



STANDING COMMITTEE ON FINANCE
PRE-BUDGET CONSULTATIONS IN ADVANCE OF THE 2024 FEDERAL
BUDGET

SUBMISSION
AUGUST 4, 2023

RECOMMENDATIONS

Recommendation 1: That the Government of Canada ensure that funding to NNELS and CELA be maintained at current levels [\$1 million annually for NNELS and \$3 million annually for CELA] in 2024-2025 and until such time as the Equitable Access to Reading Program is fully operational to ensure that that accessible reading services, and their users, do not suffer during a transition to the new funding program and model.

Recommendation 2: 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 nationally 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 3: That the Government of Canada ensure the Equitable 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.

INTRODUCTION

The National Network for Equitable Library Services (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 cognitive 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 NNELS and CELA 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. Previously, suggested models from the federal government proposed a solely industry-led solution for accessible reading materials, but such a model could not fully meet the community's needs. The revised strategy, which includes the work funded under the EARP, is essential.

This submission provides NNELS and CELA'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.

1. TRANSITION FUNDING

As noted, NNELS and CELA fully support the development of the Equitable Access to reading Program (EARP). Both organizations have participated in discussions with ESDC officials in the Office of Disability issues about the design of the EARP and our thoughts on this design are provided within this document.

Until such time as the EARP is fully operational and able to provide funding to qualified organizations, it is essential that current funding to both NNELS and CELA continue at their

existing funding levels [\$1 million annually for NNELS and \$3 million annually for CELA]. This will ensure that accessible reading services, and their users, do not suffer during a transition to the new funding program and model.

Recommendation 1: That the Government of Canada ensure that funding to NNELS and CELA be maintained at current levels [\$1 million annually for NNELS and \$3 million annually for CELA] in 2024-2025 and until such time as the Equitable Access to Reading Program is fully operational to ensure that that accessible reading services, and their users, do not suffer during a transition to the new funding program and model.

2. STRUCTURE OF THE PROGRAM

NNELS and CELA understand that the EARP funds will not necessarily be specific to any given organization. As such, it is important to outline what types of organizations are eligible under this program. This recommendation has been provided to ESDC's Office of Disability Issues as part of their consultation on the EARP.

The EARP should only be made available to Canadian not-for-profit organizations. Further, we recommend that at least 75% of these funds should be supplied to those groups that can provide nationally accessible reading services in both official languages to people with print disabilities across Canada and who have proven capacity and expertise to deliver 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 could be used for other organizations that can participate regionally or at a smaller scale in providing service in this sector that will complement the work of the nationally accessible reading services. For all organizations, it is essential that the work and services funded are informed by people with print disabilities.

Recommendation 2: 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 nationally 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.

3. KEY PRINCIPLES OF THE EQUITABLE ACCESS TO READING PROGRAM

The EARP should be founded on six key principles. Together, these areas demonstrate the scope and breadth of work to be funded under the new program, which 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.

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 NNELS and CELA, 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 CELA and NNELS 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 NNELS and CELA, 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. CELA and NNELS 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 3: That the Government of Canada ensure the Equitable 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.**
- 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.**
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- 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.**

CONCLUSION

We have appreciated the opportunity to provide this submission to members of the Finance Committee and are available to further 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 .