

COMMISSION STAFF WORKING PAPER

Strengthening the Competitiveness of the EU Publishing Sector

The role of media policy

Response by the European Blind Union (EBU)

1. Introduction

1.1 The European Blind Union (EBU) wishes to submit some brief comments on this staff working paper.

1.2 EBU is a non-governmental and non profit-making European organisation founded in 1984. It currently has 44 member countries, each represented by a national delegation. EBU aims to protect and promote the interests of all blind and partially sighted people in its member countries. It is recognised and supported by the European Union as the leading European-level NGO for people with a visual impairment, and is affiliated to the European Disability Forum.

1.3 The detailed work of the European Blind Union is carried out by Standing Commissions and by Expert Working Groups, whose areas of activity reflect the major interests of EBU.

1.4 Its Commission on Liaison with the European Union is made up of representatives from all EU member states. That Commission has established a Working Group on Copyright and Publishing to reflect the importance of these areas to its members.

2. Summary of Response

2.1 We wish to underline to the Task Force that it is essential for the European publishing industry to focus on the accessibility of its content rather than solely on traditional forms of publication such as paper.

2.2 This is not only desirable from the perspective of promoting social inclusion, but also as a way of extending the industry's market reach.

2.3 We have not attempted to respond to the specific questions at the end of the paper, but rather to flag up some core issues which we would like the Task Force to absorb into its overall work.

3. The People

3.1 Within the European Union well over 10 million people have significant sight loss and are unlikely to be able to read standard newsprint. As the average age of the population rises, so will the numbers of people with impaired sight. Not all will identify themselves as "Blind" or "partially sighted", but they will only be able to access published material if its presentation is modified: enlarged, turned into audio or in some cases turned into a tactile form.

3.2 Blind and partially sighted people face enormous barriers in accessing knowledge and information, and the way in which the publishing industry works can have a profound positive or negative impact on the extent of this disadvantage.

3.3 If the European Publishing industry is to be truly inclusive, and reach the maximum number of readers, it must take full account of the needs of those for whom standard print and standard visual displays are inaccessible.

3.4 A very large number of people also suffer from cognitive impairments such as dyslexia and they, too, constitute a currently unserved market for alternative formats.

3.5 Thus it is in the commercial interests of publishers to be aware that not everyone can read print.

4. Convergence

4.1 Traditionally, publishers have served the market for print. Voluntary agencies have had to take up the needs of those who cannot read print. Most books and newspapers have remained inaccessible. A study in the UK conducted by the Library Information and Statistics Unit at Loughborough University on behalf of RNIB indicated that, by August 2004, only 4.6% of the titles added to the British National Bibliography from 1999 to 2003 had become available in any accessible format. Given that few people can read all “accessible “ formats, the proportion of published titles available to any individual with a sight impairment is even lower than this. People needing braille, large print or audio have also usually had to wait months or years after publication before being able to read books.

4.2 Thus the traditional model has failed.

4.3 Modern digital technology offers an opportunity to overcome this, to dismantle the social exclusion which has characterised the previous regime, and to reach new markets.

4.4 Publishing processes can and should from the outset foresee the creation of end products which can be read in a range of ways and on a variety of platforms. The industry should work in partnership with specialist agencies to help it adopt the most suitable standards and formats to achieve this. Government, industry and the voluntary sector should work in partnership towards an ultimate situation where books can be ordered through bookshops and libraries in the user’s desired format.

4.5 This is not the occasion on which to enter into technical detail. We recommend that the Task Force turn for expert advice to bodies such as the Daisy Consortium or the EUAIN Project, together with our own EBU Technology Working Group.

4.6 Some parts of the publishing industry are alive to the needs we have outlined. We have had constructive interaction in recent years with the Federation of European Publishers. There are also interesting examples of collaboration between the publishing industry and the voluntary sector in several member states.

4.7 In some cases, viable commercial business models can be established. For example, the concept of “large print on demand”, as an extension of existing print on demand services, is well

advanced in pilot stage. In other cases, government funding will be needed for some time to come to ensure the final publication in accessible formats of certain material, such as mathematical or scientific works. Even in this case, however, it is in the interests of the publishing industry to work as closely as possible to ensure that content is available in a useable format in advance of publication.

4.8 In the United States legislation (the Individuals with Disabilities in Education Act 2004) has been passed to set up a central repository and stipulate the format in which the text of educational material must be deposited there. This will give the American industry an opportunity efficiently to serve students with reading related disabilities. A fragmented European publishing industry may thus find itself at a disadvantage in the education sector.

4.9 We do not expect publishers to subsidise their readers. If particular end products are not commercially viable. The public sector has a duty to provide the required subventions. Nonetheless, it is in everybody's interests that the industry adopts the standards and procedures that will bring its products to as wide a readership as possible, at the same time and under the same terms and conditions.

5. Digital Rights Management

5.1 The European Commission has carried out a great deal of work since the promulgation of the Information Society Directive on digital rights management. DRM could be an enabler, ensuring that people with reading-related impairments are able to manipulate the presentation of content so as to be able to read it. There is, however, also the danger that technological protection measures within DRM systems can inadvertently act as a barrier to access by people with a reading related disability. It is in the interests of the publishing industry, as well as society at large, that this does not happen.

5.2 Previous work by DG Information Society has highlighted the importance from the consumer's point of view of interoperability and adequate protection of users' rights.

6. Conclusion

6.1 We recommend to the Task Force that, in reviewing the competitiveness of the European publishing industry, it views the needs of people with reading related disabilities as an integral part of its work; as an opportunity, not a constraint.

6.2 We look forward to future collaboration with the Task Force as its work unfolds.

6.3 For further information or clarification, please contact in the first instance David Mann, at the address below.

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Copyright and Publishing Working Group
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