



Australian Publishers Association submission to the Universities Accord

PART A

Preamble:

The Australian Publishers Association (APA) welcomes the opportunity to contribute to the government's higher education review and to collaborate with universities to enhance learning outcomes and research communication.

Who is the APA:

The Australian Publishers Association (APA) represents more than 200 Australian publishers, who are responsible for producing over 90% of Australia's \$2 billion annual book industry turnover across various sectors. These sectors include higher educational publishers, scholarly and journal publishers.

Publishers are critical to bringing the best-prepared and researched works to the world. They research and commission accomplished authors to prepare meaningful and relevant manuscripts, and then use expert processes of selection, such as peer review, to make editorial improvements to enhance the value of these works. Additionally, publishers handle the production, promotion, distribution, and sale of these works. In some cases, they provide digital platforms to access works.

APA members produce works that span a wide range of genres—including digital, hybrid, and traditional print learning materials; print and digital journals; scholarly monographs, as well as trade publications. Overall, approximately 20,000 new Australian (print and electronic) books of all types are published each year, with many tens of thousands of international titles being released in Australian editions or imported into the Australian marketplace. Australian publishers ensure that over 1.4 million book and serial titles remain available to meet the needs of Australian readers, including families, students, educators, researchers, and industry professionals.

Educational and Scholarly Publishers as Learning, Research, and EdTech Leaders—and the current risks to production of Australian content

The Australian educational and scholarly publishing industry is diverse and includes multinational companies, small independent publishers, and those within universities (university presses). It plays vital roles in providing quality learning materials, scholarly works, and research publications that are essential for achieving educational outcomes, achieving value and driving change from research –and building a skilled workforce. While universities provide structure through lectures and tutorials, students learn primarily through their encounters with curriculum materials, whether digital or print – similarly while research always looks to the future it in part rests on the depth and integrity of the existing research record.

To enhance learning experiences and research outcomes, Australian publishers have embraced digital technology and offer e-books, interactive resources, and online courses. They also provide platforms and tools that help educators create custom content for students. However, the shift to digital and online resources has resulted in decline in the paid markets for Australian content, with unit sales being undercut by piracy and universities pursuing free access to third-party materials while charging higher student fees.

The scholarly publishing sector in Australia is also undergoing significant change, with a mix of independent and international publishers producing high-quality academic works, including monographs, edited collections, and academic journals. The widespread shift to 'gold' open access models provides a way forward for many publishers and universities to ensure timely and cost-effective access to the latest research.

However, these changes pose several risks for higher education providers. Students may face limited access to high-quality and locally originated resources, negatively impacting the quality of education. Struggling publishers may increase prices, making it harder for disadvantaged students to access necessary materials. A decline in publisher financial sustainability may also limit innovation in the sector, reducing the ability to adapt to changing needs and trends. Finally, a reduction in research impact may occur if publishers are unable to continue supporting research activities through the publication of academic journals and research materials.

Universities have an important role to play in leading the national debate on topics relevant to Australia based on evidence arising from research. Experts communicate through the publishing process to the wider community, contributing to the national conversation and adding to human knowledge. Some universities have presses that contribute to communicating research widely and publish content of high relevance to Australia that would not be published by other publishers.

The imprimatur (or kitemark as it is known in some places including the UK) of robust, trusted information that publishers bring is crucial in combatting misinformation and disinformation. Australian academic content is tailored to suit Australian standards, curriculum, and context in ways that international teaching and learning resources are not. Aboriginal and Torres Strait Islander knowledge and authors are one good example, where publishers have been able to publish textbooks by Aboriginal and Torres Strait Islander authors for Australian lecturers and students in important areas like nursing and midwifery and teacher education.

Publishers with their own proprietary platforms and other third-party digital suppliers offer a range of accessibility tools to boost demand and ensure that content is accessible to all. Ultimately, quality, locally produced learning materials and scholarly publications are critical for achieving educational outcomes, developing a skilled workforce, and promoting ongoing learning and professional development. Australian educational publishers welcome the opportunity for ongoing discussions about the place of learning resources and research communication in modern Australian education.

PART B: ANSWERS TO THE DISCUSSION PAPER'S SPECIFIC QUESTIONS

Q1 How should an Accord be structured and focused to meet the challenges facing Australia's higher education system? What is needed to overcome limitations in the current approach to Australian higher education?

As educational publishers, we acknowledge the ongoing changes in Australian higher education, including massification, internationalisation, and the incentivization of teaching and research performance within increasingly bureaucratized university structures.

The ongoing digital revolution in knowledge creation and access, teaching, and learning will bring further changes, such as the importance of skill acquisition replacing the importance of the mastery of bodies of fixed knowledge. We suggest that policy responses should be flexible and open to ongoing transformation, with a focus on access and equity, education quality and relevance, and funding and sustainability.

To create a more sustainable, innovative, and inclusive system for the future, we recommend increased investment, greater collaboration between universities and industry, and more emphasis on digital and online learning, along with regulatory reform. As content creators and facilitators, we are ready to work with the government, universities, and industry to address these challenges.

Q4 Looking from now to 2030 and 2040, what major national challenges and opportunities should Australian higher education be focused on meeting?

There are several priorities that need to be addressed in education, including meeting growing demand, maintaining quality, supporting accessibility, adapting to changing economic needs, enhancing research and innovation, and meeting the needs of an ageing population.

More specifically, publishers believe that in the next two decades, there will be significant changes in the modes of teaching and learning. While universities will remain essential, changes in staff ratios may result in students and researchers relying more on learning materials and scholarly materials created by publishers and other edtech providers. This shift may alter the role of universities and academic staff, and they should consider the changing role of third-party content providers in the future of education.

Publishers also believe that as the economy shifts from an extractive base to an emphasis on high skills and innovation, they can support capacity building among researchers and create new materials to build the skills and talent pipeline that Australia will need. In such a context, we welcome an ongoing dialogue with Australian universities about the future provision of published content.

Q5 How do the current structures of institutions, regulation and funding in higher education help or hinder Australia's ability to meet these challenges? What needs to change?

Publishers urge attention to the following regulatory issues:

- **Higher Education Support Act (HESA):** Publishers recommend reforming the HESA to ensure all students have access to the best third-party learning materials and scholarly resources. We believe that universities should allocate a minimum proportion of student fee income towards purchasing or licensing appropriate materials. Publishers also welcome incentives for universities to work with them to develop and implement learning materials and opportunities to share research and expertise with universities to inform their teaching practices.
- **Repositories:** Publishers note that repositories to a large extent replicate what publishers also (or already) do. The development of university-based repositories of staff research publications involves ongoing costs such as IT infrastructure, software development, staff training, and ongoing maintenance costs. Universities also need to allocate staff time to manage repositories, ensure compliance with copyright laws, and provide access to the repository's content. A collaborative framework might allow resources to be redirected: Publishers believe we can partner with universities in the development of

repository-like services. A national licence for published research may be a national and sector-wide response to national imperatives for access to high-quality published research in authorised formats.

- **Strong and Workable Copyright:** Publishers believe that protecting the rights of copyright holders is crucial for supporting creativity and innovation, rather than stifling it. Protection of all forms of intellectual property is fundamental to economic prosperity and innovation. Publishers support the Attorney General's proposed review of significant copyright issues such as orphan works, remote learning, and AI through a 'roundtable process', within the context of the Albanese Government's strong commitment to the importance of copyright to the interests of creators and the national interest in the recent new national cultural policy.

While some in the university sector advocate for US-style 'fair use' doctrines, which could conflict with Australia's long-standing commitment to the principles of 'fair dealing' in copyright law, publishers and universities share a common interest in facilitating access to current content for students and teachers at a reasonable cost. Publishers believe that industry-based ground rules for use are the best way to achieve this goal, rather than an exception model that discourages content creators. The uncertainty surrounding copyright and AI is of immediate concern.

- **Statutory education licence:** The commitment of universities in good faith to the use and workability of the education statutory licence in the higher education sector is crucial. This commitment includes appropriate monitoring of the use of learning materials by university libraries, students, and staff by both universities and the government. The collapse of the Canadian higher education publishing market due to unmeasured exploitation of the fair dealing exceptions highlights the risks of bad faith exploitation of the scheme. As modes of learning change in Australia, including an expansion of online teaching, the ground rules for the statutory licence must also change to ensure fair remuneration of creators and rights holders.

Q7 How should the mix of providers evolve, considering the size and location of existing institutions and the future needs of communities?

As technology changes and universities and students engage with learning materials in new ways, the role of educational publishers in the higher education sector is expected to evolve over the coming decades.

Already, educational publishers have expanded their offerings to include digital resources such as e-learning platforms and digital courseware to enhance the learning experience. One potential future role for educational publishers is to play a more active role in developing and delivering online and blended learning programs, partnering with existing institutions or other providers to offer flexible and accessible courses that meet the needs of diverse learners. Additionally, educational publishers

are positioned to leverage their expertise in content creation, digital tools, and instructional design to support the development of micro-credentials, up-skilling, and re-skilling programs that respond to the changing needs of the workforce.

We also emphasise that an important aspect of the publishing ecosystem is its diversity and range and note that this is something to be supported and not stifled. For example, as well as innovation in educational formats, we note the importance of new First Nations educational and trade content – and the importance, say, of Australian literary content being studied alongside overseas content in literary programs in Australian universities. Moreover, educational publishers could collaborate with institutions and other providers to develop customised learning solutions that cater to the specific needs of communities, including remote and underserved populations. This could involve working with local partners to identify gaps in the education and training landscape and developing tailored solutions that address these gaps.

In conclusion, it is essential to encourage innovation and diversity in the higher education sector, including leaving the door open to alternative providers such as publisher delivery of micro-credentials. The government's understanding of the role of third-party providers should evolve to align with the size and location of existing institutions and the future needs of communities.

Q8 What reforms are needed to promote a quality learning environment and to ensure graduates are entering the labour market with the skills and knowledge they need?

Publishers have noted that the increase in student enrollment over the past 35 years, along with changes in student-staff ratios and teaching contact hours, suggest that external provision of teaching and learning services by publishers – including learning resources and assessment services – will become increasingly important in the higher education market. Both the government and universities should embrace the potential benefits of this mixed model of learning service provision, including increased efficiency and improved quality of services.

At the same time publishers believe that course leaders (the teaching academics) should maintain course-level choice in the identification and setting of appropriate learning resources. This allows teaching (where possible) to be curiosity based and research driven.

Q10 What role should higher education play in helping to develop high quality general learning capabilities across all age groups and industries?

Higher education publishers seek to collaborate with government and universities to enhance the educational experience of students and improve the quality of teaching

and learning. We recognise crucial possibilities to support the development of high-quality general learning capabilities across all age groups and industries.

Firstly, the government can establish licensing arrangements to enable community and industry access to a wide range of educational resources, including textbooks, e-books, and digital learning materials. Such resources can help learners acquire essential skills and competencies without the cost of university enrolment.

Secondly, publishers encourage the government to pursue a national licence scheme for newly published research. This would facilitate community and industry access to the latest knowledge. However, to be sustainable these schemes must ensure appropriate remuneration for creators, researchers, and rights holders.

Moreover, higher education publishers can themselves provide various learning and teaching services to universities to support their students and faculty members. Publishers can collaborate with universities and subject matter experts to develop high-quality educational materials and resources tailored to the specific needs of students and faculty members. These can include textbooks, online courses, and other digital resources. Publishers can also provide learning management systems (LMS) to universities that allow faculty members to manage their courses and provide online resources and activities to their students. LMS can track student progress and provide analytics to help instructors improve their teaching.

Additionally, contemporary publishers offer professional development opportunities for faculty members to improve their teaching skills and stay up-to-date on the latest trends and best practices in education. These can include workshops, webinars, and other training sessions.

Finally, publishers can provide support services to help students succeed in their courses and prepare for their future careers. These can include study guides, test preparation materials, and career readiness resources.

Overall, higher education publishers can play a more significant role in providing learning and teaching services to universities, leading to a more skilled and educated workforce, as well as greater opportunities for innovation and progress in various fields.

Q11 How should Australia boost demand for people to study in the higher education system?

Location, time commitment, and cost-based barriers are significant obstacles for many people considering higher education in Australia. Higher education publishers can help to increase demand in several ways:

1. Developing high-quality learning materials: Publishers can work with educators and experts to create informative and engaging materials that are relevant to students.
2. Promoting lifelong learning: Publishers can produce accessible materials that promote learning and skill-building at all levels, from beginners to those looking to advance their careers.
3. Using digital technologies: Publishers can use interactive learning materials and explore new delivery methods to make learning more accessible and engaging for students.

Q15 What changes are needed to grow a culture of lifelong learning in Australia?

As educational and scholarly publishers, we understand the importance of lifelong learning for personal and professional growth. However, many Australians face limitations to accessing opportunities for lifelong learning, whether it be due to cost or location.

To address this issue, educational publishers can play a critical role in promoting lifelong learning in Australia. This can be done through the creation and distribution of high-quality educational materials, providing access to learning resources, and supporting the development of skills and knowledge across a wide range of subjects. By creating materials to support students from school onwards, publishers can address the growing need for information and data literacy, which helps combat current issues around misinformation and disinformation.

Moreover, educational publishers can support the development of micro-credentials and other alternative credentials that recognize the skills and knowledge gained through lifelong learning. By offering credentialing services, learners can validate their skills and knowledge and demonstrate their readiness for the workforce.

To further promote lifelong learning, educational publishers can develop and distribute digital tools and platforms that support self-directed and personalised learning. These tools can include adaptive learning platforms, personalised learning pathways, and other digital resources that empower learners to take ownership of their learning and promote a culture of lifelong learning.

Beyond structured lifelong learning programs, reading for pleasure and reflection is vital to the functionality of the citizenry and the public sphere. University presses have a crucial role to play in this area, and we recommend supporting their work. Encouraging and promoting reading for pleasure can be an effective way to reinforce and support formal learning.

Q25 How should Australia leverage its research capacity overall and use it more effectively to develop new capabilities and solve wicked problems?

We encourage the government to view publishers as part of the solution to developing new capabilities, and addressing wicked problems. The government has several workable options for maximising the contribution of scholarly publishers to research communication and impact:

- Government can support publishers in the current transition to open access — which publishers are already backing, despite the challenges.
- Increased funding for long-form scholarly content, particularly in the humanities and social sciences, is important to ensure that local publishing in Australia can continue to thrive. This is especially important given that major publishers like OUP and CUP have stopped publishing scholarly books by local authors in areas of strong regional importance because it is no longer viable to do so. By providing increased funding for long-form scholarly content, local authors in Australia will be able to produce high-quality research works on topics of global interest. This will help to ensure that the research produced by Australian scholars is given the attention it deserves and can contribute to global knowledge. Furthermore, by increasing funding for long-form scholarly content, it will also be possible to support small scholarly publishers in Australia who may not have the resources to ensure that their works are accessible to global research libraries. This will help to ensure that regionally focused research works produced in Australia are accessible to both local and global audiences. In summary, increased funding for long-form scholarly content is essential to ensure that local publishers and Australian scholars are able to produce high-quality research works on topics of global interest.
- Encourage collaboration between researchers, academics, and publishers. By bringing together experts from different fields, scholarly publishers can facilitate interdisciplinary research, which is essential for solving complex problems.
- Provide training and support to researchers and smaller publishers (including learned societies) to ensure that they have the necessary skills and knowledge to develop and publish high-quality research in appropriate formats. This may include training on contemporary digital technologies and communication skills.

Q26 How can Australia stimulate greater industry investment in research and more effective collaboration

High-quality research communication plays a crucial role in stimulating greater industry investment in research and more effective collaboration by:

- A. Showcasing the impact of research
- B. Providing a platform for knowledge exchange
- C. Encouraging cross-disciplinary collaboration
- D. Supporting the commercialization of research through its application

To leverage the scholarly publishing sector more effectively, Australia can invest in initiatives that support high-quality research communication, such as:

1. **Supporting the development of communication skills for researchers:** Researchers may require support to effectively communicate their research outcomes to industry partners. Initiatives that help researchers to develop communication skills, such as training programs or mentorship schemes, can be valuable.
2. **Facilitating collaboration between researchers and industry partners:** Initiatives that bring together researchers and industry partners, such as conferences, workshops or networking events, can facilitate knowledge exchange and build relationships that support effective collaboration.
3. **Encouraging industry engagement with research institutions:** Governments can support greater industry engagement with research institutions by providing incentives, such as tax breaks or grants, for industry partners that collaborate with researchers.
4. **Funding 'Gold' Open Access arrangements:** Gold Open Access – which pursues greater access with appropriate remuneration for publishers – ensures the sustainability of research publications – and facilitates the possibility of research impact through application of research. More than any other way, the impact from research arises when the new knowledge (discovered by the research process) is *applied* either through informing policy or by bringing economic benefit. The application cannot occur unless the research is first communicated. The current shift to gold open access is a fundamental enabler of research impact and the creation of a virtuous circle within the research culture.

Q31 How can the costs of participation, including living expenses, be most effectively alleviated?

There are several ways that the government can subsidise the cost of learning materials in higher education while maintaining the capacity of educational publishers to produce new Australian content:

1. **Reform of Higher Education Support Act (HESA):** Publishers recommend reforming the Higher Education Support Act to ensure all students have access to the best third-party learning materials and scholarly resources. Publishers recommend that universities should allocate a minimum proportion of student fee income towards purchasing or licensing appropriate materials. Publishers also welcome incentives for universities to work with them to develop and implement learning materials and opportunities to share research and expertise with universities to inform their teaching practices.
2. **Direct grants:** The government can provide direct grants to publishers to support the development and distribution of high-quality learning materials. This would help to offset the costs of producing these materials and make them more affordable for students
3. **Collaborative partnerships:** The government can work with publishers to develop collaborative partnerships that support the development of high-quality learning materials. For example, the government could provide funding for research projects that involve collaboration between publishers and educators. An emphasis on the importance of the development of new Australian learning materials can also be supported through university workload models that encourage teaching-focussed staff and scholarship of teaching.
4. **Negotiating bulk purchases:** The government can negotiate bulk purchases of learning materials from publishers, which would help to reduce the cost per unit and make them more affordable for students.

Q33 What changes to funding and regulatory settings would enable providers to better support students from under-represented groups in higher education?

See answer to question 31 in relation to HESA and other matters

Q36 What regulatory and governance reforms would enable the higher education sector to better meet contemporary demands?

The APA recommends several regulatory changes to help publishers respond better to sector needs:

1. Firstly, we suggest that a central agency should gather and release ongoing information about **current program and course enrolment numbers**, to provide publishers with up-to-date annual information about enrolment levels in Australian universities. This would enable publishers to make appropriate investments in new content based on likely demand.
2. Secondly, publishers propose a **national licence scheme for scholarly journals**, which would involve negotiating agreements between the government and publishers to provide access to a range of journals to all universities and research institutions across the country. This would involve a

centralised approach to purchasing licences, which would allow all institutions to access the same content at a lower cost than if they negotiated individual licences themselves.

3. To incentivize publishers to create new Australian learning content for higher education, the APA recommends several reforms to the **educational statutory licence**. These include increasing the remuneration rate for the use of copyrighted materials under the licence, expanding the scope of the licence to cover additional educational uses, and adopting a ground rules-based approach to the ongoing management of the licence.

Q41 How should research quality be prioritised and supported most effectively over the next decade?

The APA encourages the Chief Scientist's current scoping of a paid national licence to facilitate access to current research. The benefits of this licence to industry would include increased access to cutting-edge research and the latest developments in various fields, which could drive innovation and progress. It could also facilitate collaboration and partnerships between researchers and industry, leading to more effective and practical applications of research findings. A national licence would also lead to a more informed and educated population, as well as greater opportunities for interdisciplinary research and exploration. It could streamline the process of accessing and disseminating research, reducing administrative burdens and potentially saving time and resources for researchers, institutions, and industry partners. Overall, a paid national licence for accessing current research could bring significant benefits to both society and industry.

Q42 What settings are needed to ensure academic integrity, and how can new technologies and innovative assessment practices be leveraged to improve academic integrity?

Support for peer review: Ensuring academic and scholarly integrity is of utmost importance for both the Government and universities. Scholarly publishers play a crucial role in maintaining this integrity by upholding strict standards for peer review and research publication. Peer review guarantees that research is conducted ethically and that its findings are accurate and dependable. It is essential to recognize that any actions that hinder publishers' ability to uphold integrity standards, such as a shift to unsustainable open access models, could potentially compromise the accuracy and reliability of the body of human knowledge. This underscores the importance of providing funding to support rigorous, independent, publisher-managed peer review processes. Such funding will help guarantee the accuracy and reliability of research findings and safeguard the veracity of the human knowledge record.

Plagiarism, Misinformation and Disinformation: Scholarly publishers play a crucial role in preventing academic misconduct such as plagiarism by requiring strict adherence to citation and attribution guidelines. Publishers also offer resources and support to researchers to help them enhance the quality and impact of their work. These efforts by publishers help maintain the credibility and reliability of academic research. Publishers are also committed to combating misinformation and disinformation and invest heavily in supporting research integrity, such as taking action against paper mills and other forms of research misconduct. The support of the government is crucial in accelerating these efforts by publishers, leading to greater transparency and robustness of research. By working together, publishers and the government can help maintain and enhance the trustworthiness of the academic research enterprise.

Q47 What structure of Commonwealth funding is needed for the higher education sector for the system to be sustainable over the next two decades?

There is no one-size-fits-all answer to this question, as the needs of the higher education sector and the publishing industry may vary over time. However, some potential funding structures that could support the needs of higher education publishers over the next two decades include:

1. **Grants:** Government funding could be provided through grants that support the development and distribution of high-quality educational materials. These grants could be distributed through a competitive process that prioritises publishers who demonstrate a commitment to producing materials that are accessible, culturally sensitive, and meet the needs of underrepresented groups in higher education. At particular risk is the viability of long format books (or content) in the humanities and social sciences – which offer substantive treatment of policy and social issues
2. **Subsidies:** Government subsidies could be provided to offset the costs of producing educational materials, which would allow publishers to sell their products at a lower cost to universities and students. This could increase access to educational materials for students from disadvantaged backgrounds.
3. **Collaborative partnerships:** Government funding could support collaborative partnerships between higher education publishers and universities, which could involve jointly developing and distributing educational materials. This could ensure that materials meet the specific needs of individual universities, while also benefiting from the expertise of publishers.
4. **Tax incentives:** Government could provide tax incentives to higher education publishers who invest in research and development to improve the quality and effectiveness of their educational materials.

Ultimately, the most effective funding structure will depend on a range of factors, including the priorities of the government, the needs of the higher education sector, and the goals of higher education publishers. The way towards a good outcome is an open ongoing conversation between universities, government and the higher education publishing sector.

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This is a public submission.