



October 31, 2018

National Sciences & Engineering Research Council of Canada  
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re: **NSERC's new Research Partnerships Program**

To whom it may concern:

Thank you for the opportunity to provide comments on NSERC's new Research Partnerships Program, which we offer on behalf of Wildlife Conservation Society (WCS) Canada scientists. We submit these remarks following our participation in the NSERC Research Partnerships "engagement session" on Monday, October 15, 2018 held at Ryerson University.

**We strongly support the stated goals of the new Research Partnerships Program, including three of its four elements described on p. 1. The one element we are deeply concerned about is the stated commitment to only recognize some non-profits as partners. We particularly object to the exclusion of registered charities as collaborators whose financial contributions would be considered for the calculation of NSERC's contribution.**

Incorporated in 2004, WCS Canada ([www.wcscanada.org](http://www.wcscanada.org)) is a national conservation science organization focused on research, conservation, and policy. Our staff lead numerous comprehensive field programs across a number of sites in northern Canada. Topics include: bio-acoustic monitoring of marine mammals in the Canadian Arctic, identifying priority areas for large-landscape conservation, predicting future impacts of white-nose syndrome for multiple bat species in western North America, contrasting lake sturgeon movements and ecology in dammed and undammed watersheds, evaluating cumulative effects of various future scenarios of climate and land use change in intact boreal landscapes, and wolverine ecology in managed forest habitats.

WCS Canada principal investigators hold Ph.D.'s, publish in the peer-reviewed literature, hold adjunct professor positions at several Canadian universities, and are actively engaged in various policy issues. Moreover, the graduate and post-graduate studies of several of our scientists was made possible through an Industrial NSERC with a non-profit organization.

A key part of our mandate also extends to training the next generation of conservation scientists. We have a graduate research fellowship program that has been running since 2009,

several of our scientists co-supervise graduate students at some universities, and we host interns (including from NSERC programs like CREATE) and numerous post-doctoral positions.

Our work benefits from the many and diverse partnerships we have with academic scientists across North America. However, WCS Canada lost our qualification as an NSERC “industrial partner organization” in December 2012, when the policy was suddenly changed to exclude not-for-profit organizations. Although we were at first encouraged to see the recent announcement of a new NSERC research partnership program, we were immediately disappointed to find out that highly-qualified organizations such as ours will remain ineligible in the calculation of NSERC’s contributions in the future Research Partnerships Program.

NSERC offered no explanation for the sudden exclusion of non-profit organizations in 2012 and provides none in this document for why registered charities should be excluded. We found out from our side discussions with a senior NSERC official at the engagement session that there is a reluctance to “open the gate” to “too many” organizations.

We consider this fear to be unfounded for the following reasons:

- 1) NSERC’s proposed assessment of the “value added” of the partnership should already filter out inappropriate, ineffective, or unqualified partners, without the need for additional exclusions; and
- 2) The risk of having “too many” eligible partner organizations is almost certainly outweighed by the risk of overlooking organizations that would add significant value to NSERC partnerships and biasing the eligible pool against civil society organizations.

We applaud NSERC’s commitment, as stated in this draft document, to support multi-sectoral partnerships that aim to mobilize research results to increase the impact of research investments for the benefit of Canada. In addition, we are also very much in favour of prioritizing partnerships that have a significant value-added benefit to society.

We strongly agree with NSERC’s contention that the proposed adjudication process will help the Research Partnerships Program achieve its goals. However, we strongly disagree with the ongoing need to arbitrarily exclude certain categories of organizations. Not only is this unnecessary with a robust partnership assessment process, but it risks excluding worthy non-academic individuals and organizations that would add tremendous value to the program, including civil society organizations. For example, with respect to the statement on p. 3 that “the largest increase in funding for higher education R&D has been from the non-profit sector” over the past 10 years, has NSERC looked into the proportion that comes from registered charities? Our guess is that the contribution is substantial, with WCS Canada serving as a prime example.

We recommend that research partners be assessed not on the category the organization fits into, but on the research value of the proposed partnership, and the research potential and

credentials of the partnering organization. We strongly suggest removing registered charities from the list of ineligible partners in Table B, if the table is to remain at all.

We would be delighted to discuss any of the points we have raised in this letter further with you, and look forward to hearing a response to our concerns.

Yours sincerely,



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