



**PRE-BUDGET SUBMISSION TO THE HOUSE OF COMMONS STANDING
COMMITTEE ON FINANCE**

AUGUST 2021

Recommendation 1: That the government of Canada establish the Equitable Access to Reading Fund: a dedicated fund to support issues of equitable access to reading materials in Budget 2022.

Recommendation 2: That the Government of Canada ensure funding for the Equitable Access to Reading Fund include annual funding of at least \$6 million and that funding growth be tied to the consumer price index.

Recommendation 3: That the government of Canada ensure that funding be restored to CELA and NNELS for 2022-2023 and 2023-2024 to the previous funding level of \$4 million for CELA (\$3 million annually) and NNELS (\$1 million annually) to ensure services for those with print disabilities can be provided during a transition to an Equitable Access to Reading Fund.

Introduction

On behalf of the Centre for Equitable Library Access (CELA) and the BC Libraries Co-operative (BCLC) this submission is regarding ensuring long term funding for the production and distribution of accessible reading materials in Canada.

CELA and the National Network for Equitable Library Services (NNELS), which is a project of the BCLC, are national not-for-profit organizations that provide accessible reading services to the approximately 3 million people across Canada with print disabilities.

CELA and NNELS provide a critical and necessary public service to ensure equitable access to reading for those with print disabilities.

Print disabilities encompass those who are blind or visually impaired, people with cognitive disabilities such as dyslexia and those with physical disabilities that make it difficult to read a physical book. These services ensure that people with print disabilities across the country are more able to fully participate in learning, work and community life and contribute to the social, cultural, and economic development and success of their local communities and Canada as a whole.

2020 Fall Economic Statement

The federal government's 2020 Fall Economic Statement (FES) included an announcement that current annual funding of \$4 million for CELA (\$3 million annually) and NNELS (\$1 million annually) to provide material to those across Canada with print disabilities would be reduced by \$1 million annually beginning in 2021 before ending entirely in 2024-2025.

After concerns about the FES funding cuts were raised by CELA and NNELS (as well as users of their services and representatives of the publishing industry) funding for 2021-2022 was restored. The additional one-year funding reprieve in funding for 2021-2022 was welcome, but currently, both organizations face a 50% federal funding cut for each of the next 2 years before receiving \$0 by 2024-2025.

Transition Towards Industry-Based Production and Distribution

The federal government's move towards industry-based production and distribution of accessible reading materials to people with print disabilities across Canada will not replace the important service that CELA and NNELS provides.

A transition to industry-based production and distribution is NOT a sustainable and comprehensive long-term strategy for equitable access to reading for people with print disabilities in Canada. Moreover, the Canadian publishing industry, as represented by Kate Edwards, the Executive Director of the Association of Canadian Publishers (ACP), also agrees that "the private sector cannot assume responsibility for producing accessible books in the

myriad formats required to equitably serve Canadian readers with print disabilities.” Though the transition to industry is a critical and necessary piece of the puzzle, it will never replace the services organizations like CELA and NNELS can provide to fully meet the diverse reading needs of people with print disabilities. CELA and NNELS offer an essential national public service to ensure equitable access to reading and this service operates in conjunction with industry-based solutions. Both industry and public service components are essential to a healthy reading ecosystem in Canada and to a just and equitable society.

In addition, organizations like NNELS and CELA provide ongoing assessment, evaluation, training and awareness among the different stakeholders, including publishers, distributors, technology vendors, libraries and others to maintain an equitable reading landscape.

To ensure access to this content, organizations like NNELS and CELA are critical for the production and delivery of equitable access to reading material. These vital services, which promote the full participation of Canadians with print disabilities in learning, work and community life, can not be provided without federal funding support.

Budget 2022

CELA and NNELS are seeking a long-term funding solution by recommending that the federal government establish a dedicated fund to support issues of equitable access to reading materials which should be known as the Equitable Access to Reading Fund. A dedicated fund must be focussed on the needs of the print disability community across Canada and ensuring that they have access to reading material in multiple accessible formats and that the fund contributes to their ability to fully participate in learning, work and community life.

By focussing on the needs of those with print disabilities rather than on the ability of publishers to provide products in all accessible forms, the government can ensure that access requirements can be met.

The Equitable Access to Reading Fund, dedicated to the equitable access to reading materials, should be founded on the following principles:

- **Ensure that all content can be made accessible to a diverse community of people with print disabilities.**

It is estimated that only 7-10% of the world’s published content is available in accessible format(s). Canadian and multinational publishers can not (and will not be able) to ensure that all titles will be commercially available in all accessible formats.

- **Recognizing that people with print disabilities face economic and social barriers that industry-based production and distribution will not be able to fully address.**

A publicly-funded service needs to be provided to those users who do not have the economic means to gain access to accessible content.

- **Support for multiple formats, including braille, is essential for an equitable reading landscape.**

Many accessible formats, such as braille, are not viable formats in the marketplace, and publicly-funded services such as NNELS and CELA are needed to ensure equitable access to all formats.

- **Access to published works for people with print disabilities internationally through the Marrakesh Treaty should be facilitated by organizations that are independent from industry.**

The federal government has a responsibility to fulfill the requirements of the Marrakesh Treaty and must be prepared to continue to fund organizations, like CELA and NNELS, that currently perform this essential service.

- **Accessibility expertise and equitable reading must be supported and made available independent of market forces.**

Organizations like CELA and NNELS have expertise in accessible reading content and can ensure that these services and issues continue to be at the forefront.

- **Mainstream reading systems, tools, and devices can be complicated and expensive, and support for the provision of accessible services will continue to be essential.**

Both CELA and NNELS offer a repository of reading content for people with print disabilities that provide an essential accessible national reading service.

CELA and NNELS ask that establishing the Equitable Access to Reading Fund be a government priority in the 2022 federal budget.

Recommendation 1: That the government of Canada establish the Equitable Access to Reading Fund: a dedicated fund to support issues of equitable access to reading materials in Budget 2022.

CELA and NNELS further recommend that the new Equitable Access to Reading Fund be set at a level of at least \$6 million annually to ensure the needs of those with print disabilities can be met and that funding growth be tied to the consumer price index. The growth in funding will help ensure eligible service providers - including CELA, NNELS and potentially others - to expand services as required and to ensure equitable access to reading in Canada. We do not foresee the Equitable Access to Reading Fund replacing existing funding available to the publishing community. To be clear, the focus of Equitable Access to Reading Fund should be for accessible reading service providers rather than publishers.

Recommendation 2: That the Government of Canada ensure funding for the Accessible Reading Fund include annual funding of at least \$6 million and that funding growth be tied to the consumer price index.

Transition Funding

Both CELA and NNELS understand that the establishment of a dedicated fund and putting out a call for funding proposals from qualified groups will require significant due diligence on the part of federal officials. To ensure that those who require access to accessible reading products do not suffer during a transition to a new funding program and model, CELA and NNELS recommend that funding for the fiscal years 2022-2023 and 2023-2024 be restored to the previous funding level of \$4 million for CELA (\$3 million annually) and NNELS (\$1 million annually).

Recommendation 3: That the government of Canada ensure that funding be restored to CELA and NNELS for 2022-2023 and 2023-2024 to the previous funding level of \$4 million for CELA (\$3 million annually) and NNELS (\$1 million annually) to ensure services for those with print disabilities can be provided during a transition to an Equitable Access to Reading Fund.

Conclusion

CELA and the BCLC appreciate the opportunity to make this submission to members of the Finance Committee. We are available to respond to your questions at your convenience.