. As tools improve, the indicators that identify AI-generated content continually change, and this identification will be beyond most peoples' skills. Public libraries are currently seeing AI use at extremes – individuals either use AI for everything, or want to reject using it entirely.

Instead of training people solely to identify AI-generated content, the Government of Canada should support efforts to teach people information and digital literacy so that they can recognize signals of misinformation and disinformation and strengthen their critical thinking skills.

Every day libraries deliver training on information and digital literacy across Canada in public libraries, universities, schools and other public institutions. Libraries are well positioned to expand into AI-related training, and many have already started to do so.

Through our existing public institutions, the Government of Canada can reach newcomers, youth, parents, seniors and those who are most vulnerable to harm. It is also important that this training be delivered in non-technical language. While we recognize that the Government of Canada and the National AI Literacy Initiative in partnership with the Alberta Machine Intelligence Institute aims to provide free and practical learning opportunities to help Canadians understand AI and use it responsibly, we feel that libraries would be excellent partners in administering, guiding and supporting access to this training.

Building this capacity among library staff and supporting the distribution of these programs with a shared curriculum is possible, but, it requires dedicated funding as many libraries are already under-resourced, especially in rural and northern areas. Support for national efforts would ensure that the resources developed in large urban and research libraries or through associations can reach people served by rural and northern community institutions. Libraries in these areas can adapt the content for their regional situations, and scenarios, as well as creating supplementary content to support critical thinking and analysis to fight misinformation and create opportunities for dialogue.

Need for both visible watermarks and invisible metadata

AI-generated content should include both visible and invisible metadata. Visible metadata is necessary to reach the public. This should be brief and easy to identify. However, visible metadata alone is insufficient; data interoperability is also essential.

Invisible metadata is needed for system processing and in a business-to-business context. Invisible metadata can provide the information needed to enable appropriate processing by automated tools, which in turn can also improve the information quality used to train AI systems if AI generated content can be filtered out. Libraries have used metadata for decades when purchasing, cataloguing and lending library materials, in standardized formats such as MARC (MACHine Readable Catalogue record) in various formats (including binary file, XML, JSON, and MODS), Dublin Core and RDA (Resource Description and Access standard). Standards that libraries will use for identifying AI-generated content are being discussed by the International Federation of Library Associations Advisory Committee on Standards, and will be considered by committees that manage standards at national levels, including through Library and Archives Canada. The national and international committees for library bibliographic metadata standards can be viewed at:

<https://cfla-fcab.ca/en/bibliographic-metadata-standards/>

The issue of identifying AI-generated content is urgent in the publishing industry, including in libraries. Libraries across Canada are acquiring AI-generated content in print and digital formats, and while existing metadata systems have the capacity to indicate how AI has been used in the authorship and publishing process, this information is not being included in the metadata for the resource. The content producing industry, including book and journal publishers and the many digital intermediaries, should be identifying AI-generated content that is being sold and distributed to libraries, and they are not doing so. The quality of metadata coming from

the publishing industry is unreliable. This unreliable metadata compromises the quality of content delivered through Canada's libraries, particularly digital content licensed on an annual subscription basis.

This is not a problem that competition within will solve since the providers for library content often have exclusive rights to sell or licence the specific content from the author or rightsholder. The library must buy the content from the specific publisher or intermediary that has the licence to distribute that publisher's content digitally. The same digital content is rarely available from multiple suppliers.

In the academic community, AI generated content is appearing in research, including in journals that present themselves as peer-reviewed reliable sources. While the library sector is working to address metadata issues associated with content once we receive it, this process would be greatly facilitated by the publishing industry using the existing standards that identify AI generated content. We describe an additional approach to identifying AI-generated content below related to registration for ISBN or ISSN – International Standard Book Numbers and International Standard Serials Numbers.

The content creator and the content publisher must be responsible for disclosing when a work contains AI-generated content. The standardization of labels and the practice for identifying content would be helpful, but it must be specific enough to include different situations and scenarios such as declaring when content is: assisted by AI, completely generated by AI or involved no use of AI such as Martine Peters logos <https://mpeters.uqo.ca/en/logos-ai-en-peters-2023/>., Libraries cannot fill this gap alone; all parties must do their part.

Tiered Approach to Identification

Identifying whether something is AI-generated is more important when users are making a decision that affects their lives or affects others, and less important when they are seeking entertainment. Information generated by AI that is likely to be used in the context of decision-making should be identified and accompanied with appropriate cautions about the accuracy and reliability of the information provided. It would be most effective if developers provided built in tools for users and consumers to identify and check if content is AI generated, such as with Google's SynthID.

For example, if the content is about what to do as a wildfire approaches your home, it is important to understand that information may be AI-generated and less accurate. It is less important to know if an AI-generated image was used by your friend to create a meme for entertainment on social media.

As an example of the problem, recently a hospital patient resource centre in Quebec purchased a cookbook for people living with diabetes. Upon receiving the cookbook, the staff determined that it appeared to be machine-translated, as it contained inaccurate information and used words like "lubricant" instead of "oil". When content created by an AI system is to be used in a manner that will likely affect someone's health, this fact should be indicated.

Identifying that content is AI-generated is also valuable for creators. Since content generated completely by an AI system is not subject to copyright in Canada, other creators are free to reuse the content to create new works that build on an existing AI-generated work. Audio visual content was also identified as a priority for identifying AI generated content as the potential for deepfakes and fraud are a threat to personal security.

Explore using the existing ISBN and ISSN systems to require disclosure

ISBN and ISSN Canada are part of Library and Archives Canada, which is within the federal government. This department is responsible for issuing an identifying number (the ISBN) to new books and new editions of books and (the ISSN) to serial publications. With the advent of AI-generated content, low-quality AI-generated books and serials are flooding the marketplace. CFLA suggests that Library and Archives Canada receive resourcing to explore the potential to use the ISBN and ISSN systems in Canada as a mechanism to require disclosure of AI-generated content. Solutions should be explored with the participation of the publishing industry.

Empowering Individuals to know when they are Interacting with an AI system

Within Canada's libraries, users encounter AI systems in layers. A library may have a service chatbot that depends on AI, and licensed digital content subscriptions from publishers and intermediaries may also each have their own chatbot. While the library has no insight into the functioning of the vendor-provided chatbot, the library user will hold the library responsible for their interactions. Vendors may not clearly inform libraries about the vendor's data storage and collection processes, which creates an additional risk to the library and the users. As businesses are now being held accountable for the information that AI chatbots provide, more transparency will be critical about the scope of service and the kinds of training data that an AI system is using. There needs to be transparency about when a user is interacting with these systems in order for the user to provide informed consent to continue the interaction. Additionally, AI agents should not be the ultimate replacement for all services, and there should be an option to allow for a person to still interact with a real human, especially in sensitive situations that include health, employment or finance.

Legislative provisions must be protected from contractual override

Any regulation that arises over time from the government related to AI-generated content will have no impact if private contracts and terms of use can supersede the terms of the legislation. As Canada develops legislation and regulations associated with AI-generated content, it will be important to consider legislative terms that prevent contracts from over-riding the protections the government has established. In the context of copyright law, this type of legislative protection has been enacted in the United Kingdom, Singapore, Japan, France, Germany and Ireland. In addition to copyright law, privacy laws should also be considered, especially in regards to sharing private health information with AI or services that may include AI, or information that a

user thinks may be private but ends up being searchable or sharable publicly later or acquired by other entities without the user's informed consent.

As well, there should be consideration of restrictions for children regarding their use of AI as they are not as digitally literate, and in light of research showing that the use of AI in learning is increasingly causing cognitive offloading and cognitive debt and reducing the ability to think critically (see <https://www.media.mit.edu/publications/your-brain-on-chatgpt/>).

This legislation should be directed at developers of AI technology, however there also needs to be a regulating body that will ensure accountability and enforcement of this legislation.