



19 December 2022

Mary O'Kane

Chair, Australian Universities Accord

***Submission made via the Consultation Portal***

Dear Professor O'Kane

**RE: Consultation on Australian Universities Accord Terms of Reference**

The Australian Publishers Association (APA) welcomes the opportunity to provide feedback to the Australian Universities Accord Panel on the proposed terms of reference for the review of the Australian Universities Accord.

**Who we are**

The APA is the largest industry association of Australian publishers: we represent more than 200 publishers producing more than 90% of Australia's \$2 billion annual book industry and serial industry turnover. Overall, around 20,000 new Australian books and journals, of all kinds, are published each year. Many tens of thousands more international titles are released in Australian editions or imported into the Australian marketplace. The Australian book industry maintains the availability of more than 1.2m book and serial titles to serve the needs of Australian readers—including families, students, educators, researchers, and industry.

In particular, we represent a significant number of educational and scholarly publishers (local and international, large and small, general and specialized, print and/or digital, and for profit and non-profit) educational and scholarly publishers who have a significant impact in shaping the nation through the provision of materials to the higher education sector.

Australia's educational publishers create and sell textbooks, monographs and journals, print, digital and web-based resources that are highly regarded world-wide: It is our estimate that that Australian educational and scholarly publishers across all sectors produce

- 3000 new titles per annum
- Selling approx 9 million books and digital resources per year
- Between \$50 million and \$100 million of this is in the tertiary learning materials market and upwards of \$200m is in the journals market.

**Educational, economic and social contribution of Australian research materials and learning materials**

Textbooks, monographs, digital resources, and scholarly journals are key knowledge and learning resources for Australian researchers, academics and students. Such materials

- support the delivery of content in higher education and vocational training
- support research training in universities, and
- facilitate research and the communication of research

## Response to draft terms of reference

Given the contribution of learning and scholarly materials to Australian educational, economic, and civic life, it is important that the terms of reference for the review are interpreted in ways to allow consideration of access/equity for students in relation to learning materials, and the viability of tertiary, vocational, scholarly and journal publishers.

The educational publishing and scholarly publishing system is experiencing substantial disruption including

- changing expectations from universities and students about cost and access;
- changes to the structure of educational markets and with it publishing markets; and
- threats to viability of the production of new Australian learning content and knowledge content

In endorsing the breadth of the proposed terms of reference for the Accord Panel, the APA observes that the structure, viability, and deliverables of Australian publishers are relevant to a number of specific terms of reference:

### • Meeting Australia's knowledge and skills needs, now and in the future:

It is appropriate for governments and universities to see tertiary publishers as key partners in the delivery of content.

Educational publishers through the provision of quality Australian learning materials – and facilitating the publication of new Australian research – have a vital role in meeting knowledge and skill needs. The capacity of the publishing sector to continue to produce new Australian material needs to be considered. Future Australian nurses, teachers, STEM workers and business graduates need access to high quality Australian content.

Currently, some interests within the higher education sector misunderstand the relative responsibilities of university libraries and the roles of publishers. It is the responsibility of universities to procure materials with the appropriate rights and permissions and pay a fair price for their use. It is the role of publishers to make products available in multiple formats and through multiple channels to support that need.

Following attacks on the value of publishers by other interests in the higher education sector, there has been an erosion of publisher confidence in the market – which threatens to undercut investment in new Australian learning materials, scholarly publications, and research publications. In many curriculum areas, it is unviable to invest in any new local content. Reduction in investment in new Australian learning resources risks a situation where Australian students are learning from either lower quality locally produced amateur materials, or imported products, like they did in the 1950s.

Beyond commitments from university libraries to procure materials at appropriate prices and using appropriate licencing arrangement, publishers require timely advice about current and future student numbers. Our members require more up to date knowledge of student numbers by subject areas so they can forecast where to invest money and resources in local content. At the

moment, the only visibility on student numbers is the Department of Education's release which is 12-18 months after the fact.

• **Access and opportunity & Investment and affordability:** Reasonably enough, the government and the nation have an interest in all students receiving fair access to appropriate learning and scholarly materials. There is a shared educational interest that students have access to the materials they require. Accordingly, It is appropriate for there to be a discussion of how basic learning materials might be supplied to students via direct licence arrangements and statutory licence arrangements alongside traditional models of student purchase. New content needs to be funded. Likewise, older content needs to be revised.

• **Delivering new knowledge, innovation and capability:** Recent discussions led by the Australian chief scientist about the possibility of a national licence for materials published in journals underline the importance of facilitating access for students, researchers, government and industry to Australian and global research. The APA supports the continued investigation of national licencing schemes and commitment to the existing educational statutory licence schemes.

Should you require further information about the role, possibilities and issues facing Australian educational and scholarly publishers please contact us at the Australian Publishers Association.

Yours sincerely,



**Dr Stuart Glover**

Policy and Government Relations Manager

Australian Publishers Association