



Submission to the Next National Cultural Policy from the Round Table on Information Access for People with Print Disabilities

The Round Table on Information Access for People with Print Disabilities (Round Table) calls on the Australian Government to make born-accessible publishing and distribution core elements of the next National Cultural Policy.

A National Cultural Policy that champions Australian stories but does not ensure those stories can be read by *all* Australians is incomplete.

More than 18% of adult Australians experience a print disability (Vision Australia n.d.). These are people who are blind or have low vision, people with physical disabilities that prevent them from holding or turning the pages of a book, people with learning disabilities such as dyslexia, and people with acquired cognitive or neurological conditions.

Consider a Year 8 student with dyslexia in regional New South Wales. Her school library holds hundreds of titles, but almost none in a format she can read independently. The book vouchers, author visits and reading campaigns her classmates celebrate are, for her, exercises in exclusion. She is not unusual. Across Australia, millions of readers remain locked out of a literary culture that was never designed to include them.

Accessible publishing is not a niche concern – it is a precondition for reading equity and a growing economic opportunity within a book ecosystem with total market size of approximately \$4 billion.

The Round Table's call aligns with the broader sector consensus expressed through the *Books Create Australia* coalition, which explicitly identifies funding for “accessible publishing, inclusive formats and discoverability” as a priority for the National Plan for Books and Reading. Our submission provides the detailed evidence and recommendations to deliver on that commitment.

Executive Summary

This submission asks the Australian Government to take four priority actions within the next National Cultural Policy:

- Legislate for accessible publishing, informed by the European Accessibility Act, through a staged pathway of funded transition support leading to enforceable baseline requirements, and ensure that existing procurement frameworks are consistently applied to educational and library materials.
- Fund born-accessible publishing, with targeted support, training and realistic timelines for smaller and independent publishers, and secure ongoing, legislated funding for alternative format production, including braille and Indigenous language materials.

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- Strengthen libraries as accessible reading infrastructure through national funding, training and standards.
- Ensure that accessible books are identifiable and discoverable through the established supply chain – including publisher metadata, library catalogues, retailer systems and school procurement channels - and invest in accessibility data, research and AI governance for publishing.

About the Round Table

The Round Table is Australia's peak advisory body on reading access for people with print disabilities. Established in 1981, we bring together specialist libraries, publishers, accessible format producers, educational organisations, technology providers and consumers. From every part of this ecosystem, we observe the same persistent gap: Australian books are not consistently available in the formats that readers with print disability need. Our collective expertise positions us to advise Government on practical, evidence-based measures to close that gap.

Why This Matters

Reading access is foundational to education, employment, civic participation and cultural life. Australia is a signatory to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and the Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired, or Otherwise Print Disabled. These commitments oblige Australia to ensure equitable access to published works. The *Disability Discrimination Act 1992* (Cth) further enshrines the right to equal access to goods, services and information.

Despite these obligations, the gap between commitment and practice remains wide. In Australia, while publishers increasingly produce ebooks and digital audiobooks, the vast majority of these titles are not fully accessible – they lack the structural features (such as semantic markup, alternative text for images, navigable tables of contents) that make them usable with assistive technologies such as screen readers and refreshable braille displays.

The economic dimensions of this gap are significant. Australia's book industry generates over \$2 billion in book sales and employs more than 30,000 professionals. When books are not accessible, publishers forgo a readership of millions; authors lose income; and public investment in reading campaigns, library collections and school programs fails to reach the people who need it most. Accessible publishing is not a cost to the sector – it is an investment in a larger, more diverse market.

A National Cultural Policy that does not address this gap will leave Australia's treaty commitments unfulfilled and millions of readers excluded from the cultural life the policy aims to enrich.

A cultural policy that overlooks reading access does not simply fail people with print disability – it undermines the very goals the policy sets out to achieve.

Alignment with the Five Pillars

Inclusive and accessible publishing is not confined to a single pillar of the National Cultural Policy. It is a cross-cutting issue that touches each of the five pillars established under *Revive*:

Pillar 1: First Nations First

According to the ABS Survey of Disability, Ageing and Carers (2022), one in four (25.3%) Aboriginal and Torres Strait Islander people have disability. While significant national efforts are underway to revitalise and teach Aboriginal and Torres Strait Islander languages – with First Languages Australia supporting a network of language centres across the country – braille resources remain extremely limited, and there is no well-established national pathway for their development and production. A braille code for Indigenous languages is under development but without ongoing funding, progress has been slow. Aboriginal and Torres Strait Islander people who are blind or have low vision are effectively excluded from language revitalisation programs that rely on written materials. Ensuring that First Nations languages and stories are published in accessible formats is essential if the policy's commitment to First Nations cultural expression is to be genuinely inclusive.

Pillar 2: A Place for Every Story

A guiding principle of *Revive* states that all Australians, “regardless of language, literacy, geography, age or education” should have the opportunity to access and participate in arts and culture. Yet for 18% of Australians with print disability, this promise remains unfulfilled. When books are published in inaccessible formats, the breadth of stories on offer is irrelevant to readers who cannot access them. Accessible publishing is a prerequisite for delivering on this pillar – and its benefits extend well beyond print disability. Older Australians with changing vision, people with temporary injuries, readers in challenging environments, and speakers of other languages who rely on text-to-speech and adjustable formatting all benefit from publications designed with accessibility in mind. A place for every story requires formats that every reader can use.

Pillar 3: Centrality of the Artist

The centrality of the artist cannot be realised if creators with disability are excluded from the processes of making and publishing their work. Authors and illustrators with print disability routinely encounter inaccessible submission portals, contracts in non-accessible formats, and production workflows that do not support assistive technologies. These barriers compound the underrepresentation of disabled creators on Australian publishers' lists, narrowing the cultural record and limiting the stories available to all readers. An artist-centred cultural policy must address the accessibility of the industry's own infrastructure, not only its outputs, and actively support disabled creators whose lived experience enriches Australia's national literature.

Pillar 4: Strong Cultural Infrastructure

Publishers, libraries, alternative format producers and digital distribution platforms form the infrastructure through which books reach readers. Each link in this chain must be accessible. Currently, publishers lack the knowledge and resources to embed accessibility into standard production workflows; public and school libraries struggle with inaccessible websites, catalogues and collections; digital retail platforms (Amazon Kindle, Apple Books, Kobo, Google Play) vary widely in their support for accessibility features; and specialist organisations that produce braille, audio and other formats operate on precarious, grant-based funding. Strengthening this infrastructure – including the digital platforms that increasingly mediate access to books – is a precondition for achieving the policy's broader goals.

Pillar 5: Engaging the Audience

Building a reading nation means reaching *all* Australians. National reading campaigns, school library investments, author touring programs and book voucher schemes will only achieve their full potential if the books they promote are discoverable and available in formats that everyone can use. Audience engagement strategies must embed accessibility from the outset, not treat it as an afterthought.

Crucially, it is not enough for accessible books simply to be produced – they must also be identifiable and discoverable through the established supply chain of the book industry. This means embedding accessibility information in publisher metadata (such as ONIX), ensuring library catalogues surface accessible formats alongside standard listings, enabling retailer systems to filter and display accessibility features, and integrating accessibility criteria into school procurement channels. Without this end-to-end discoverability, accessible titles risk remaining invisible to the readers, teachers and librarians.

Structural Barriers to Equitable Access

Five systemic barriers prevent equitable access to books in Australia:

1. Australia has no legislation requiring accessible publishing

Australia lags behind comparable jurisdictions in legislating for accessible publishing. Two international developments illustrate the direction of reform:

- The European Accessibility Act (EAA): Adopted in 2019 and enforced from June 2025, the EAA requires ebooks, e-readers and e-commerce platforms across all EU member states to meet baseline accessibility standards. The directive covers a comprehensive range of products and services, signalling a holistic approach to accessibility across the book ecosystem. Businesses benefit from streamlined, harmonised regulations; people with disability gain access to more affordable, accessible products and services. Critically, the EAA now sets the *de facto* global benchmark: any Australian publisher seeking to sell into European markets must already comply.

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- The United States ADA Digital Accessibility Rule: In April 2024, the US Department of Justice finalised a rule under Title II of the Americans with Disabilities Act, requiring state and local governments – including public schools, universities and libraries – to make their websites and digital content fully accessible. While publishers are not directly regulated, they face significant indirect pressure as government agencies increasingly demand ADA-compliant educational materials and digital content. However, in April 2026 the current administration delayed compliance deadlines by a year and signalled its intent to reconsider whether some provisions could be “made less costly”. The weakening of these protections illustrates how vulnerable accessibility gains remain when they depend on executive action rather than robust legislative foundations.

While Australia's *Disability Discrimination Act (DDA)*, the AS EN 301 549 procurement standard and the 2025 AHRC guidance on digital accessibility provide an important foundation, there is no enforceable requirement for commercial publishers, digital platforms or retail channels to meet baseline accessibility standards for the books and publications they sell. Voluntary compliance has proven insufficient. Australia risks falling behind the international standard set by the EAA and failing its own citizens.

2. Publishers lack the knowledge and resources to produce born-accessible digital books as standard practice

Research demonstrates that lack of awareness and technical know-how is a significant barrier to accessibility in Australian publishing. The production of accessible formats has historically been left to ad hoc, not-for-profit organisations converting finished books into alternative formats after publication. Yet modern digital formats, particularly reflowable EPUB files built to the EPUB Accessibility 1.1 standard and the W3C Web Content Accessibility Guidelines (WCAG), can be made accessible at relatively low marginal cost during production, if publishers adopt born-accessible workflows from the outset, that is, workflows in which accessibility is embedded into every stage of the production process, from manuscript preparation through to final output, rather than retrofitted after publication. The barrier is not primarily technological; it is one of knowledge, workforce capacity and industry culture (Mrva-Montoya 2025).

Canada provides a compelling precedent for government intervention. In 2019, the Canadian Government invested CAD \$22.8 million over five years through the Canada Book Fund's Accessible Digital Books Initiative, specifically to help independent publishers integrate born-accessible features into standard digital book production and distribution. The initiative funded workforce training, internship programs, technology projects, backlist conversion and marketing of accessible titles across English and French language markets – with the explicit goal of shifting the supply of accessible books from reliance on copyright exceptions to commercial availability at the time of publication (Government of Canada 2019). Stakeholder evaluations confirmed measurable progress, including increased workforce capacity, new accessible titles, and improved industry infrastructure, while also underscoring that sustained government investment is needed to maintain momentum (Government of Canada 2023). Australia has no comparable program. A dedicated Australian initiative, modelled on the Canadian approach but tailored to the structure and scale of the Australian publishing

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industry, would address the knowledge and capacity gaps that currently prevent born-accessible publishing from becoming standard practice.

3. Alternative format producers operate on precarious funding

The Commonwealth's Print Disability Services Program, administered by the Department of Health, Disability and Ageing, currently funds only two organisations – Vision Australia and VisAbility – through time-limited grants (VisAbility n.d.). While these organisations play a critical role, Australia's accessible publishing ecosystem extends well beyond the current funding model and includes specialist producers, libraries and community organisations with expertise in braille, tactile graphics, DAISY audio and other accessible formats.

These services rely on highly specialised skills and infrastructure that cannot be rapidly rebuilt if funding lapses. Yet the current grant-based approach limits long-term workforce development, innovation and sector capacity at a time of growing demand for accessible materials.

Braille remains a particularly vital format: it supports deep literacy by helping readers understand spelling, punctuation, formatting and grammar in ways that audio alone cannot, and research consistently shows that braille literacy correlates directly with academic achievement and employment outcomes (Ryles 1996; Bell & Mino 2013; Bell & Silverman 2018; McDonnall et al. 2025). Without sustainable investment in braille production, readers with print disability remain excluded from Australia's literary and cultural life.

A national accessibility strategy should expand support beyond the current funding recipients to strengthen the broader accessible publishing sector and ensure long-term, equitable access to books and reading materials across Australia. Replacing short-term grants with ongoing, legislated funding would protect the specialist workforce and infrastructure on which readers with print disability depend.

4. Libraries are under-resourced to provide accessible collections and services

While 98% of Australian public libraries carry digital audiobooks, ebooks and large print editions, a recent national study (Mrva-Montoya et al. 2025) found that only about a quarter of librarians are confident about the accessibility of their websites and catalogues. Significant gaps remain in staff training, knowledge of assistive technologies, and the provision of services for patrons with print disability. The majority of library websites lack basic information about available accessible formats and services. School libraries – critical for early reading development – face even more acute resourcing challenges (ALIA & ACSL 2026). Addressing these issues requires targeted national funding, professional development, and deeper engagement with the print disability community.

5. AI and accessible publishing require dedicated policy safeguards

Artificial intelligence (AI) is rapidly reshaping the publishing industry, and its implications for accessible publishing are profound but largely unexamined in Australian policy. Generative AI (GenAI) presents both significant opportunities and serious risks.

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AI-assisted tools can help generate image descriptions (alt text), automate the remediation of backlist titles to meet accessibility standards, support synthetic narration for audiobooks, and assist with the conversion of complex content into plain language versions. Used appropriately, these tools have the potential to dramatically reduce the cost and time required in producing accessible publications.

However, these benefits depend on strong human oversight and quality assurance. Current AI tools cannot yet reliably perform complex accessibility tasks, such as describing intricate visual content or navigating non-standard document structures without substantial human intervention (Mellins 2025). Research also suggests that AI systems can reproduce and amplify existing biases, embedding exclusions into outputs that readers with disability rely upon (El Morr et al. 2025).

The rapid adoption of AI in publishing also raises concerns relating to author consent, intellectual property, workforce impacts and accountability for accessibility failures. As governments invest in AI capability and digital transformation, accessibility safeguards must be embedded into publishing and educational technology policy from the outset.

What We Ask

The Round Table asks the Government to act on five fronts:

1. Legislate for accessibility

- Following the European Accessibility Act, mandate that publishers, digital platforms, e-reading devices and retail channels meet baseline accessibility standards for ebooks and digital publications sold in Australia, and ensure that existing procurement frameworks – including AS EN 301 549 and obligations under the DDA – are consistently enforced in the purchase of textbooks, digital learning resources and library materials.
- Adopt a staged pathway to legislative reform: first, funded transition support to help publishers – particularly smaller and independent houses – build capacity to meet existing accessibility standards; then, enforceable baseline requirements once the sector has had a realistic opportunity to prepare.

2. Fund born-accessible publishing

- Establish a dedicated program – modelled on Canada's Accessible Digital Books Initiative – to support Australian publishers in adopting born-accessible workflows, with a particular focus on smaller and independent houses that lack the resources to transition unaided. Capacity-building should be delivered through industry associations such as the Australian Publishers Association.
- Fund accessible publishing training for the publishing workforce, integrated into professional development programs and university publishing courses.
- Require accessibility compliance as a condition of any public funding for book publishing and distribution, with phased timelines that give publishers – particularly

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smaller and independent houses – a realistic opportunity to build capacity before obligations take full effect.

3. Secure ongoing funding for alternative format production

- Replace project-based grants with legislated, ongoing funding for alternative format producers to create and distribute braille, audio and other formats.
- Expand the Print Disability Services Program beyond its current scope to support a wider range of specialist producers and formats.
- Invest in the braille transcription workforce, recognising braille as a critical literacy format that requires sustained specialist skills.
- Invest in the development of braille code for Indigenous languages and the production of Indigenous content in braille formats.

4. Strengthen libraries as accessible reading infrastructure

- Commit to a national program of funding and training to ensure public library collections, websites and catalogues comply with WCAG 2.2 accessibility standards.
- Include accessible collections and services for people with print disability as an explicit requirement in any future national school library standards, alongside the provision of accessible educational materials including textbooks.
- Fund professional development for library staff in assistive technologies and accessible service delivery.

5. Invest in accessibility data, research and AI governance

- Commission a national audit of the accessibility of commercially published Australian titles to establish a baseline and inform future policy evaluation.
- Fund research into the use of AI tools in accessible format production, including the development of quality assurance frameworks and industry guidelines.
- Ensure that any national AI governance framework addresses the accessibility of AI-generated content in publishing and education, preventing the technology from widening the accessibility gap.
- Ensure that accessibility information is embedded in publisher metadata standards (such as ONIX), surfaced in library catalogues and retailer systems, and integrated into school and government procurement processes, so that accessible titles are discoverable alongside standard listings.

Alignment with the National Plan

These measures directly support the *Books Create Australia* call for Australian stories, knowledge and ideas to be created, published, discovered, read and valued. They reinforce the calls from across the sector – including from the Australian Society of Authors, Australia

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Reads, the Australian Library and Information Association, and the Australian Publishers Association – for improved discoverability, reading participation, library access and a sustainable publishing industry, while ensuring those benefits extend to *all* Australians, including those with print disability.

When books are born accessible, people with print disability gain equal access to literature, educational materials and the information needed for civic and community engagement. Accessible publishing is not a cost to the sector; it is an investment in a larger, more diverse readership and a more equitable society.

Australia's Marrakesh Treaty obligations, its commitments under the UNCRPD, and the policy goals of *Revive* all point in the same direction: toward a publishing ecosystem in which accessibility is the default, not the exception.

Working with Government

The Round Table would welcome the opportunity to work with the Government on developing and implementing these measures. This includes publishers, libraries, specialist format producers, educators, technology providers, and readers with print disability. We are ready to contribute evidence, expertise, and practical guidance to support lasting reform.

Australia cannot claim to be a reading nation while millions of people remain excluded from books and literary participation because published materials are inaccessible by design. Accessible publishing must become part of Australia's cultural infrastructure. Embedding accessibility in the National Cultural Policy will ensure that Australian stories, knowledge and ideas can be created, discovered and shared by everyone – supporting a truly inclusive reading nation.

In summary, the Round Table asks the Australian Government to: (1) legislate for accessible publishing, informed by the European Accessibility Act, through a staged pathway of funded transition support leading to enforceable baseline requirements, and ensure that existing procurement frameworks are consistently applied to educational and library materials; (2) fund born-accessible publishing, with targeted support, training and realistic timelines for smaller and independent publishers; (3) secure ongoing, legislated funding for alternative format production, including braille and Indigenous language materials; (4) strengthen libraries as accessible reading infrastructure through national funding, training and standards; and (5) invest in accessibility data, research and AI governance, and ensure that accessible books are identifiable and discoverable through the established supply chain – including publisher metadata, library catalogues, retailer systems and school procurement channels.

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