Turning the Page: An Analysis of Accessible Publishing in Canada

by

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# Abstract

Unfortunately, not every Canadian book is accessible to every Canadian reader. Print disabilities (which include visual, learning, and physical disabilities) affect a significant portion of Canadian readers, and in 2018 Employment and Social Development Canada (ESDC) arranged a Working Group on Alternate Format Materials for Canadians with Print Disabilities to come up with a strategy for producing more print materials in Canada in accessible formats. The Canada Book Fund in the Department of Canadian Heritage conducted research on the topic to provide ESDC with accurate data as well as to further the Department's knowledge of a very niche market that may be underserved. This report examines the landscape of accessible publishing in Canada: who it is for, how it is done, and how it could be done better. Following an analysis of the industry, this report provides suggestions as to how accessible publishing might be supported through the Government of Canada.

**Keywords**:   Government of Canada, Department of Canadian Heritage, Book Publishing Policy and Programs, Canada Book Fund, government policy, accessibility, print disabilities, government funding

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**Note:** The views or opinions expressed in this report do not represent the views or opinions of the Government of Canada, the Department of Canadian Heritage, anyone employed in the public service, or anyone affiliated with the Government of Canada or the Department of Canadian Heritage. All information documented in this report is available to the Canadian public and may be accessed by any Canadian citizen or permanent resident of Canada, and complies with the Government of Canada's Policy on Access to Information.

# Abbreviations

**CBF**               the Canada Book Fund

**CELA**            the Centre for Equitable Library Access

**CNIB**            the CNIB Foundation, or the Canadian National Institute for the Blind

**CSD**              Canadian Survey on Disability

**DAISY**          Digital Accessible Information System

**ESDC**            Employment and Social Development Canada

**IELA**            the Initiative for Equitable Library Access

**IFLA**            the International Federation of Library Associations and Institutions

**LAC**              Library and Archives Canada

**NNELS**          the National Network for Equitable Library Service

**UEB**             Unified English Braille

# 1: Introduction

With over $35 million in funds allocated each year, the Canada Book Fund (CBF), administered by the Government of Canada, is the largest funding body for book publishers in the country. Every year over 300 publishers and organizations apply for the Support for Publishers and Support for Organizations programs, of which almost all are granted funding in order to further the book trade in Canada.[1] I was lucky enough to complete my Master of Publishing professional placement with the Canada Book Fund as a Junior Program Officer and Policy Analyst, where I got to learn the intricacies of the program and how exactly funding is allocated by the Government of Canada. My duties mostly included application assessment and policy analysis, but when the opportunity came up to help Dr. Julie Fairweather, Director of the CBF, with a specific project related to accessibility in the Canadian book publishing industry, I jumped at the chance. Accessible publishing is not currently measured by the CBF, and when an outside department requested more information on the topic, we had industry expertise to offer but unfortunately no exact statistics. The Government of Canada has a commitment to improving accessibility for Canadians with disabilities so that they may fully participate in society, and this request came at the perfect time for me to dive right in to the world of accessible publishing. I have learned so much about a subject that is vaster than I ever imagined, and this report will detail the endeavour towards informing the Government of Canada with statistics for accessibility in the Canadian, English-language trade book publishing industry.

Earlier this year a Working Group on Alternate Format Materials for Canadians with Print Disabilities was arranged by Employment and Social Development Canada (ESDC) with its secretariat in the Office for Disability Issues. The objective of this Working Group was to develop a strategy to address the needs of people with print disabilities. Various sectors (mostly not-for-profit and public) were included, such as the publishing industry, disability services, library associations, alternate format organizations, and Indigenous organizations, as well as representatives from government departments such as those dealing with print publications (for example, the Canada Periodical Fund, the Canada Book Fund, and Library and Archives Canada); Disability Issues; and Innovation, Science and Economic Development. It is important to note that the Working Group only had one representative from the book publishing sector,

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[1] Department of Canadian Heritage, Government of Canada "Canada Book Fund – Program Update," internal document, June 3, 2018.

representing the Association for Canadian Publishers (for a complete list of Working Group members, see Appendix A). The desired outcome identified by this Working Group is having print publications "born" accessible (that is to say, not converted into an accessible format only after publication, rather alongside the common codex). The dynamics of a wide range of industries must be considered, and Dr. Julie Fairweather and I, along with other members of the Book Publishing Policy and Programs team were responsible for providing ESDC with our industry knowledge on the topic of accessibility.

The next section of this paper will explore the research that has already been done in the area of print disabilities in Canada in order to give an understanding of the environment surrounding the topic of accessibility in book publishing. It will identify and define the problems facing print-disabled persons (who comprise those who are visually impaired or blind, those physically unable to hold or manipulate print material, and/or those with learning disabilities that interfere with their ability to comprehend or interpret text or visual information) in accessing print media, specifically focusing on books. It will also give an introduction to alternate formats and the technologies used to produce and access them.

Part 3 will explain the current setting for how accessibility is addressed in the Canadian print market, including new research undertaken by the author in order to analyse the current state of accessibility in the Canadian print industry and explore how the needs and barriers of Canadian English-language publishers are currently being addressed. 3.a details a survey of Canadian-owned, English-language, trade book publishers that are recipients of funding from the CBF in the fiscal year 2017/18. These parameters are determined by access and reasonable expectations of a timeline. This survey will help to establish a "baseline" for accessibility in Canadian print publications upon which we can begin to formulate a solution.

In Part 4 we will look further into the role the Government of Canada and the CBF play or can play in furthering the accessibility of the Canadian print industry. Assessing the difficulties faced by Canadian publishers (discussed in part 3) will allow us to make an educated recommendation or set of recommendations on potential avenues for the government to consider in order to address and bridge the gap between publishers' current practices and a measurable accessibility goal.

This report focuses on a large-scale analysis of accessibility in the Canadian publishing industry and is largely based on research. The nucleus of my Master of Publishing professional placement project is the accessibility survey (outlined in 3.a) but there is much more to this topic to explore. This research and subsequent report will help fill gaps in the Department of Canadian Heritage's knowledge of the specific

industry, especially regarding the current landscape of accessible versions of print publications available to individuals with print disabilities. Furthermore, this research will help inform the department's ongoing policy analysis and program development activities with respect to Book Publishing Policy and Programs. In a broader sense, this report will open the door to further research into what needs to be done to help publishers address the needs of readers with print disabilities.

# 2: Identifying the problems faced by people with print disabilities

## 2.a: The people

### 2.a.i: Definition of print disabilities

The definition of "print disability" is not a simple one. Of course, print disabilities include blindness, but may include any disability that interferes with the ability to interpret written text and/or interact with physical printed material. Print disabilities can be visual, physical, or learning disabilities and may include things like blindness, low vision, dyslexia, and any physical disabilities that hinder one's ability to hold or manipulate a physical book or other printed object (such as turning pages, for example).[2]

Two legal documents that apply to Canadians with print disabilities each have their own similar yet specific definitions on what constitutes print disability. The first legal document is the Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired or Otherwise Print Disabled, which defines its beneficiary as a person who

> (a) is blind;

> (b) has a visual impairment or a perceptual or reading disability which cannot be improved to give visual function substantially equivalent to that of a person who has no such impairment or disability and so is unable to read printed works to substantially the same degree as a person without an impairment or disability; or

> (c) is otherwise unable, through physical disability, to hold or manipulate a book or to focus or move the eyes to the extent that would be normally acceptable for reading;

> regardless of any other disabilities.[3]

The second document is Canada's Copyright Act, which defines a print disability as

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[2] "Making Reading Accessible," Centre for Equitable Library Access, accessed September 22, 2018, http://iguana.celalibrary.ca/iguana/www.main.cls?surl=CELA-MakingReadingAccessible&theme=celadefault&lang=eng.

[3] "WIPO-Administered Treaties: Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired or Otherwise Print Disabled," World Intellectual Property Organization, June 27, 2013, http://www.wipo.int/wipolex/en/treaties/text.jsp?file_id=301016.

a disability that prevents or inhibits a person from reading a literary, musical, artistic or dramatic work in its original format and includes such a disability resulting from

(a) severe or total impairment of sight or the inability to focus or move one's eyes;

(b) the inability to hold or manipulate a book; or

(c) an impairment relating to comprehension.[4]

Due to these broad definitions, it becomes clear that we cannot combine every person with a print disability into one neat category, and one all-encompassing solution to the lack of accessible print materials in Canada will not be simple.

## 2.a.ii: Identifying the population of Canadians with print disabilities

According to a 2015 information request completed for Industry Canada (now Innovation, Science and Economic Development Canada) by the 2012 Canadian Survey on Disability (CSD), the number of people with print disabilities whose needs comply with the Marrakesh Treaty definition can be estimated as between a range of 760,400 and 1,503,300 adult Canadians (aged fifteen and older), depending on the type and severity of the disability.[5] These numbers do not include those whose vision could be improved with the aid of corrective lenses. The more conservative estimate of 760,400 strictly adheres to the definitions of the Marrakesh Treaty and the Copyright Act (mentioned above) and includes those with significant visual, physical, and learning or developmental disabilities. The upper estimate of 1,503,300 refers to all Canadians with these disabilities, including those with milder forms that may or may not require access to print materials in an accessible format. Something to keep in mind is that "the population covered by the CSD consists of all persons aged 15 and over . . . [and] persons living in private dwellings [but] the population of Indian reserves [is] excluded."[6] This means that children under the age of fifteen, people not living in private dwellings (including homeless and those living in institutions such as hospitals, retirement homes, etc.), and those living on Indian reserves are not

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[4] Legislative Services of Canada, "Consolidated Federal Laws of Canada, Copyright Act," Justice Laws Website, June 19, 2017, http://laws-lois.justice.gc.ca/eng/acts/c-42/FullText.html.
[5] Statistics Canada Government of Canada, "Canadian Survey on Disability 2012," Statistics Canada, February 29, 2016, https://www150.statcan.gc.ca/n1/pub/89-654-x/89-654-x2013001-eng.htm.
[6] Government of Canada, "Canadian Survey on Disability 2012."

counted in the estimates and may have a significant effect on the data should they be included. A person can be affected by a print disability regardless of age, financial status, ethnicity, location, gender, profession, number and severity of disabilities, and/or any number of other potential factors. It is important to remember that people with print disabilities interact with print materials in many different ways, and one must attempt to consider all these variables in identifying a population of people with print disabilities and their needs.

## 2.a.iii: Identifying the needs of Canadians with print disabilities

According to Bill C-81 (the Accessible Canada Act), access to print material can be viewed as a right of all Canadians, regardless of ability. Among other principles, the Accessible Canada Act outlines that "all persons must have barrier-free access to full and equal participation in society, regardless of their abilities or disabilities."[7] The purpose of the bill "is to benefit all persons, especially persons with disabilities . . . particularly by the identification and removal of barriers, and the prevention of new barriers."[8] Although Bill C-81 does not yet have a date for entry into force,[9] once passed, it would allow the Canadian government to take steps towards a completely accessible Canada, including for those affected by print disabilities. As noted above, however, "Canadians with print disabilities" is not simply defined, and therefore their needs cannot all be met with one uniform solution.

In their "Libraries for the Blind in the Information Age: Guidelines for Development" report,[10] the International Federation of Library Associations and Institutions (IFLA) identifies five groups with distinct print needs: Children, Students, Working Adults, Multicultural Groups, and Seniors. Each of these groups requires individual attention in their diverse needs when it comes to their print disabilities. The particular disadvantage faced by children with print disabilities is that they are unable to browse books for themselves and are reliant upon teachers, parents, and librarians to help them choose books to

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[7] Parliament of Canada, Government of Canada, "Government Bill (House of Commons) C-81 (42-1) - First Reading - Accessible Canada Act," Parliament of Canada, June 20, 2018, http://www.parl.ca/DocumentViewer/en/42-1/bill/C-81/first-reading.

[8] Parliament of Canada, Government of Canada, "Government Bill (House of Commons) C-81 (42-1) - First Reading - Accessible Canada Act."

[9] Parliament of Canada, Government of Canada, "Government Bill (House of Commons) C-81 (42-1) - First Reading - Accessible Canada Act."

[10] Rosemary Kavanagh and Beatrice Christensen Sköld, eds., "Libraries for the Blind in the Information Age: Guidelines for Development," IFLA Professional Reports 86 (The Hague: IFLA Headquarters, 2005), http://archive.ifla.org/VII/s31/pub/Profrep86.pdf.

support literacy and a passion for reading. Studies such as those done by Kerstin Fellenius have shown that children with print disabilities, if exposed to braille at an early age, have the same reading skills as sighted children of the same age.[11] The IFLA cites the main disadvantage faced by students of school, college, or university as "the continuous problem of not receiving material in time for course work and exams,"[12] as well as the availability of comprehensive adaptive technologies in their libraries. Working adults with print disabilities require accessible print materials in order to carry out the day-to-day duties of their jobs as well as to advance their careers. Multicultural groups may be able to access literature in other languages via interlibrary loan if these materials are not readily available at their own library, but this becomes more difficult when searching for the same materials in accessible formats. Searches on the Centre for Equitable Library Access's (CELA) website[13] yield some results in other languages such as German, Latin, Hindi, and Italian, but the vast majority of results (sometimes tens of thousands more) are for English and French publications. People with print disabilities living in Indigenous communities are doubly underprivileged due to the low literacy rates and lack of access to libraries for those living on Indian reserves.[14] Seniors are "the fastest growing population of users of libraries for the blind"[15] and have just as much need for accessible print materials as the other groups on this list. Seniors may have the added disadvantage of mobility difficulties, and they may live in a seniors' residence, both of which factor in to their access to libraries, adding another hurdle to their access of print materials.

In 2017, the Canadian National Institute for the Blind (CNIB) canvassed over four thousand Canadians impacted by blindness and recorded the following priorities in their 2018-22 strategic plan: the ability to work, access to appropriate technology, and the need for equality and respect. The plan reports that "91% of respondents agreed employment levels are a serious problem facing people with sight loss in Canada," "97% of respondents with sight loss said accessible technology is important in leading an

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[11] Kerstin Fellenius, *Reading Skills of the Visually Impaired, Experiences from Reading Training of Eight Pupils* (Stockholm: Stockholm Institute for Education Press, 1996) 89.

[12] Rosemary Kavanagh and Beatrice Christensen Sköld, eds., "Libraries for the Blind in the Information Age: Guidelines for Development," IFLA Professional Reports 86 (The Hague: IFLA Headquarters, 2005), http://archive.ifla.org/VII/s31/pub/Profrep86.pdf.

[13] "CELA - Home," Centre for Equitable Library Access, accessed September 22, 2018, http://iguana.celalibrary.ca/iguana/www.main.cls?surl=CELA-home&lang=eng&theme=reset.

[14] Beverley O'Neil, *Three Year Business Plan: Improving Reading of Aboriginal People.* (National Aboriginal Library Association, 2016), http://campagnepourlalecture.ca/wp-content/uploads/2013/08/NALA-Final-Report.pdf.

[15] Rosemary Kavanagh and Beatrice Christensen Sköld, eds., "Libraries for the Blind in the Information Age: Guidelines for Development," IFLA Professional Reports 86 (The Hague: IFLA Headquarters, 2005), http://archive.ifla.org/VII/s31/pub/Profrep86.pdf.

independent life," and "69% of respondents with sight loss reported experiencing social stigma related to blindness."[16]

It is important to keep in mind that not all print disabilities are the same and therefore the term "accessible" is not an end in itself. People with print disabilities may not only have different disabilities from one another, but may also have different ages, education levels, and access to resources (technologies, libraries, etc.). What serves as a solution for one group may not necessarily apply to another and there are many moving parts to the system as a whole.

## 2.b: Alternate formats

According to the 2012 Canadian Survey on Disability, over 80 percent of adults aged fifteen or older who reported a seeing disability that limited their daily activity wore glasses or contact lenses, and almost 70 percent of adults fifteen or older reported using at least one type of aid or assistive device specific to vision disabilities. The types of aids listed that are relevant to the book industry were magnifiers (51.1%), large print reading materials (34.3%), dark lined paper/dark ink pens (28.1%), audio/ebook devices (9.3%), computers with specialized features (5.4%), and braille reading materials/manual braillers (0.8%). It is worth mentioning that Statistics Canada notes the statistic for braille reading materials/a manual brailler should be used with caution.[17]

Canadians with print disabilities have a variety of options available to them in order to aid the reading process. To expand upon the list of visual aids by Statistics Canada (above), people with visual impairments may use dedicated devices or software such as screen readers, wearable devices (usually a pair of smart glasses connected to a device such as a smartphone), magnifiers, and refreshable braillers, among others. There are also many options for physical, printed books that may use large print, tactile images, braille, printbraille, and/or dyslexic fonts, and still other options for electronic books that may be designed in such a way as to offer many accessibility features.

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[16] CNIB Group, *Bold Dreams, Bright Futures: CNIB Strategic Plan 2018-22* (Canadian National Institute for the Blind Foundation, n.d.), https://cnib.ca/sites/default/files/2018-09/FOUNDATION-STRAT_PLAN_2018_ENG_v4_ACCESS_FINAL-s_790631.pdf.

[17] Statistics Canada, Government of Canada, "Seeing Disabilities among Canadians Aged 15 Years and Older, 2012," Statistics Canada, February 29, 2016, https://www150.statcan.gc.ca/n1/pub/89-654-x/89-654-x2016001-eng.htm.

## 2.b.i: Braille

The first thing one may think of as a response to the needs of people with print disabilities is probably braille. Braille was created by Louis Braille in the nineteenth century after a childhood accident left him blind in both eyes.[18] The tactile writing system uses one "braille cell," which each consist of two columns of three dots per character (including letters, numbers, and punctuation), and can be applied to any system of writing that uses the Roman alphabet. Braille has been refined over the years and in 1991 the Braille Authority of North America "initiated the development of what has become Unified English Braille (UEB)."[19] In 2004 the International Council on English Braille presented UEB to its members to be used as their national standard for braille; Canada adopted UEB in 2010.[20] To write braille, a person may use the "slate and stylus method," which includes punching holes in thick paper held by a metal frame, or they may use a brailler (also known as a "braille typewriter") which embosses paper as a user types on keys specifically designed to represent braille characters. A more modern way of reading and typing braille is by using a "refreshable braille display." These machines use braille keyboards like braille typewriters, but rather than typing onto paper, the user types digitally. To read with a refreshable braille display, a reader runs their fingers over a line of braille cells that are electronically "refreshed" with rounded pins raising and lowering inside each cell as the cursor moves along the screen.

"Printbraille" is the term for books that have either been produced with both printed words and embossed braille, or printed books that have had braille added to their pages. These books allow for readers with different needs to enjoy the same stories. Reading with printbraille is a very useful activity for children learning to read braille because a sighted parent or other adult or friend can read along with a child who has little or no vision.[21]

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[18] Royal Blind Asylum and School, "Who Was Louis Braille?," National Braille Week, accessed September 22, 2018, https://www.royalblind.org/national-braille-week/about-braille/who-was-louis-braille.

[19] "History of Braille," Braille Literacy Canada, accessed September 22, 2018, http://www.brailleliteracycanada.ca/en/what-is-braille/history-of-braille.

[20] "History of Braille."

[21] Centre for Equitable Library Access and Canadian National Institute for the Blind Foundation, *Smashing Braille Myths: Hands-on Literacy!*, 2016, http://accessola2.com/superconference2016/Posters/Smashing-Braille-Myths.pdf.

## 2.b.ii: Other print features

Not all people with visual disabilities are completely blind, and therefore they may not have a need for braille or completely reformatted materials. In addition to braille, printed books may be published or have added such features as large print, tactile images, and/or dyslexic fonts. The American Foundation for the Blind states that the standard font size for large print is 18 point, and plain, sans serif fonts and strong contrast can improve the readability of a print publication.[22]

Tactile images are raised images on a page that allow a person with a visual disability to read using their fingers; they are a means of conveying non-textual information to those who cannot rely on sight to read. Many children's books have tactile images made from various plastics, fabrics, and other materials, but these are not the only types of tactile images. The technique most frequently used to create tactile images is thermoforming, where a plastic sheet is heated and formed around a model, and some braille embossers are able to create tactile images using embossing. These methods leave a raised or lowered representation of the image on the page. According to TactileGraphics.org, "A tactile graphic is not a straight reproduction of the print graphic, or a tactile 'photocopy' of the original. A tactile graphic does not include the symbols expected by visual readers, such as color, embellishment, and artistic additions."[23] There are many considerations to make before adding tactile images to a book including audience, intent, how the information will be portrayed, etc. and this process must be thought of in a different way than adding print images to books.

Dyslexia, a neurological disability that affects a person's ability to read and write, is the most common learning disability.[24] According to a 2013 study conducted by Luz Rello and Ricardo Baeza-Yates, around 15–20 percent of the world's population have a language-based learning disability, of which likely 70–80 percent have dyslexia. The Rello and Baeza-Yates study concluded that "font types have an impact on readability of people with dyslexia," and that "sans serif, monospaced, and roman font types increased significantly the reading performance, while italic fonts decreased reading performance." The study

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[22] Maureen A. Duffy, "Using Large Print," VisionAware, 2016, http://www.visionaware.org/info/everyday-living/essential-skills/reading-writing-and-vision-loss/large-print/1234.

[23] Lucia Hasty, "Introduction to Tactile Graphics: A Basic Overview," TactileGraphics.org, accessed September 22, 2018, http://www.tactilegraphics.org/whataretgs.html.

[24] "About Dyslexia," The International Dyslexia Association Ontario Branch, accessed September 22, 2018, https://www.idaontario.com/about-dyslexia/.

suggests Helvetica, Courier, Arial, Verdana, and CMU as helpful fonts for people with dyslexia.[25] Other fonts such as Dyslexie and Open Dyslexic have been created specifically for aiding the reading process for readers with dyslexia and are strong contenders for the most accessible fonts to use.[26] Simply using a more accessible font in a book can help a publisher reach a wider audience.

## 2.b.iii: Audio and ebooks

The above physical print solutions are not the only formats available to readers with reading disabilities. Those with these print disabilities may benefit from the help of audiobooks and ebooks with specialized features. It is not necessarily sufficient simply to publish a book in a digital format; audiobooks and ebooks require certain standards to be considered accessible. For example, a PDF or MP3 version of a book, while more accessible than print, does not provide all the necessary functionalities of comfortable, efficient reading.

Not everyone reads a book starting with the first word and ending with the last, which is all an audiobook created in MP3 format can offer. Even though MP3 audiobooks are the most widely available, they are very rigid in what they can provide to an individual with a print disability. For example, MP3s do not inherently allow a reader to vary the speed of the lecture or navigate throughout the book. Furthermore, traditional MP3 audiobooks require the creator to hire a narrator: an expensive and potentially superfluous task for the publisher. This step could be eliminated in some cases by producing audiobook files that are compatible with text-to-speech software.

The most accessible versions of audiobooks are created using the Digital Accessible Information System (DAISY) standard. A DAISY digital talking book allows users access to text-to-speech, refreshable braille, and alternative visual displays, depending on the device they are using to access the book. When files are created in accordance with the DAISY standard, "they make possible a wide range of features such as rapid, flexible navigation; bookmarking and highlighting; keyword searching; spelling of words on demand; and user control over the presentation of selected items (e.g., footnotes, page numbers,

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[25] Luz Rello and Ricardo Baeza-Yates, "Good Fonts for Dyslexia," in *Proceedings of the 15th International ACM SIGACCESS Conference on Computers and Accessibility - ASSETS '13* (the 15th International ACM SIGACCESS Conference, Bellevue, Washington: ACM Press, 2013), 1–8, https://doi.org/10.1145/2513383.2513447.

[26] Fernette Eide, "The Best Fonts for Dyslexia," Dyslexic Advantage, accessed September 22, 2018, https://www.dyslexicadvantage.org/the-best-fonts-for-dyslexia/.

etc.)."[27] A user can access a DAISY digital talking book by using a dedicated DAISY digital talking book reader, but these file formats are also accessible by other devices running DAISY playback software or other screen-reading software, or they can be printed on paper in large print or braille. DAISY features "enable readers with visual and physical disabilities to access the information . . . flexibly and efficiently, and allow sighted users with learning or reading disabilities to receive the information through multiple senses."[28] In other words, DAISY provides accessibility to readers facing a wide range of print disabilities.

For ebooks, the highest level of accessibility can be achieved by publishing in the EPUB file format. The most current and accessible version of EPUB is EPUB3, which "has embraced all accessibility features present in the DAISY standard."[29] Unlike PDFs, EPUB files are automatically reflowable (as opposed to having a fixed layout) and offer a wide range of accessibility features such as text-to-speech, language support, enhanced metadata, nested tables of contents, dynamic page numbers, HTML5 tags, described video, and other interactivity features.[30] The EPUB file format is not accessible in itself per se; rather, it allows for these accessibility features to be accessed and used depending on the device on which the file is accessed. To ensure accessibility for their books and to reduce costs, it is in the publisher's best interest to publish books in EPUB when the file is initially created.

## 2.b.iv: Other technologies

Stressing once more the inutility of lumping all people with print disabilities into the same category, there are numerous other technologies in addition to those mentioned above that have been produced in order to aid the reading process for people with a range of print disabilities. Someone with a vision disability has the options of audiobooks and ebooks but may also use the assistance of a screen reader or magnifier to help them read any written words on a screen. Screen readers also play a large role in the lives of those with physical disabilities who may be unable to hold a book or turn its pages.

[27] NISO Committee AQ on Digital Talking Books, "Specifications for the Digital Talking Book," interactive, DAISY Consortium, April 21, 2005, http://www.daisy.org/z3986/2005/Z3986-2005.html?q=z3986/2005/z3986-2005.html.
[28] NISO Committee AQ on Digital Talking Books, "Specifications for the Digital Talking Book."
[29] Prashant Ranjan Verma, "Making Publications Accessible for All," DAISYpedia, 2016, http://www.daisy.org/daisypedia/making-publications-accessible-all.
[30] "EPUB 3.0," International Digital Publishing Forum, 2017, http://idpf.org/epub/30.

Screen readers (such as JAWS,[31] Non-Visual Desktop Access [NVDA],[32] Microsoft Narrator,[33] and/or Apple VoiceOver[34]) help the user by reading aloud what is on the screen.[35] They are maneuvered by using a keyboard, a refreshable brailler, or by tapping or pressing buttons on the device. There are screen readers to support a variety of devices and systems, and most are available in multiple languages, may be combined with manual brailler technologies, and are available for free download online.

Magnifiers do just what their name implies: they magnify text on the screen and make it easier for someone with low vision to see what they are reading by enlarging and enhancing the text.[36] There are several magnifiers specifically designed for those with vision loss, such as ZoomText,[37] Supernova,[38] and MAGic.[39] Most magnifiers either have an incorporated screen reader option, or they themselves are incorporated into screen reader devices or software. Most operating systems come with native magnifiers as accessibility features for their respective devices.

## 2.c: Section summary

This section explores research that has already been done regarding accessibility in the book publishing landscape including problems faced by people with print disabilities. It becomes apparent that the term "print disability" is complex, and so too are the people who live with these disabilities on a regular basis. Print disabilities affect roughly one million Canadians but it is impossible to lump all of these people into one neat category. People with print disabilities are diverse not only in their disabilities, but also in their

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[31] "JAWS Downloads," Freedom Scientific, 2018, https://www.freedomscientific.com/Downloads/JAWS.

[32] "About NVDA," NV Access, July 5, 2017, https://www.nvaccess.org/about-nvda/.

[33] "Hear Text Read Aloud with Narrator," Microsoft, November 30, 2017, https://support.microsoft.com/en-ca/help/17173/windows-10-hear-text-read-aloud.

[34] "Vision Accessibility," Apple (CA), accessed September 22, 2018, https://www.apple.com/ca/accessibility/mac/vision/.

[35] "Screen Readers," CNIB Foundation, accessed September 22, 2018, https://cnib.ca/en/sight-loss-info/living-with-blindness/technology/screen-readers.

[36] "Magnification," CNIB Foundation, accessed September 22, 2018, https://cnib.ca/en/sight-loss-info/living-with-blindness/technology/magnification.

[37] "ZoomText," ZoomText, accessed September 22, 2018, https://www.zoomtext.com/.

[38] "Dolphin SuperNova Enterprise," Dolphin Computer Access, accessed September 22, 2018, https://yourdolphin.com/supernova-enterprise?gclid=Cj0KCQjwof3cBRD9ARIsAP8x70O5QO_gPvhBCqS6weI5zxkaSRwugGveGqU5E1__KXch_bzKMYZqWLgaAhy4EALw_wcB.

[39] "MAGic® Screen Magnification Software," Freedom Scientific, accessed September 22, 2018, https://www.freedomscientific.com/Products/LowVision/MAGic.

ages, education, access to resources, and lifestyles. Addressing all of their needs cannot be accomplished easily or all at once. This is why education and research are necessary to efficiently tackle these problems.

Part 3 begins some of this research. The next section will dive into an exploration of the current setting of how accessibility in Canadian book publishing is addressed. It will include new research conducted by the Canada Book Fund in measuring the landscape of accessible publishing in Canadian, English-language trade book publishing.

# 3: How accessibility in the Canadian print industry is currently being addressed

As of the time of writing, there is no funding specifically designated for the creation of accessible print materials available to book, magazine, or newspaper publishers through the Canada Book Fund or Canada Periodical Fund. In order for a Canadian with a print disability to access appropriate reading materials, they must go through their public library, who in turn accesses these materials through a third-party organization such as the Centre for Equitable Library Access (CELA) or the National Network for Equitable Library Service (NNELS) (see more about these organizations in 3.b). CELA and NNELS are funded by the provincial and territorial governments of the provinces and territories whose libraries they serve. Funding is provided on an ad hoc basis; there is no overarching federal program that directly serves the needs of these organizations and their members. When a reader requests a book through their library, CELA or NNELS will then send a request to the appropriate publisher. Usually, the publisher is willing to arrange an agreement with the library service and voluntarily provides the files necessary to create an accessible version of their book. In some cases, permission is not forthcoming and a publisher either fails to reply to a request or cites concerns regarding copyright. In these cases, CELA or NNELS is still able to produce the appropriate materials by way of a copyright exemption (Section 32 in the Copyright Act) which applies to persons with perceptual disabilities (more on this exemption in 3.a.iv.(2)). Having to request permission from publishers each time a new book is requested is time-consuming. Furthermore, through this avenue, the publisher does not receive additional compensation for the reproductions of their book.

The current process for getting accessible versions of books into the hands of Canadians with print disabilities is not ideal. There have been endeavours to remedy this in the past (see Part 4 for an example) but it is time we seek out a new method. Since there is currently no federal funding available for book publishers to address accessibility, few statistics have been collected to measure exactly how the industry views and addresses accessible formats. 3.a describes an attempt to gather this information.

## 3.a: Survey sent to publishers by the Canada Book Fund Book Publishing Policy team

When Employment and Social Development Canada (ESDC) reached out to the Canada Book Fund with a request for information regarding a "baseline" of accessible publishing in Canada, there were no specifics to give them; thus, the importance of conducting a survey with which we could assess this baseline was recognized. Asking publishers a simple "how many of your books are accessible?" would not be sufficient. As explored in this report, the subject of accessibility is complex. Persons with print disabilities cannot all be placed in the same category, and therefore a book that meets the needs of one may not even come close to meeting the needs of another. Clearly, a more in-depth survey was necessary.

## 3.a.i: Outline

Because the Canada Book Fund is responsible for funding the activities of book publishers, it was the obvious choice to use the Canada Book Fund to conduct this survey of a baseline of accessible publishing in Canada. We began designing this survey in July 2018 with the input of ESDC and it was ready to be distributed in September 2018. We decided to focus the survey according to several parameters: the publishers who received the survey are Canadian-owned, publish trade books (including children's literature and picture books), and publish in English. The survey was sent by the Canada Book Fund and therefore only to CBF applicants. In order to be eligible for funding from the Canada Book Fund, a publishing firm must

·have completed at least 12 months of operation as a book publisher;
·be at least 75% Canadian-owned and controlled in fact;
·have its headquarters and at least 75% of its employees based in Canada;
·be a private-sector firm or university press;
·be financially viable, and

·have fulfilled all contractual obligations with respect to author royalty payments or other method of payment to authors, from the beginning of the reference year through to the end of any contribution agreement.[40]

The recipients of this survey were therefore limited to only those firms that have met these criteria. The survey was *not* sent to publishers that publish educational or scholarly books or books in French. We decided to narrow the scope to include only trade book publishers and not educational or scholarly publishers because the market for educational and scholarly books in accessible formats, and how they are accessed, is very different from the market for trade books, or, in other words, books intended for a general readership. These genres of books fall into a different category due to their availability in schools and inclusion in curriculums. Educational and scholarly books cannot be treated the same as trade books because they exist in a different market, which was not the focus of this study. Furthermore, people with print disabilities rarely seek out educational and scholarly books from their public libraries, and so trade books are CELA and NNELS' priority. The reasoning behind narrowing the survey recipients to only English-language publishers again comes down to market. Although Canada is a bilingual country, the English and French book markets are very different from each other. More research into the Canadian French-language and educational and scholarly book markets may be needed in order to form a complete picture of accessibility in Canadian publishing as a whole.

The survey was sent on September 25, 2018 to eighty-seven English-language, Canadian-owned trade book publishers who will be supported through the Canada Book Fund in the 2018/19 fiscal year. Fifty-seven publishers responded and results were received on October 16, 2018. Respondents were not required to answer every question. The full survey can be found in Appendix B.

### 3.a.ii: Objectives

The objective of the survey was to establish a baseline of how publishers are currently addressing accessibility in the Canadian English-language publishing industry. We also set out to identify the reasons for this baseline and to determine publishers' needs and barriers in making their books more

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[40] Department of Canadian Heritage, Government of Canada "Support for Publishers: Publishing Support," Canada Book Fund, July 25, 2017, https://www.canada.ca/en/canadian-heritage/services/funding/book-fund/publishing-support.html.

accessible. The data is intended to be used by the Canada Book Fund as a foundation for research into practices in the production and distribution of alternate format materials. It will also play a part in analysing the role current and emerging technologies may have with respect to alternate format materials in Canada. The results of this survey have already begun to fill gaps in the department's knowledge of the Canadian English-language trade book industry, especially regarding recipients' current practice of and barriers to providing accessible versions of their publications to print-disabled individuals. Furthermore, the survey will continue to help inform the department's ongoing policy analysis and program development activities with respect to books.

## 3.a.iii: Baseline of accessible publishing in Canada

Thanks to the publishers who responded to our survey, we now have an idea of the accessibility landscape in the world of Canadian, English-language trade book publishing. What we learned is that accessible publishing is happening in the industry, but it is far from established. Publishers will need more support (most specifically financial) from a variety of sources and will need to see more of a demand for these books before accessible publishing becomes more mainstream.

Nearly 30 percent of publishers surveyed said that between 1 and 10 percent of their titles (both back and frontlist) are offered in at least one accessible format. Only 5.26% of publishers said that 91–100 percent of their titles are offered in at least one accessible format. Only three publishers said that all of their books are initially published in an accessible format alongside the publication of the non-accessible format; 67.44% of publishers said that none of their titles are published this way.[41]

Very few accessibility features are currently available in publishers' print titles. Publishers were invited to estimate how many of their print titles offered braille, tactile images, dyslexia-friendly fonts, and large print, and the vast majority answered "no titles" to all of the features suggested (braille 70.27%, tactile images 88.24%, dyslexia-friendly fonts 60.00%, and large print 53.85%). Only one publisher offers "all titles" with only one of the features: dyslexia-friendly fonts. Comments suggest that publishers

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[41] Department of Canadian Heritage, "Results: Publisher Accessibility Survey," internal document, October 16, 2018.

mostly rely on third-party services to create accessible versions of their print titles at the request of readers.[42]

Thanks to the data from our survey, we know that publishers are producing more ebooks than they are audiobooks. When asked how many of their audiobooks are available in DAISY standard and other than DAISY standard, 60.00% and 43.33% of publishers answered "no titles" (respectively). 32.43% of publishers publish at least 1 percent of their ebooks in EPUB3.1 standard and 13.51% publish "all titles" in this standard.[43]

## 3.a.iv: Barriers and challenges faced by publishers in implementing accessibility options

Our survey data tells us that financial needs are the biggest barriers to accessible publishing faced by the industry,[44] and many of the other challenges could be at least partially alleviated by access to more capital. Besides monetary hurdles, publishers must deal with copyright stipulations as well as their other, higher priorities before they can address more accessible publishing.

### 3.a.iv.(1): Costs

Access to funds was the most significant barrier reported by publishers, with 67.86% of survey respondents selecting "Costs are high" as one of the answers to the question "What are the biggest barriers to your publishing business in making titles more accessible?" We asked publishers what would be the most beneficial support to them in producing more accessible titles. The two options were "Training and technological capacity to do this in-house" and "Access to a third-party service." Publishers had the choice of choosing "Other" and providing their own details. 71.42% of respondents who chose "Other" (19.21% of total respondents) wrote that the most beneficial support to them would be funding, without that having been mentioned as an option.[45]

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[42] Department of Canadian Heritage, "Results: Publisher Accessibility Survey," internal document, October 16, 2018.
[43] "Results: Publisher Accessibility Survey."
[44] "Results: Publisher Accessibility Survey."
[45] "Results: Publisher Accessibility Survey."

The second most prevalent barrier faced by publishers in accessibility publishing is staff availability. One publishing house mentioned that they have a part-time ebook production manager, but due to the company's small size, her time is divided among other tasks as well. Another publisher suggested that they will be looking into collaborating with other publishers to address this topic of accessible publishing.[46] 69.81% of respondents to our survey[47] and 66% of respondents to BookNet's survey on the state of digital publishing[48] have an annual income of less than $1 million which shows us that a significant portion of our country's publishers are small and may lack the capacity to hire and train more individuals, especially if their role is to focus on a lower priority such as accessibility.

39.29% of publishers who responded to the survey agree that access to the necessary technology is one of the biggest barriers to their producing more accessible titles, and 26.79% of publishers don't know enough about the subject or technologies involved to successfully produce more accessible books.[49] Due to the fact that the majority of English-language publishers in Canada are small, a large contributor to the root of the problem is access to capital with which a publisher could more easily hire staff, buy software and/or hardware, receive technology training, or contract other organizations to help them publish more accessible books.

In some instances, accessible book files can be created with little effort by the publisher. Books can be converted to EPUB by exporting the file as EPUB in Adobe InDesign. As one of, if not the most popular industry layout design softwares (81.25% of respondents to our survey cited they use InDesign or Adobe Suite[50]), InDesign is likely used and understood by many people in any publishing firm already and the cost of money and time for a publisher to export a file into EPUB is comparatively minor (at its most expensive, Adobe InDesign costs US$20.99 per month and a publisher will use the program for many tasks over the course of production for each book[51]). Furthermore, BookNet Canada data shows that 43 percent of publishers surveyed had already adopted EPUB3 in 2017, rendering the difference nearly

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[46] Department of Canadian Heritage, "Results: Publisher Accessibility Survey," internal document, October 16, 2018.
[47] "Results: Publisher Accessibility Survey."
[48] BookNet Canada, "The State of Digital Publishing in Canada 2017," issuu, May 2018, https://issuu.com/booknetcanada/docs/bnc-research_state-of-digital-2017/2.
[49] Department of Canadian Heritage, "Results: Publisher Accessibility Survey," internal document, October 16, 2018.
[50] "Results: Publisher Accessibility Survey."
[51] "Creative Cloud Pricing and Membership Plans," Adobe Creative Cloud, accessed October 4, 2018, https://www.adobe.com/ca/creativecloud/plans.html?single_app=indesign&promoid=1FJDDNC6&mv=other.

negligible.[52] If a publisher (traditional, self, or other) does not have access to InDesign, they can use free conversion software online (such as Amazon's Kindle Create,[53] Google Docs,[54] or Apple Pages[55]) to convert their files to EPUB. Similarly, DAISY talking book files can be created with free software such as Obi[56] or with more expensive software such as Dolphin Publisher (starting at US$3,540 for commercial or for-profit organizations with an additional US$2,505 per subsequent user and US$590 per upgrade[57]). All of these programs may require employee training to be able to use them, which can come at an additional cost to the publisher. Creating accessible files in these ways is straightforwardly and regularly accomplished by publishers and their doing so helps make more books accessible to more Canadians.

Braille production, while not extremely complicated for the right person with the right technology, is unlikely to be taken on by book publishers themselves. Furthermore, the costs involved (the purchase of and training for a braille embosser, for example) compared to the return on investment make braille production a poor business choice for publishers. Publishers may go through a braille printing house or transcription service to have their books printed in braille, but this is costly as well. CELA and NNELS are valuable for this purpose because they have the equipment and expertise already in place to convert books to braille (more on these organizations in 3.b). This process is driven by the reader (the demand) rather than the publisher (the supply).

Narrated audiobooks are another large cost that publishers may not want to incur on their own. CNIB and similar not-for-profit organizations charge approximately $3,500 for a finished product of six hundred pages, and other, for-profit audiobook producers will charge between $4,500 and $6,000 (depending on the hourly rate of the narrator) for a book of the same length.[58] Due to these high costs and a potentially low return on investment, it may be best for publishers to rely on the services of CELA and NNELS for audiobook creation at the request of their users, for the same reason that these organizations are already well equipped with the knowledge, skills, and relationships necessary to produce these accessible formats.

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[52] BookNet Canada, "The State of Digital Publishing in Canada 2017," issuu, May 2018, https://issuu.com/booknetcanada/docs/bnc-research_state-of-digital-2017/2.
[53] "Kindle Create," Amazon Kindle Direct Publishing, accessed October 4, 2018, https://kdp.amazon.com/en_US/help/topic/GHU4YEWXQGNLU94T.
[54] "Google Docs," Google, accessed October 4, 2018, https://docs.google.com.
[55] "Pages," Apple (CA), accessed October 4, 2018, https://www.apple.com/ca/pages/.
[56] "Download," DAISY Consortium, accessed October 4, 2018, http://www.daisy.org/obi/download.
[57] "Publisher Pricing," Dolphin Computer Access, accessed October 4, 2018, https://yourdolphin.com/product/pricing?pid=9.
[58] Deborah Nelson, email message to Julie Fairweather, August 22, 2018

Adopted in Marrakesh on June 27, 2013 the Marrakesh Treaty's stipulations required twenty countries to ratify or accede before it could be entered into force. Exactly three months after Canada became the twentieth country to accede to the treaty, it was entered into force on September 30, 2016. The main goal of the Marrakesh Treaty is to remedy what the World Blind Union refers to as the "book famine" by allowing for more of the world's books to be made available in formats accessible to people who live with print disabilities. The currently low percentage of these formats is partly due to restrictive copyright laws, which are what the treaty aims to rectify throughout its signing countries. Countries that ratify the treaty are required to include a copyright exception that allows for people with print disabilities (and organizations acting on their behalf) to bypass current copyright restrictions in order to access the materials they need. The Marrakesh Treaty also allows for the import and export of accessible materials between its member countries, again bypassing permissions from the copyright holder.[59] The Marrakesh Treaty reflects that it does have the rights of content creators in mind, as its preamble emphasizes the importance of copyright protection and maintaining a balance between the rights of authors and the larger public interest by the treaty's contracting parties.[60]

On June 22, 2016, in accordance with the Marrakesh Treaty, Canada assented to Bill C-11: An Act to amend the Copyright Act (access to copyrighted works or other subject-matter for persons with perceptual disabilities). This bill added the following amendment to the Copyright Act:

> 32 (1) It is not an infringement of copyright for a person with a perceptual disability, for a person acting at the request of such a person or for a non-profit organization acting for the benefit of such a person to . . . reproduce a literary, musical, artistic or dramatic work, other than a cinematographic work, in a format specially designed for persons with a perceptual disability.[61]

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[59] "The Treaty of Marrakesh Explained," World Blind Union, accessed October 4, 2018, http://www.worldblindunion.org/english/news/Pages/The-Treaty-of-Marrakesh.aspx.

[60] "WIPO-Administered Treaties: Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired or Otherwise Print Disabled," World Intellectual Property Organization, June 27, 2013, http://www.wipo.int/treaties/en/ip/marrakesh/.

[61] Parliament of Canada, Government of Canada, "Government Bill (House of Commons) C-11 (42-1) – Royal Assent - An Act to amend the Copyright Act (access to copyrighted works or other subject-matter for persons with

While it is not a requirement of the Marrakesh Treaty, Canada's Act to amend the Copyright Act also includes a limitation on the above amendment:

> (2) Subsection (1) does not apply if the work or other subject-matter is commercially available . . . in a format specially designed to meet the needs of the person with a perceptual disability referred to in that subsection.[62]

These amendments provide more access to printed materials for those who may not be able to easily access them otherwise. For publishers, this means that, unless they already have an accessible version of a book (which may mean any number of formats (see 2.b)) on the market, their product may be reproduced without the publisher's explicit permission, and without the publisher seeing any extra compensation. This is probably not as bad as it sounds; in the bigger picture, a copyright exemption such as the one allowed to people with perceptual disabilities is unlikely to cause any significant disturbance in a publisher's overall sales.

### 3.a.iv.(3): Priority

While most publishers see accessibility as an important issue in book publishing, they unfortunately cannot dedicate more efforts to it in their daily schedules. 41.07% of publishers responded to the survey saying that offering accessible versions of their titles is a moderate priority, while fewer than 4 percent of publishers see it as not a priority. According to comments received, many publishers think accessibility is important, but it is not high on their to-do list for a number of reasons, including the lack of information, demand, return on investment, staff, and resources. Furthermore, most publishers agreed that accessibility being low on the priority list is *not* a barrier to their production of accessible formats.[63] As discussed above, many Canadian publishers are very small and lack the staff and resources to dedicate much energy into an endeavour that is not highly supported by demand and is unlikely to result in a large return on investment. In the broad picture, it would be difficult to find someone who

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perceptual disabilities)," Parliament of Canada, June 22, 2016, http://www.parl.ca/DocumentViewer/en/42-1/bill/C-11/royal-assent.

[62] Parliament of Canada, Government of Canada, "Government Bill (House of Commons) C-11 (42-1) – Royal Assent - An Act to amend the Copyright Act (access to copyrighted works or other subject-matter for persons with perceptual disabilities)."

[63] Department of Canadian Heritage, "Results: Publisher Accessibility Survey," internal document, October 16, 2018.

does not believe that it is important for all Canadians to access the books they need or want to read, but unfortunately having all books available in accessible formats does not make as much financial sense. Part 4 of this report explores this topic further.

## 3.b: Third-party organizations' role in accessible format production

In Canada, the National Network for Equitable Library Service (NNELS) and the Centre for Equitable Library Access (CELA) are the two national library organizations that specialize in alternate format production and distribution. Each provides accessible print materials to libraries in the provinces and territories from whom they receive funding in both physical library spaces and online.

NNELS was launched on December 3, 2013 as a digital collection of downloadable accessible format materials. They are funded by the provincial and territorial governments of British Columbia, Alberta, Saskatchewan, Manitoba, Nova Scotia, Northwest Territories, Nunavut, and Yukon, and their principal service partner is the BC Libraries Cooperative. NNELS provides electronic files to these provinces' and territories' public libraries, which library members can access in common standard formats such as DAISY, MP3, e-text, electronic braille, PDF, and EPUB.[64] NNELS does much of its alternate format production in-house, and works closely with volunteers, provincial and territorial educational and scholarly sectors, and alternate format organizations to help produce and distribute the accessible titles.[65]

The CNIB Foundation (founded in 1918 as The Canadian National Institute for the Blind) is a not-for-profit organization dedicated to improving the lives of blind Canadians. CNIB provides services such as job placement programs, guide dogs, braille literacy and other blindness education workshops, recreational programs, and accessible technology and technology support. Up until CELA assumed CNIB's library services in April of 2014, CNIB also played a large role in the production and distribution of accessible reading materials.

CELA is the not-for-profit organization that acts as CNIB's public service library partner. It was launched on April 1, 2014, inheriting and expanding upon services that had previously been provided by CNIB.

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[64] "National Network for Equitable Library Service," NNELS, accessed October 4, 2018, https://nnels.ca/.
[65] Sabina Iseli-Otto, phone conversation with the author, November 8, 2018

CELA receives funding from and provides services for Northwest Territories, Alberta, Saskatchewan, Ontario, Québec, New Brunswick, and Prince Edward Island. Services are also provided through individual library subscriptions to over half of British Columbia and Manitoba residents, and to former CNIB clients in Yukon, Nunavut, Nova Scotia, and Newfoundland and Labrador who had previously subscribed to CNIB's library before the formation of CELA, even though these provinces and territories do not provide provincial or territorial government funding.[66]

eBOUND Canada is an independent not-for-profit organization dedicated to advancing Canadian publishers' engagement in the digital marketplace. While it cannot be said that every digital book is completely accessible, the vast majority of audiobooks and ebooks provide at least some form of accessibility. Even a fixed-layout PDF can be more accessible than a physical book for someone with a physical disability that prevents them from holding a book, for example. In this way, getting into the digital marketplace is a stepping stone for publishers in providing more accessibility options for their readers. eBOUND provides services such as digital asset management, e-production, marketing, metadata management, conversion services, and professional development to Canadian-owned publishers. According to BookNet's "The State of Digital Publishing in 2017," 47 percent of English-language Canadian publishing firms are eBOUND members.[67] eBOUND has established partnerships with many influential retail vendors and wholesale partners including Kobo, Amazon, iBooks, Barnes & Noble, Scribd, OverDrive, EBSCO, and JSTOR to get their members' books to those who need them.[68] Canadian publishers face challenges in bringing their books to a US-saturated market, and organizations like eBOUND help these publishers, especially smaller ones that may need the most help, to navigate the industry and promote Canadian digital content. This aid comes at a cost of course, and organizations like eBOUND rely on ad hoc government funding for their projects. In a submission to the Department of Heritage, eBOUND reported the following:

> While [government] investment in [the organizations who receive funding from the Support for Organizations component of the Canada Book Fund] is tied to project activity and is allocated in one or two-year agreements, the work of some organizations, such as BookNet and eBOUND is

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[66] Albert Ruel, "AEBC/CCB National Conference Call: CELA Detailed Notes, July 27, 2016," Alliance for Equality of Blind Canadians, August 31, 2016, http://www.blindcanadians.ca/participate/blog/2016/08/aebcccb-national-conference-call-cela-detailed-notes-july-27-2016.

[67] BookNet Canada, "The State of Digital Publishing in Canada 2017," issuu, May 2018, https://issuu.com/booknetcanada/docs/bnc-research_state-of-digital-2017/2.

[68] "Retail & Wholesale Partners," eBOUND Canada, accessed October 4, 2018, http://www.eboundcanada.org/about/retail-wholesale-partners/.

ongoing. These technology projects must keep pace with changes in technology affecting the industry and consequently must continuously update their systems. Greater flexibility in grants and contributions to associations would better sustain the organizations that support the creators and cultural businesses responsible for great Canadian content – and would strengthen our sector's ability to innovate.[69]

Clearly more financial assistance is needed to support the digital book ecosystem of Canada, especially in the much smaller market of accessible digital content.

## 3.c: Section summary

This section analyses the current landscape of accessible publishing in Canada and does so with the information provided by a survey that was sent by the Canada Book Fund to English-language, trade book publishers in Canada. This survey was the first step to further research on this topic and will help inform the Department of Canadian Heritage in its decision-making surrounding this issue in the future. The survey provided data but also opened a pathway to important discussion with stakeholders that will hopefully help bridge the knowledge gap through meaningful consultation.

The current situation for people with print disabilities is that when they require an accessible format of a book, they make a request to their public library, who then submits a request to CELA or NNELS, who makes a request to the publisher. Usually the publisher is cooperative and willingly provides their files so that CELA or NNELS may reproduce the book in an accessible format. These third parties play a large role in the conversion of books to accessible formats, and they will continue to be important to this endeavour.

The largest takeaway from the results of our survey was that there is not enough money available for more books to be published in an accessible format in Canada. Part 4 of this report will explain how the government can help remedy some of the existing challenges identified by our survey through additional funding.

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[69] eBOUND Canada, "Canadian Content in a Digital World: Submission to Canadian Heritage," accessed October 4, 2018, https://www.canadiancontentconsultations.ca/system/documents/attachments/908e0cc8060151afa6f72b8aa0b0 1196ada918ec/000/004/839/original/Canadian_Content_in_a_Digital_World_eBOUND_Canada.pdf?1481230363.

# 4: Suggestions as to the role of the Government of Canada in advancing accessibility in Canadian book publishing

This is not the first time that a solution to the problem of print accessibility in Canada has been pursued. In 2007 the Initiative for Equitable Library Access (IELA) was announced, which consisted of $3 million provided to Library and Archives Canada (LAC) over three years in order to "create the conditions for sustainable and equitable library access for Canadians with print disabilities."[70] IELA was structured around the following five workstreams, with the expectation that LAC would report back to the Minister of Canadian Heritage:

1. Introduce new service standards in support of equitable library access
2. Develop and launch an Internet Portal for materials in multiple formats (MMFs)
3. Secure the participation of publishers and producers of MMFs [such as CELA and NNELS] in efforts to strengthen equitable access
4. Develop an electronic clearinghouse linking publishers and producers of MMFs.
5. Develop a nation-wide strategy to provide equitable library access to Canadians with print disabilities.[71]

By 2010, it was determined that the overall initiative was not on track to "achieve its intended goals within the specified timeframe and budget,"[72] and so the primary focus was directed toward the fifth workstream, the development of a nation-wide strategy. The IELA was eventually unsuccessful in reaching a consensus on how best to proceed with a national strategy considering the stakeholders involved, and as a result, the project was terminated. In the end, $1.5 million (half of the original $3 million) was returned to the Consolidated Revenue Fund. According to its Final Report, the Initiative did not succeed because of its diminishing relevance as the external environment changed; a failure to consider alternative models and implementation strategies in earlier stages of implementation, which led to overly ambitious goals and high expectations from stakeholders; and lack of consistent management in the project's early stages. The final report also relayed several "lessons learned" that might be of use if a similar project were to be attempted, including suggestions of careful expectation

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[70] Library and Archives Canada Government of Canada, *Summative Evaluation – Initiative for Equitable Library Access: Final Report*, 2013, http://publications.gc.ca/collections/collection_2013/bac-lac/SB4-11-2012-eng.pdf.
[71] Government of Canada, *Summative Evaluation – Initiative for Equitable Library Access: Final Report*.
[72] Government of Canada, *Summative Evaluation – Initiative for Equitable Library Access: Final Report*.

management, close management oversight, consultations with other jurisdictions undertaking similar projects, and consideration of the rapid evolution of technology.[73]

All things considered, the Government of Canada views accessible publishing as a priority which will eventually need to be addressed. If the government is open to releasing funds for this endeavour, it can either provide this funding to publishers directly so that they may render their books accessible in-house, or to organizations that facilitate the creation and circulation of accessible materials.

The first suggestion, funding publishers themselves, would allow accessible books into the market without the need for a person with a print disability to go through a third-party service organization in order to access the materials. In accordance with the copyright exemption (outlined in 3.a.iv.(2)), someone with a perceptual disability, or someone acting at their request, can reproduce a printed work in an accessible format, *unless* this printed work is already commercially available. If publishers provide accessible versions of their books, those that need them could buy them directly, bypassing the copyright exemption. This approach is feasible, but publishers would need to have the technology to create accessible formats and the training to use it, which would come at a cost (see 3.a.iv.(1)). The answer could be government funding. Once the software and/or hardware and training have been established within a publishing firm, theoretically that firm would become self-reliant and require less funding in the long run. Hence, this funding could potentially be administered for a finite number of years and there would not need to be an ongoing program, making it less expensive overall for the government. Publishers could also contract a braille printing house, audiobook creator, or a similar service, but this too would cost money. One of the comments received on our survey to publishers was "where several publishers serve target audiences . . . it could be more efficient to have access to a general service (for example, in developing enhanced audio or video files[74])," so we know this idea is already being considered in the industry, as long as there was the funding to support it. 47.06% of publishers who responded to our survey chose "Access to a third-party service" as the most beneficial support in producing more accessible books. The problem with funding publishers to provide accessible formats of their books (whether they take on the responsibility themselves or they contract a third party to do it) is that the conversion of *all* books to accessible formats may not be worthwhile (relative to the demand) and therefore may be an unnecessary cost to publishers. 53.57% of publishers who answered

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[73] Government of Canada, *Summative Evaluation – Initiative for Equitable Library Access: Final Report*.
[74] Department of Canadian Heritage, "Results: Publisher Accessibility Survey," internal document, October 16, 2018.

the question "What are the biggest barriers to your publishing business in making titles more accessible?" on our survey responded that projected revenue is low.[75] The demand is comparatively low for accessible formats and it may be most wise to leave the triage up to CELA and NNELS to determine which books are in demand in accessible formats. Another issue with this potential avenue is that, while more books will become available in the market, that doesn't necessarily mean more people with print disabilities will be able to access them. Many people, not just those with print disabilities, use their public libraries to access books and resources for free, especially if they cannot afford them otherwise. If a publisher makes accessible books available in the marketplace, someone with a print disability *cannot* use the copyright exemption to access them and would need to pay full price, potentially limiting their access. By placing the responsibility of creating books for people with print disabilities into the hands of publishers and taking it away from libraries and the organizations that supply them, we may effectively be limiting access to these books altogether.

Rather than provide funding directly to book publishers, the Government of Canada could instead provide funding for third-party organizations, such as CELA and NNELS. CELA and NNELS are not currently eligible for CBF funding; however, if these organizations had access to more capital, they could work to bring more books into accessible formats before they have been requested and a copyright exemption becomes necessary: a proactive approach rather than a reactive one. Essentially, these intermediary organizations could buy books from publishers to regenerate them in accessible formats. CELA and NNELS may have a better grasp on what the demand will be and can act accordingly by making informed decisions on which books to reproduce; this would be more streamlined than having publishers produce all books in accessible formats themselves, but the problem still remains that we may wind up with more accessible books than are actually needed. However, this option is superior to the one above because these books would be available for free in public libraries. As organizations acting on behalf of people with print disabilities, CELA and NNELS are able to reproduce works using the copyright exemption and the reader can access the book through their library without having to pay. Funding CELA and NNELS seems like a more appropriate path than funding publishers to perform this role, as these organizations already have a solid foundation for creating these formats in the first place including expertise, knowledge, resources, technology, and rapport with businesses and clients. While this plan may be the better choice of the two mentioned so far, it falters financially because funding for

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[75] Department of Canadian Heritage, "Results: Publisher Accessibility Survey," internal document, October 16, 2018.

intermediary organizations would probably need to be ongoing in order for them to continue buying books in a proactive way.

Unfortunately, neither one of these two options is perfect; however, the Government of Canada is committed to the pursuit of accessibility for all Canadians, so hopefully we will see steps taken in this direction in the future. If funds were released, a potential program change to promote the production of accessible print materials would possibly fall under the Canada Book Fund's jurisdiction.

## 4.a: Possible ways in which the Canada Book Fund can help solve problems faced by Canadian book publishers

If the Government of Canada were to release funds for this endeavour, there are several steps that could be taken by the Canada Book Fund to encourage support for publishers and organizations in making their books more accessible. The Canada Book Fund could collaborate with another government body on a program to assist publishers or third-party organizations in putting more accessible books into the hands of those who need them. Suggestions for possible collaborations are Employment and Social Development Canada (ESDC) and Library and Archives Canada (LAC), who are already equipped with the knowledge and resources needed to undertake such a project. One of the drawbacks to working with LAC, however, is that they may be reluctant to face the same difficulties as they encountered with the 2007 Initiative for Equitable Library Access that eventually resulted in the project's termination (see 4 for more details).

There are already specific criteria publishers must meet in order to be eligible for funding through the Canada Book Fund (see 3.a.i) and so the CBF could potentially consider adding a criterion that requires publishers to publish at least one accessible book each year (the term "accessible" would need to be defined for the sake of this criterion). This option is not the most attractive, because the current list of criteria is already rather demanding and keeps many publishers from applying. A mandatory criterion for accessible publishing will come across as yet another hoop through which publishers must jump in a comparatively small book industry that relies heavily on its federal funding.

Rather than force publishers to abide by a new, mandatory accessibility criterion, the Canada Book Fund could instead explore the opportunity of dedicating money to an accessibility incentive, with which

publishers who meet certain criteria in accessibility publishing may be eligible for additional support. Of course, with the Canada Book Fund already being oversubscribed, there would need to be additional funds released for this accoutrement to be possible, or the CBF would risk frustrating recipient publishers and organizations by rerouting the funding already allocated to the current programs. Assuming additional funds could be granted to the CBF, an accessibility incentive would probably be the most appropriate path to choose. But where might this incentive fit into the current programs?

Currently, the Canada Book Fund's two program components, Support for Publishers and Support for Organizations, contain subcomponents: Support for Publishers comprises Publishing Support and Business Development, and Support for Organizations is broken into supports for Marketing, Technology, Professional Development, and Internship projects. An accessibility incentive could be inserted into Support for Publishers' Publishing Support component where there is already a similar incentive available: a supplementary amount based on eligible export sales, designed to encourage publishers in their export of Canadian-authored titles.[76] Additional incentives for the purchase of software or hardware needed to produce accessible formats, or for the training of staff to use such technologies, could be added to the Business Development portion of Support for Publishers or the Technology or Professional Development sections of Support for Organizations. The possibility that an entirely new subcomponent could be added in order to directly address publishers' pursuit of creating books in more accessible formats could be discussed.

An incentive in Support for Publishers could reward publishers for the number of accessible titles produced that meet an agreed-upon standard, similar to the export marketing supplement. This could either be a lump sum (if a publisher meets the criteria for a number of accessible books produced, they receive the supplement) or a rolling supplement (the more accessible books a publisher produces, the more funding they receive). Some funding could be allocated to the Business Development component to support publishers' capacity in acquiring and training on new technologies. Another option might be to allocate some funding to publishers who freely share their files with CELA and/or NNELS without requiring these organizations to go through copyright exemptions to access them.

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[76] Department of Canadian Heritage Government of Canada, "Application Guidelines – Support for Publishers: Publishing Support," grants and funding opportunities;service description, Canada Book Fund, February 1, 2018, https://www.canada.ca/en/canadian-heritage/services/funding/book-fund/publishing-support/application-guidelines.html.

In Support for Organizations, the CBF could allocate funding to organizations such as eBOUND (which is currently eligible for funding under Support for Organizations), and/or CELA and NNELS (which are not currently eligible under Support for Organizations) to produce accessible formats of books and to make them available to people with print disabilities. Given their eligibility to the program, these organizations could also be responsible for assisting publishers in accessible format production and providing professional development and other training to publishing firms. Many festivals and forums are already supported through Support for Organizations; perhaps workshops and professional development dedicated to the production and distribution of accessible materials could be funded through the CBF. These events could offer the opportunity to bring together publishers, alternate format producers, people with print disabilities, and organizations acting on the behalf of people with print disabilities to nourish relationships and partnerships and to discuss alternate format production.

## 4.b: Section summary

Because we know that funding is the largest barrier standing in the way of Canadian publishers producing more accessible titles, the best plan of action for the government to take is probably to release additional funds for this endeavour. By assessing the current landscape and the difficulties faced by publishers, we were able to speculate on some potential paths the Government of Canada could take in order to best allocate its funding. All of the recommendations explored in this section are reliant on the government's ability or willingness to release the necessary funds. Because the Government of Canada sees accessibility for all Canadians as a priority, it is in the realm of possibility for this money to become available, although there are currently no plans in place for this to happen. If funds were to be released, the government could choose to fund publishers, who may use the additional money to create more accessible titles in-house or may contract third-party organizations who have the equipment and expertise; organizations such as the Centre for Equitable Library Access (CELA) and the National Network for Equitable Library Service (NNELS); or a combination of the two. As the body directly responsible for funding book publishers and organizations, the Canada Book Fund is the most likely candidate for administration of this allocated funding; therefore it is wise to be prepared and knowledgeable regarding the current industry. Our survey is the first step in this and has helped to identify the possible avenues the Government of Canada and the Canada Book Fund may take in addressing accessibility in the Canadian, English-language trade book publishing industry.

# Conclusion

Accessible publishing in Canada is not a simple topic. There are many moving parts and many parties involved. In Part 2 of this report we identified the multi-faceted label of "print disability" and explored the needs of people with these disabilities and current methods of meeting these needs. The term "print disability" is complex and affects a diverse population of people with varying ages, education, access to resources, and lifestyles. Education and research are necessary to continue the conversation and the pursuit of making more print materials accessible to more Canadians.

Part 3 of this report outlined new research undertaken by the Canada Book Fund that will be used to inform and support decisions made by the Department of Canadian Heritage in moving forward to solve some barriers to access. This survey acts as the preliminary stepping stone between the information gathered in Part 2 of this report and the potential solutions identified in Part 4. We learned that the current system of providing accessible formats of books is not perfect in Canada, but some barriers may be alleviated with the help of additional funding.

In Part 4 we speculated on potential solutions to the lack of accessible print materials. As this research was undertaken in part by the Canada Book Fund, the solutions are focused around financial support from the government. As lack of funding was the largest barrier identified by the survey, a few options that might be considered are for the government to allocate funding to publishers or publishing organizations, or a combination of the two.

As it stands right now, not every single book published in Canada is accessible to all Canadians, but with the commitment of the Government of Canada to address the needs of people with print disabilities, we may see a shift towards a more accessible book industry. The Department of Canadian Heritage and the Canada Book Fund have potential to be instrumental in guiding the industry in producing more titles in accessible formats and making sure they are available to the people who need them. Hopefully we will see funding dedicated to this endeavour, but already the conversations initiated by the ESDC Working Group have put the wheels in motion for more knowledge to be shared, research to be done, and relationships to be arranged. Overall, the more we know the better, and as long as publishers continue to educate themselves on the needs of people with print disabilities, the industry as a whole can continue moving towards turning the page to a more accessible Canada.

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# Appendices

## Appendix A: Working Group Members List[77]

| | Organization | Name |
|---|---|---|
| Government of Canada | Office for Disability Issues | Krista Wilcox (Co-Chair) |
| | Library and Archives Canada | Alison Bullock |
| | Canadian Heritage | Julie Fairweather |
| | Innovation, Science and Economic Development | Carmen Gervais |
| Not for-profit organizations and consumer groups | Spinal Cord Injury Canada | Bill Adair (Co-Chair) |
| | Canadian National Institute for the Blind | Diane Bergeron |
| | Centre for Equitable Library Access | Michael Ciccone |
| | Alliance for Equality of Blind Canadians | Marcia Yale |
| | Canadian Council of the Blind | Gerry Chevalier |
| | Canadian Federation of the Blind | Mary Ellen Gabias |
| | Council of Canadians with Disabilities | John Rae |
| | National Network for Equitable Library Service | Diana Davidson |
| | Canadian Federation of Library Associations | Teresa Johnson |
| Publishing and technology industry representatives | Association of Canadian Publishers | Erin Mallory |
| | DAISY Consortium | George Kerscher |
| | Brady Type | Laura Brady |
| | Ryerson University (Magazine industry representative/perspective) | Stephen Trumper |
| | Bibliothèque et Archives nationales du Québec | Chloé Baril |
| | Association nationale des éditeurs de livres | Éveline Favretti |
| National Indigenous Organizations and representatives | B.C. Aboriginal Network on Disability Society | Neil Belanger |
| | Assembly of First Nations | Marie Frawley-Henry |
| | Springtide Resources | Melanie Marsden |

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[77] Canada, Employment and Social Development Canada, "Working Group (WG) Members List," internal document, 2018

## Appendix B: Survey sent to 2017/18 Recipients of the Canada Book Fund[78]

The Department of Canadian Heritage is conducting a survey of English-language trade book publishers who applied for funding through the Canada Book Fund in 2018-2019.

This survey, which will be online between **[date]** and **[date]**, is made up of 14 questions. The purpose of this survey is to measure the extent to which Canadian English-language trade books are accessible to all Canadians.

We encourage you to complete the survey; it is expected to take about 10 minutes to complete. Participation is voluntary, and all questions in the survey are optional. For statistical purposes, only one completed survey per firm is requested.

All information collected will be handled in accordance with the *Privacy Act*:

- The anonymity of respondents will be respected.
- All responses will be kept strictly confidential.
- Questions are asked for statistical purposes only and will not be used to identify respondents.

Thank you in advance for your participation.

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Definition of accessible materials: text that has been made available in an alternate format or formats designed to aid or replace the reading process for persons who are blind, have low vision, and/or have a disability that interferes with their ability to interpret written text and/or interact with physical printed material.

Examples of accessible materials may include but are not limited to: printed braille, audiobooks formatted to the DAISY standard, digital books formatted to the EPUB 3.1 standard, dyslexia-friendly fonts, large print, and/or tactile or described images. (Please note this is not an exhaustive list of all accessible materials and your titles may offer other accessibility formats and/or features not listed here.)

1. What percentage of your titles (both back- and frontlist) are offered in at least one accessible format that matches the definition above?
   a. 0%

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[78] Department of Canadian Heritage, "Publisher Accessibility Survey," internal document, 2018

b. 1-10%

c. 11-20%

d. 21-30%

e. 31-40%

f. 41-50%

g. 51-60%

h. 61-70%

i. 71-80%

j. 81-90%

k. 91-100%

l. Don't know

Comment:

2. How much of a priority is it for your firm to offer accessible versions of its titles?

a. Not a priority at all

b. Low Priority

c. Moderate priority

d. High priority

e. Don't know

Comment:

3. What are the biggest barriers to your publishing business in making titles more accessible?

(Check all that apply)

a. Access to technologies

b. Costs are high

c. Projected revenue is low

d. Staff availability

e. Don't know enough about the subject or technologies involved

f. Accessibility is a low priority

g. Digital rights management concerns

```
[                                    ]
```

h. Other (please explain)

```
[                                    ]
```

Comment:

---

4. How many of your **print** titles offer the following functions?

|  | All titles | Most titles | Some titles | Few titles | No titles | Don't know |
|---|---|---|---|---|---|---|
| Braille |  |  |  |  |  |  |
| Tactile images |  |  |  |  |  |  |
| Dyslexia-friendly fonts |  |  |  |  |  |  |
| Large print |  |  |  |  |  |  |

```
[                                    ]
```

Comment:

---

5. How many of your **digital** (audiobooks and ebooks) titles are offered in the following formats?

|  | All titles | Most titles | Some titles | Few titles | No titles | Don't know |
|---|---|---|---|---|---|---|
| Audiobook in DAISY standard |  |  |  |  |  |  |
| Ebook in DAISY standard |  |  |  |  |  |  |
| Ebook in EPUB3.1 standard |  |  |  |  |  |  |
| Audiobook [other than DASIY |  |  |  |  |  |  |

| standard] | | | | | | |
|---|---|---|---|---|---|---|
| Ebook [other than EPUB3.1 or DAISY standards] | | | | | | |

Comment (optional):

6. How many of your **ebooks** (other than EPUB3.1 or DAISY standards) offer the following functions?

| | All titles | Most titles | Some titles | Few titles | No titles | Don't know |
|---|---|---|---|---|---|---|
| Text-to-speech | | | | | | |
| Reflowable (as opposed to fixed-layout) | | | | | | |
| Descriptive ALT text | | | | | | |
| Embedded print-equivalent page numbers | | | | | | |
| HTML5 tags (to create a logical reading order) | | | | | | |
| Accessible metadata | | | | | | |
| Accessible, nested table of contents that includes all heading levels | | | | | | |

| Described audio or video | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | |

| |
|---|
| |

Comment:

---

7. How many of your titles are *initially* published in an accessible format (rather than converted to an accessible format *after* publication of the non-accessible format)?

    a. All of our titles

    b. Most of our titles

    c. Some of our titles

    d. A few of our titles

    e. None of our titles

    f. Don't know

| |
|---|
| |

Comment:

---

8. How do you create accessible formats of your titles (Check all that apply)?

    a. In-house

    b. Third-party producer

| |
|---|
| |

Comment:

---

9. What in-house software, hardware, and/or processes do you use to create accessible formats of your titles? List all that apply

| |
|---|
| |

| |
|---|
| |

Comment:

_____

1. Which company or companies do you use to create accessible formats of your titles? List all that apply

[                                                                    ]

[                                        ]

Comment (optional):

_____

2. In order to create titles that are more accessible, which of the following would be more beneficial?

   a. Training and technological capacity to do this in-house
   b. Access to a third-party service

      [                                        ]

   c. Other (please explain):

[                                            ]

Comment:

_____

## Demographic data

3. In what region of Canada are your operations mainly located?

   a. British Columbia or Territories (Northwest Territories, Yukon, Nunavut)
   b. Prairies (Alberta, Saskatchewan, Manitoba)
   c. Ontario or Quebec
   d. Atlantic (New Brunswick, Nova Scotia, Prince Edward Island, Newfoundland and Labrador)

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4. What are your company's approximate annual net revenues?

    a. Under $200,000

    b. $200,000 – $999,999

    c. $1,000,000 – $4,999,999

    d. $5,000,000 – $9,999,999

    e. $10,000,000 or more

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5. Does your firm identify as an Indigenous publisher? ("A publisher owned and controlled by members of the Indigenous peoples of Canada, which includes First Nations, Métis and Inuit people.")

    a. Yes

    b. No