



**STANDING COMMITTEE ON FINANCE
PRE-BUDGET CONSULTATIONS IN ADVANCE OF THE 2023 FEDERAL
BUDGET**

**SUBMISSION
AUGUST 19 2022**

Recommendations

Recommendation 1: That the Government of Canada ensure the Equitable Access to Reading Program is only made available to Canadian not-for-profit organizations and at least 75% of these funds should be supplied to those groups that can provide national accessible reading services in both official languages to people with print disabilities across Canada and who have proven capacity and expertise to deliver on these services.

Recommendation 2: That the Government of Canada ensure the Equitable Access to Reading Program is founded upon the following key principles:

1. All content must be made accessible to a diverse community of people with print disabilities.
2. People with print disabilities face economic and social barriers that industry-based production and distribution will not be able to fully address.
3. Support for multiple formats, including braille, is essential for an equitable reading landscape.
4. Access to published works for people with print disabilities internationally through the Marrakesh Treaty should be facilitated by organizations that are independent from industry.
5. Accessibility expertise and equitable reading must be supported and made available independent of market forces.
6. Mainstream reading systems, tools, and devices can be complicated and expensive, and support for the provision of accessible services will continue to be essential.

Recommendation 3: That the Government of Canada ensure that funding to CELA and NNELS be maintained at current levels [\$3 million annually for CELA and \$1 million annually for NNELS] to ensure services for those with print disabilities can be provided during a transition to an Equitable Access to Reading Program.

INTRODUCTION

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

NNELS and CELA offer a critical and necessary public service to ensure equitable access to reading for those across Canada with print disabilities. Print disabilities encompass those who are blind or visually impaired, people with comprehension disabilities such as dyslexia and those with physical disabilities that make it difficult to read a physical book. The services provided by NNELS and CELA ensure that people with print disabilities across the country are more able to fully participate in their community and contribute to the social, cultural, and economic development and success of their local communities and Canada as a whole.

OVERVIEW

Budget 2022 allocated \$7 million/year for 3 years starting in 2024-25 to launch a new Equitable Access to Reading Program (EARP). This is a decision that both CELA and NNELS strongly support and specifically sought in our joint submission to the Standing Committee on Finance in advance of the 2022 Federal Budget.

It is critical that the approximately 3 million people in Canada that have print disabilities can access reading services and information, both in and beyond the marketplace, so that they can fully participate in society. Previous proposed models from the federal government proposed a solely industry-led solution for accessible reading materials but it is clear that such a model could not fully meet the needs of the community. The revised strategy, which includes the work funded under the EARP, is essential.

This submission provides CELA and NNELS's thoughts on the design and structure of the EARP to inform Committee members, the government of Canada and the public as the EARP is created.

STRUCTURE OF THE PROGRAM

NNELS and CELA understand that EARP funds will not be specific to any given organization. As such, it is important to outline what types of organizations are eligible under this program. We believe that the EARP should be available to Canadian not-for-profit organizations and that at least 75% of these funds should be supplied to those groups that can provide national accessible reading services in both official languages to people with print disabilities across Canada and who have proven capacity and expertise to deliver on these services. National accessible reading services provide an economy of scale that cannot be fully realized by other organizations. Essential as well to the program, is the encouragement of innovative partnerships with organizations across the landscape. The remainder of the funds may be used

for other organizations who can participate regionally or at a smaller scale in providing service in this sector that will complement the work of the national accessible reading services. For all organizations, it is essential that the work and services funded are informed by people with print disabilities.

Recommendation 1: That the Government of Canada ensure the Equitable Access to Reading Program is only made available to Canadian not-for-profit organizations and at least 75% of these funds should be supplied to those groups that can provide national accessible reading services in both official languages to people with print disabilities across Canada and who have proven capacity and expertise to deliver on these services.

KEY PRINCIPLES OF THE EQUITABLE ACCESS TO READING PROGRAM

The EARP should be founded on 6 key principles. Together, these areas demonstrate the scope and breadth of work to be funded under the new program; work that is essential for those with print disabilities to fully participate in learning, work and community life.

The key principles are as follows:

1. All content must be made accessible to a diverse community of people with print disabilities.

It is estimated that less than 10% of published works in developed countries and less than 1% in developing countries are ever made into accessible format(s). An EARP must ensure that material, including that from multinational and international publishers, is available to a wide array of communities – including new Canadians and indigenous populations.

The flexibility of format and distribution choice ensures an equitable landscape for people with disabilities. Ongoing support for alternate format production of material that has not been published in a born-accessible format remains essential. This can include backlist titles, grey matter, titles from smaller publishers, government publications and more. Alternate format production must also encompass a diverse choice of distribution channels to readers across Canada, using both physical and digital methods.

2. 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. The service encompasses use of all the collections of accessible content including those that offer, amongst other services, format and distribution choice, training on accessible reading technologies and digital

literacy, helping users navigate the digital divide, and providing information, support and, in some cases, appropriate hardware and software for reading.

3. 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, like those currently provided by CELA and NNELS, are needed to ensure equitable access to all formats. There is an ongoing need for support for multiple accessible formats, such as braille and human-narrated audiobooks, in addition to the born-accessible ebooks created by publishers. Different users need different formats so it is essential that multiple accessible formats continue to be offered to readers depending on their preference.

4. 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 fulfil the requirements of the Marrakesh Treaty and funding provided through the EARP would ensure Canada is meeting its obligations. Organizations such as NNELS and CELA are integral to facilitate the exchange of accessible material across borders. Support for technological development is essential to ensure efficient and timely exchange of material.

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

An EARP must ensure that organizations, like CELA and NNELS, which have expertise in accessible reading content are funded and able to ensure that these services and issues continue to be at the forefront.

Accessible reading expertise goes beyond just offering accessible content for reading: this program should also ensure that accessibility knowledge and expertise as it relates to literacy and reading continues to grow. It is also essential that the knowledge and expertise of people with lived experience with disabilities, as well as other intersectional identities, are an integral and significant part of the work. Also essential is ongoing user research and understanding of the reading needs of people with disabilities.

Industry cannot lead this work as there will always be marketplace priorities that will override the needs and interests of people with disabilities, especially those that face additional barriers, including economic status, demographic or gender identity. It is essential that work in this area is carried out independent of the marketplace.

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

An EARP must ensure that organizations that offer a repository of reading content for people with print disabilities can continue to provide a robust and forward-thinking accessible national dedicated reading service. NNELS and CELA already offer repositories of accessible reading material to those with print disabilities, and these repositories, including the technological infrastructure, need to be supported at the federal level for their sustainability and growth. These repositories are currently partially supported at the Provincial and Territorial level, and, in some cases, the individual library level, but that support needs to be augmented at the federal level to ensure equitable access across the country and to ensure the ongoing technological maintenance and innovation for discovery and delivery of the content.

Recommendation 2: That the Government of Canada ensure the Equitable Access to Reading Program be founded upon the following key principles:

- 1. All content must be made accessible to a diverse community of people with print disabilities.**
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BUDGET 2023

As noted above, CELA and NNELS believe the EARP, can provide a long-term funding solution by establishing a dedicated fund to support issues of equitable access to reading materials. The EARP would be focussed on the needs of people with print disabilities 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.

Transition Funding

Both NNELS and CELA understand that the establishment of the EARP will require significant consultation and work by federal officials. To ensure that accessible reading services do not

suffer during a transition to a new funding program and model, NNELS and CELA recommend that existing annual funding for NNELS and CELA be maintained at current levels until the EARP is operational.

Recommendation 3: That the Government of Canada ensure that funding to CELA and NNELS be maintained at current levels [\$3 million annually for CELA and \$1 million annually for NNELS] to ensure services for those with print disabilities can be provided during a transition to an Equitable Access to Reading Program.

CONCLUSION

We appreciate the opportunity to provide this submission to Finance Canada and are available to discuss the recommendations at your convenience. For further information please contact Kevin Millsip at kevin.millsip@bc.libraries.coop or Laurie Davidson at laurie.davidson@celalibrary.ca .