

To: Renate Behrens, Chair, RDA Steering Committee
CC: Anne Welsh, RSC Secretary
From: Chris Holden, Technical Team Liaison Officer
Subject: Technical Working Group's Formal Response to RSC/NARDAC/2025/3 –
Inconsistency in the transcribed manifestation elements related to source of information

The Technical Working Group appreciates NARDAC's work in attempting to make clear the options for transcribing data in official RDA. However, the group disagrees with some of the premises of the proposal.

Official RDA attempts to distinguish information taken from the manifestation being described from information taken from other sources. The **Manifestation: manifestation statement** element, and its narrower elements, are constrained to only transcribed data, and are listed as the first option in all the “statement” elements [listed in the data provenance section](#) quoted in the proposal. These “statement” elements were included in Official RDA for legacy purposes, but their conflation of recording and presenting data make them increasingly incompatible with the benefits of a digital environment.

Additionally, the Technical Working Group does not think referring to Original RDA 2.2.4 is pertinent in this context. While these labels may have been grouped together in Original RDA, Official RDA was developed in a post-LRM environment. The listed elements may share the same labels as those in Original RDA, but that does not mean these elements should necessarily be grouped together. Some of these are shortcut elements (e.g., [name of manufacturer](#)), some of these have a range of nomen (e.g., [title of series](#)), while others are attribute elements (e.g., [other title information of series](#)).

The proposal states:

We recognize that elements that now have a range of Nomen are the relationship element version of what were previously also transcribed elements. However, we are puzzled by the inconsistency of the inclusion of the option with some Manifestation transcription elements, but not others.

This is an oversimplification. The 3R project was more nuanced than simply taking all “transcribed elements” in original RDA and transforming them into elements with a range of nomen. Many of the inconsistencies the proposal notes are deliberate, and are due to a number of different kinds of subelements being used in a string of a “statement” superelement. The 3R project worked to shift most display options to string encoding schemes.

The issues raised by the proposal arise from community desire to retain legacy statement elements that offer a standardized presentation of information that may or may not be transcribed, or exist as some combination of transcribed and non-transcribed information (e.g., a publication statement in which the date of publication is transcribed from the manifestation, but the name of publisher and place of publication are taken from an outside source of information). This scenario is complicated because, as noted, these statements are superelements composed of various subelements, and the subelements may bear few similarities with one another other than sharing the same labels as elements that were grouped together in Original RDA.

The group also disagrees with the assertion that this proposal will simplify the work of the policy statement writers. Some institutions, such as the National Library of New Zealand, have already crafted policy statements directing catalogers where they need to look in the Toolkit for guidance on the source of the metadata. If the proposed changes are implemented, such work would need to be revised and policy statements possibly rewritten. Presentations from the National Library of New Zealand demonstrate that catalogers can currently navigate to the required elements and data provenance sections in Official RDA as written, with proper policy statements. By its very nature, RDA is not going to provide a linear set of instructions for the application of every element.

Finally, the group disagrees with the proposals to add the option to the soft-deprecated elements. While we acknowledge that these elements are being used by some communities, current RSC policy is that the soft-deprecated elements should not be further developed. The future “parallel” elements listed in the proposal will soon be discussed in an upcoming Discussion Paper from the Technical Working Group, and we think it best to adhere to current policy to not develop these elements until their future has been decided.

We are not unsympathetic to the desire to provide clarity for the source of information for the subelements of the “statement” superelements. However, instead of amending the available options for these subelements, we think a better way forward might be to provide contextual, illustrative examples in the Official RDA Toolkit to show how RDA can be used to achieve the desired aims of the proposal. Additionally, this may be an issue for the future String Encoding Schemes Working Group to consider because, as stated, Official RDA has largely shifted discussion of the display of elements (including statements) to string encoding schemes. Discussing these aims within the context of string encoding schemes may be more fruitful than attempting to make legacy elements function in the post-LRM world of Official RDA.

Specific thoughts on Recommendation 1:

The overall intention of official RDA is to clearly distinguish data values taken from the manifestation (or item) being described from values supplied by a cataloguer using other sources of information. Recommendation 1 of the proposal negates this intention.

As stated in the proposal, the option to take information from outside the manifestation itself is already allowed for many elements via the guidance present on their broader elements. The exceptions are:

- The statement of responsibility elements. Here there is a tension between the idea that the statement of responsibility is a transcribed statement of how the manifestation describes itself, and the legacy role of the element as a note on the work/expression. It's unclear how this tension can be resolved within Official RDA; a note on the creator responsible for the work or expression that is not transcribed from the manifestation is not a manifestation element. Possible solutions would involve looking at string encoding schemes for the statements in which statements of responsibility play a role, or using policy statements (some current policy statements already point the cataloger to the proper data provenance section for recording information taken from outside the manifestation itself).
- The series elements. There is a larger conversation about these elements currently happening in the Technical Working Group based on some concerns brought to the group's attention.
- The shortcut elements. Here, one cannot look at the broader element for guidance (For example, **Manifestation: name of agent of manifestation** is not a narrower element of **Agent: name of agent**, because they have different domains). One solution might be to add guidance to apply the instructions of a similar element. Guidance could be added to **Manifestation: name of agent of manifestation** that says "Apply the instructions for **Agent: name of agent**", which include the option to use any source of information.

Specific thoughts on Recommendation 2:

Recommendation 2 states "*It seems odd that the Data provenance chapter contains this rather elaborate guidance but it is never referred to from the transcription elements where it would be applied.*"

The cited guidance is intended for use in application profiles and is based on legacy instructions. It is referenced in the guidance on Recording an unstructured description, in the Data provenance subsection. Thus all unstructured descriptions reference this guidance in the intended RDA context.

Additionally, the data provenance section for nearly every element listed in the proposal has the following option:

OPTION

Record a *source of information*. For general guidance, see Guidance: Data provenance. [Recording a source of metadata](#) .

The guidance includes a section for when the source of metadata is the manifestation being described, and a section for when it is another source of information other than the manifestation being described. There are already existing policy statements for many of these elements that refer to the possibility that the source for the element may be taken from outside the manifestation being described, and some of the policy statements even point to the Data provenance guidance directly. Because of this, the group does not find Recommendation 2 to be necessary.

Recommendation 1. Add the option “Use any source of information” following Recording an unstructured description to all manifestation transcription elements that lack the option.

Disapprove. The Technical Working Group believes this muddles RDA’s distinction between data transcribed from the manifestation being described, and data taken from another source. The group thinks this issue is best solved through the development of string encoding schemes or policy statements.

Recommendation 2. Add as the first option to choose a source of information following the guidelines under Data provenance following Recording an unstructured description in all manifestation transcription elements

Disapprove. The Technical Working Group believes that these changes are unnecessary, and the Toolkit already makes it clear that the Data provenance guidance should be followed for unstructured descriptions. Policy statements can be added if desired to direct catalogers to this section.