



Submission to the National Cultural Policy Review

Digital Platforms, Creator Rights and the Case for Inclusion in the PLR and ELR Schemes

StoryBox welcomes the opportunity to contribute to the National Cultural Policy consultation, and congratulates the Government on the achievements of *Revive* and its continuing commitment to a cohesive cross-portfolio framework for arts and culture. We particularly endorse the establishment of Writing Australia and the recognition through *Revive* that authors, illustrators and other literary creators are workers whose contribution to national life deserves structural support.

StoryBox is an Australian digital platform delivering professionally performed and produced video story reads of licensed Australian picture books into schools and public libraries across the country. Approximately 80% of Australian public libraries and 30% of Australian schools subscribe. Almost every title in our catalogue is authored, illustrated and published in Australia. Every viewing is the use of an Australian creator's work.

This submission speaks primarily to Pillar 3, the Centrality of the Artist, and to a discrete but consequential gap in the architecture *Revive* established: the Public Lending Right (PLR) and Educational Lending Right (ELR) schemes do not yet extend to licensed digital storytelling platforms, even when those platforms operate inside the very public and educational libraries the schemes were designed to address. We also touch briefly on Pillar 2 in the context of StoryBox as an all-Australian distribution channel for licensed picture books, and on Pillar 5 in the context of digital platforms as audience engagement infrastructure for early childhood reading. On broader sector questions we defer to the submissions of Books Create Australia and Australia Reads, which we strongly endorse.

About StoryBox

StoryBox produces a library of professional storyreads of licensed Australian picture books. Each story features a skilled storyteller reading a published book aloud, with the book's original licensed illustrations on screen as they read. The experience replicates the warmth of a shared reading moment and is used in schools, public libraries and early learning spaces to deliver more Australian books, to more children, at scale.

All content is licensed directly from Australian publishers/rights holders. StoryBox is not a publisher, not a consumer entertainment service, and not a database. It is a digital lending library of performed picture books, operating under institutional licences to libraries and schools, which provide free access to their patrons and students as part of their public-access and educational mandates.



The Gap in the PLR and ELR Schemes

The PLR and ELR schemes exist to compensate creators for the loss of potential income that occurs when their work is made freely available for multiple use through public and educational libraries. Following successful advocacy by the Australian Society of Authors, the Albanese Government expanded the schemes in 2023 to include ebooks and audiobooks, rightly recognising that the medium through which a reader accesses a work should not determine whether its creator is compensated.

StoryBox strongly supports that expansion. A significant gap remains, however. The current eligibility criteria are defined around the concept of a “book” and its digital equivalents, specifically ebooks and audiobooks. StoryBox’s format - a licensed video reading of a published book showing its original illustrations - does not fit within any of these categories, and creators whose work is accessed through our platform currently receive no PLR or ELR payment for those loans. StoryBox has engaged directly with the Office for the Arts on this question and received written confirmation that audio-visual material is currently ineligible to claim under the schemes. This submission asks the review to address that exclusion as a matter of policy.

A child in a school library watching a storyteller read a picture book on StoryBox is engaging in exactly the same act of borrowing as a child who takes the physical book home. The creator’s work is being used. The creator should be compensated.

Why StoryBox Constitutes a Lending Activity

The principle of PLR and ELR is straightforward: when a creator’s work is made available for free multiple use in a library context, that creator loses potential sales income and deserves compensation. StoryBox meets every substantive criterion of that principle. Content is accessed for free by library users through a platform licensed to the institution. The underlying works are published books, licensed from their publishers/rights holders with royalty entitlements flowing to creators. Each viewing is functionally a loan: a user (school or individual) engages with a single title in a single session. The platform is deployed within the very institutions the schemes were built around.

The most immediate objection is likely to be one of category: StoryBox uses streaming technology, so is it not simply a subscription streaming service of the kind that has never attracted lending right compensation? Streaming, however, is a delivery mechanism, not a business category. Audiobooks accessed through BorrowBox, Libby and other library aggregators are streamed to the user’s device, and ebooks are delivered through digital rights management systems that closely resemble streaming - yet none of this has been a barrier to PLR or ELR eligibility for those formats. StoryBox is also categorically different from Netflix or Spotify, which sell direct subscriptions to individual consumers. StoryBox sells institutional licences to libraries and schools, which then provide free access to their patrons. The institution pays, the end user borrows for free, the underlying works are licensed published books, and royalty entitlements flow to creators based on views. A patron does not subscribe to StoryBox any more than they subscribe to BorrowBox.



The distinction between a video reading and an audiobook is one of format only. An audiobook is a licensed audio performance of a book; a StoryBox story is a licensed audio-visual performance of the same book, with the added dimension of the original illustrations. The definition of eligible formats under PLR and ELR should reflect that reality.

We note, finally, that the licensing payments StoryBox makes do not substitute for PLR or ELR. Royalties flow to publishers/rights holders, and while many pass these on to creators, there is no direct entitlement under our licensing arrangements. PLR and ELR compensate creators for the income foregone when that work is then borrowed, free of charge, many times over, in a library setting. Print books and audiobooks generate both; there is no principled reason a licensed video reading should generate only the former.

- **Recommendation:** That the definition of eligible book formats under PLR and ELR Schemes be extended to include licensed audio-visual readings of published books made available through accredited library platforms.

The Role of the Storyteller

StoryBox's storytellers are skilled creative professionals. They are selected for their ability to bring books to life for young audiences, and their performances are recorded, produced and licensed as an integral component of the product. Under the current PLR audiobook eligibility criteria, a narrator who records a reading of a book is treated as a contributor eligible for compensation. A StoryBox storyteller performing the equivalent role on video is not. This disparity is difficult to justify on any principled basis. The storyteller's creative contribution is at least equivalent to that of an audiobook narrator, and in many cases greater: they perform to camera, engage directly with young audiences, and are often selected for their cultural background, language, or connection to a particular story or community.

- **Recommendation:** That storytellers whose performances are central to such products be recognised as eligible contributors on terms equivalent to those applying to audiobook narrators.

Practical Implementation

StoryBox already maintains, and can supply, the per-title viewing data necessary to operate the schemes on a per-loan basis. A completed reading of a single title by a user in a single session is a discrete event that maps cleanly onto the existing PLR and ELR model. In several respects this is better data than the sampling methodology used for print loans. The administrative architecture of the schemes is not a barrier to inclusion, and because the underlying data infrastructure is already operational, the additional administrative cost of bringing licensed digital storytelling platforms within scope should be modest.



- **Recommendation:** That the Office for the Arts engage with digital library platform providers to develop a practical framework for data collection and payment calculation consistent with the existing per-loan model.
- **Recommendation:** That any expansion be accompanied by appropriate budget provision to ensure the inclusion of digital storytelling formats does not reduce the per-loan rate available to existing PLR and ELR recipients.

A Note on Pillar 2: An All-Australian Catalogue

StoryBox's catalogue is, by design, exclusively Australian: every title is a picture book authored, illustrated and published in Australia, and read aloud by an Australian storyteller. Books Create Australia calls for more Australian content in schools; Australia Reads warns of overseas saturation driven by big technology algorithms and calls for national campaigns promoting Australian stories. StoryBox is a working example of the infrastructure those submissions describe: an institutional channel inside roughly 80% of public libraries and 30% of schools, fully dedicated to Australian-published children's literature. Compensating creators when their work is borrowed through this channel is consistent with the principles of PLR and ELR and with the broader Pillar 2 goal of supporting the platforms through which Australian stories reach Australian readers.

A Note on Pillar 5: Audience Engagement Infrastructure

The way audiences discover and engage with Australian creative work has changed. In the early childhood and primary school space, digital platforms have become a primary discovery pathway rather than a supplementary one. StoryBox already operates as part of that infrastructure in partnership with the wider sector - producing custom recordings for the Australian Library and Information Association's National Simultaneous Storytime, Public Libraries Victoria's Big Summer Read, the Children's Book Council of Australia and the Australian Children's Laureate Foundation. StoryBox stories have also been accepted as countable reads toward Premier's Reading Challenges across multiple states, reflecting informal but meaningful recognition that digital storytelling sits within the same reading ecosystem as print. When the sector mobilises around national reading goals, StoryBox is treated in practice as part of the reading infrastructure. That recognition is worth carrying through into formal policy settings.

In Summary

Australia was the first country in the world to introduce Educational Lending Right. Extending compensation to creators whose works are accessed through digital storytelling platforms would again position Australia at the forefront of equitable cultural policy, and bring the schemes into alignment with how reading actually reaches children in Australian classrooms and libraries today. We welcome the opportunity to provide further information or to participate in any consultation process the Government establishes in response to submissions on this issue.

