

The Independent Review of the Public Library Service
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The Publishers Association Submission to the Independent Review of the Public Library Service

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The Publishers Association (“The PA”) is the leading representative voice and trade organisation for book, journal, audio and electronic publishers in the UK. Our membership of 115 companies includes publishing houses in the academic, educational and general trade sectors and collectively, their revenues total £5bn. We welcome the opportunity to contribute to this Review.

Publishers have a long standing historic relationship with the public library service. Alongside the commercial engagement between publishers and libraries, our member companies are involved in a range of long term programmes, in partnership with groups such as The Reading Agency and Booktrust aimed at boosting library usage and ensuring libraries are at the heart of their reading community.

This year alone The Publishers Association has been instrumental in two new projects designed to ensure libraries have a prominent role in the future digital reading environment. In February we helped launch the Access to Research programme, through which public libraries are able to provide their users with free access to publishers' websites hosting taxpayer funded academic research via dedicated terminals on the library premises. Over 1.7 million articles are available with over 17 academic publishers 43 library authorities and 500 libraries already participating in the scheme. Secondly, in March, working with the Society of Chief Librarians, The PA launched the e-lending pilot programme. This follows the recommendation of William Sieghart's 2012 report into e-lending in the public library service. Almost 1000 titles have been made available for the pilot which is being trialled in four selected library authorities for 12 months. The aim of the pilot is to inform libraries and publishers of the likely impact on borrowing and purchasing behaviour of the availability of remote (i.e. off premises) lending of e-books.

So, with this historic and on-going close engagement with the public library service, we address ourselves to the three questions posed by the consultation.

What are the core principles of a public library service into the future?

Publishers greatly value the vital role played by libraries in developing audiences and aiding discovery. This is all the more vital in an age in which independent bookstores are increasingly disappearing from the high street, reducing the access to and visibility of books to the general reader. Thus the position of the public library as the focal point for books and reading in the community is going to become all the more important.

The fundamental mission of the public library service should remain the provision of access to books and reading for all, enabling readers to discover new works and authors and build audiences. This is not to say that libraries should not provide many other services as well – such as providing access to information communications technology, community networking or as a

social space for a range of activities. Indeed providing such services may be critical to the sustainability of some library premises and services. However, we believe that the *raison d'être* of the public library service should remain squarely focused on the enabling of access to reading.

In the prevailing economic and political environment it is generally held that public services should only be promoted to address market failure, i.e. providing goods and services in a way which is more efficient than could be done by the private sector, or which the private sector would otherwise simply fail to do. The public library service as currently conceived scores very highly in this regard. Without the service, it is difficult to imagine any commercial entity filling the gap by providing free access to a wide range of reading material to people of all ages, demographic and socio-economic background. Nor is there any private sector entity anxious to enter this market, or regularly complaining to governments that its proposed commercial enterprise is being held back by "unfair state assistance" to the library service. If one compares and contrasts this with the situation between, for example satellite broadcasters and the BBC or private health companies and the NHS, the point is clear.

In delivering free access to books and reading material the public library service has a unique public service mission, which we can and should regard as unimpeachable. Provided this remains front and centre of its activity, it should continue to claim and enjoy widespread support from politicians and the public at large.

This sharp distinction becomes slightly less clear in the realm of the lending of ebooks which, as noted above, was the subject of William Sieghart's previous review, and which continues to be subject to detailed study by libraries and publishers. All publishers agree that readers should have some access to e-books from screens in libraries; and some go further and say that the public library service should have the means to lend ebooks to its patrons. Where some publishers are not currently providing ebooks to libraries, this is less a matter of principle than a concern with the proposed business and lending models - but the two questions are linked. If a public library service seeks to provide ebooks to patrons in a way which too closely emulates that done by commercial players (either publishers or retailers), the public service ethos of the library service can be called into question.

A library might argue that it is acting uniquely insofar as it is providing ebooks for free, whereas commercial companies provide them at a cost to the user. That would be true enough, but where that free provision acts as a competitive threat in the marketplace and undermines the ability of commercial entities to operate fairly, it undermines the validity of the operating model. To put it another way, it is not market failure which precludes the private sector from providing ebooks for free; it is commercial reality and the fact that such practices would be unsustainable. In the physical realm this problem does not arise, because the deterioration of physical books and the cost and difficulty of reproducing and distributing them means the primary and secondary markets operate quite distinctly and no competitive threat is posed by the library service. Indeed the converse is true and the library service has historically been shown to be a highly important complementary service to that provided by publishers.

This is not to re-open the debate around e-lending which was dealt with so effectively in the previous review, but it is important to note that there is an important link between the definition of what can be validly defined as a core principle and the commercial environment and the manner in which that role is fulfilled.

Is the current delivery of the public library service the most comprehensive and efficient?

The terms "comprehensive and efficient" as set out in the 1964 Public Libraries Act have been the subject of extended debate in recent years, as those campaigning against library closures have insisted that local authorities are failing to fulfil their statutory duty to meet these criteria. We do not intend to rehearse that debate in this submission. However, we would note that wherever an existing library service is reduced or diminished in any way, it is almost axiomatic that the relevant local authority has a case to answer as to how it can be said to be continuing to provide a comprehensive service. Since the term itself implies full completeness, a diminution reduces that completeness. Some closures may be occasionally justified on cost grounds or because of low usage. But those arguments can only serve to balance against the reduction in the provision of a comprehensive service.

As for efficiency, publishers' engagement with the library service would lead us to believe that the service is efficient. It compares favourably with the infrastructure publishers encounter when dealing with retailers in the private sector.

There are those who claim efficiency might be enhanced were there to be a single national library service, with a single point of contact for publishers looking to sell books into the service, with library authorities purchasing from this one entity. We do not believe this arrangement would enhance efficiency. First, because there is already a high degree of centralisation in the commercial arrangements between publishers and libraries. A low number of library wholesaler and distributor companies act as intermediaries between publishers and libraries. So a move to one intermediary would not be such a dramatic change and could not be assumed to deliver radically great efficiencies. At the same time, due to competition law and commercial necessity, publishers would have to continue to deal with the service on a company by company basis. There could be no question of publishers combining to determine prices, quantities and terms. Hence efficiency gains cannot be anticipated from this quarter.

Furthermore, it is questionable whether library services would enhance efficiency through the purchasing from a single list. For one thing, they would have less choice (one provider instead of a several would, in general terms, tend to reduce choice and efficiency in the market). There is no clear reason to believe prices would be materially affected.

We believe that the efficiency of the public library service as a whole could be enhanced through the development of national level standards and skills. As with any nationwide service being delivered by very different providers, there is bound to be a wide variety in the level and nature of service provided. There may be a case for establishing a more clear and defined framework as to what a library user can and should expect from their library service, wherever in the country they happen to be.

What is the role of community libraries in the delivery of a library offer?

Again, the issues raised by the development of non-statutory libraries operating alongside or even in place of mainstream local authority public libraries has been subject debate recently. The PA does not have a strong view on this issue other than to note that all library services whether community or otherwise, must ensure that authors are duly rewarded for the enjoyment of their work. Non-statutory libraries may try to evade or claim not to be liable for the payment of the Public Lending Right, through which authors are remunerated for their loan of their works. For this reason we strongly agree with the Society of Authors when it states that all volunteer libraries should be included in the PLR scheme to ensure that loans are properly recorded and authors are paid for them. DCMS takes the view that some volunteer libraries should be exempt from the PLR scheme. However, again in line with the SOA, we believe that such an exemption places the UK in

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breach of its obligations under the Rental and Lending Directive (2006/115/EC). The Government may argue that since the PLR fund is a fixed amount it is irrelevant to authors' incomes if PLR is not paid from volunteer libraries. However, this is short-termist argument. In the longer term, if loans from statutory libraries decrease as volunteer library loans rise, it will give rise to pressure to drop the PLR fund accordingly. Neither local authorities nor authors will have any way of knowing how many loans are being made by volunteer or community libraries.

We would be delighted to provide any further information to the Review as required.

A handwritten signature in black ink, appearing to read 'R Mollet', with a horizontal line underneath.

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