



OPENING UP EDUCATION

SUBMISSION FROM THE BOOKSELLERS
ASSOCIATION TO DG EDUCATION & CULTURE

From:

THE BOOKSELLERS ASSOCIATION OF THE UNITED KINGDOM & IRELAND
6 Bell Yard
London WC2A 2JR

Tel: 020 7421 4640; Fax: 020 7421 4641; e-mail: tim.godfray@booksellers.org.uk
www.booksellers.org.uk

1 INTRODUCTION

1.1 The Booksellers Association of the United Kingdom & Ireland welcomes the opportunity to give its views on DG Education & Culture's Consultation to determine whether the European Commission should intervene at European level to bring about a more systematic use of Information & Communication Technology ["ICT"] in education.

1.2 We believe it is too early to make such a decision and that more research and small scale experiments are needed before such a judgement can be made.

1.3 This submission from the Booksellers Association makes several points to elaborate on our reasoning but, at its heart, these points are motivated by two principles.

- The first is that it is of paramount importance that '*the literary creative value chain*' in this specialist market continues to be well funded. Without adequate reward, authors and publishers could not create and bring to the educational, academic, scientific, scholarly and professional markets the selection of titles that teachers and learners in educational establishments benefit from at present. The primary way in which this value chain is funded is via the sale of books, whether in printed form or digital format. Opening Up Education without safeguards to those that make a living in creating content, and developing and distributing intellectual property, risks undermining the sale of books, and therefore risks reducing the funding to this creative sector of the economy (or imposing a greater burden on the state to fund the creative sector).
- The second is that we believe educational establishments, and indeed all publicly funded institutions, should avoid distorting competitive markets. Whether an individual book shop survives or thrives, or whether one e-book format or another does well, is ultimately a decision for the readers. Without safeguards, offering free Open Educational Resources¹ ["OER"] to educational establishments on a substantial scale risks distorting these choices, and therefore distorting competitive markets. Bookshops and bookselling websites play a crucial role in helping consumers discover new titles; were these to be harmed by the Commission's proposals to Open Up Education, then this would directly harm consumers.

1.4 The first of these points is critically important as the creation of the capability to distribute books (and other published materials) in digital formats has changed the underlying relative economics of selling (i.e. readers buying books). If the rules on increasing OER are not attuned to this new paradigm, there is a possibility that the sustainability of the production process (i.e. authors and those who transform their output into what readers want to consume) is undermined. This could result in serious consumer harm, albeit almost certainly an unintended consequence.

2 THE BOOKSELLERS ASSOCIATION

2.1 The Booksellers Association [the "BA"] is a trade association, based in London WC2, currently with 3,618 bookselling outlets in the United Kingdom & Ireland in membership, of which 1,056 relate to independent bookshops².

BA membership

2.2 Our members cover a diverse range of different bookselling businesses - large High Street chains with mixed businesses (e.g. W H Smith); large specialist bookselling chains (e.g. Waterstones); independents (e.g. Daunts); library suppliers (e.g. Askews); school suppliers (e.g. Heath Educational Book Supplies); specialist internet booksellers (e.g. Eddington Hook); supermarkets (e.g. Tesco); and national wholesalers (Bertrams, Gardners and Easons).

¹ UNESCO definition: "*teaching, learning or research materials that are in the public domain or released with an intellectual property licence that allows for free use, adaption and distribution*".

² 1 – 5 outlets.

2.3 BA members sell to all markets (consumer – fiction/ non-fiction/ reference/ children’s; academic – academic/ professional/ school/ English Language Teaching) from terrestrial shops and over the internet in a variety of different formats (hardback, paperback, audiobook and e-book).

Involvement in new technology

2.4 e-books now account for over 11%³ of all book sales. The growth has been impressive. Booksellers want to be very much involved in the new technology. This autumn, book retailers in BA membership will be heavily involved in promoting e-book readers and e-books:

- Waterstones and Tesco are selling Amazon’s Kindle
- WHS and independent booksellers are selling Kobo e-readers
- Blackwells, Foyles, Sainsbury and Tesco are selling The Nook
- Easons are selling their own branded e-reading device
- Independents are also selling Gardners’ GoTab.

Involvement with schools

2.5 Many of our members have a strong business relationship with their schools. 876⁴ of all BA members have advised us that they currently supply educational establishments with printed books and e-books. That is an impressive figure.

2.6 As far as helping educational establishments is concerned, booksellers see their role as:

- Obtaining books for study and recreational use
- Giving advice about books – which might be the best for the course in question
- Supplying recommended reading lists
- Offering Inspection Copies
- Supplying teaching aids and support notes to teachers
- Running school book fairs⁵
- Talking to children about books and reading in the schools
- Running events in schools (e.g. organising a talk by an author)
- Inviting the children to come to the bookshop or the showroom to see the range of books available
- Liaising with the librarian.

2.7 Our members who liaise with schools are passionate about promoting the love of reading to children. In many cases with all these activities mentioned above, there is no immediate return on investment for the bookseller, but the latter is very much aware that the young person of today has the potential to become the reader of tomorrow.

3 OPEN STANDARDS

3.1 The Booksellers Association is sympathetic to the concept of Open Standards. It is against businesses in the book world using proprietary software to protect digital content.

3.2 We support full Interoperability, so that any digital content can be read on any device. At the moment, that does not happen. Amazon, for example, can sell e-books to other booksellers; but the latter are not easily able to sell e-books to Amazon’s Kindle customers. That seems to us unfair.

3.3 Commissioner Kroes thinks so too. “*We need effective interoperability between IT products and services to build a truly digital society. The internet is the best example of the*

³ Source: The Publishers Association.

⁴ As at October 2012. Source: The Booksellers Association.

⁵ Exhibitions in schools.

power of technical interoperability. Its open architecture gave interoperable devices and applications to billions around the world. But to reap the full benefits of ICT deployment interoperability between devices, applications, data repositories, services and networks must be further enhanced⁶.”

3.4 OERs need to be interoperable, searchable and available.

4 THE POTENTIAL FOR OPEN EDUCATIONAL RESOURCES TO DESTROY THE PRODUCTION OF CONTENT

4.1 It is understandable that the world of education would wish to look at Open Educational Resources as a preferred option over Paid-for Educational Content.

4.2 The benefits of OER are undeniable. They include:

- Improved access 24/7
- Can be adopted by all levels of education:
 - Pre-school
 - School
 - Higher education
 - Initial Vocational Training
 - Adult education
- Can cover both formal and informal education.

5 BOOKSELLERS THROUGH TO AUTHORS COULD BE SERIOUSLY HARMED

5.1 But there is a danger in moving away from too far Paid-for Educational Content. As we have said, those who create, develop and distribute content as a living need to be rewarded. OERs should complement commercially produced learning resources, but they shouldn't replace. It should be left to commercial publishers to fund the development of educational materials, and not for public money from the taxpayer to be used.

5.2 If the recompense is inadequate because there is too little Paid-for Content and too much free material disseminated under OER, then few commercial interests in the book world will invest in future content creation.

5.3 If that happens, fewer titles will be published so there will be reduced choice for consumers. Authors will not write; and publishers and booksellers will go out of business. If that happens, consumers and communities will suffer as they will have less access to books.

5.4 According to the TFEU: “*All European policy, including competition policies, must take into account culture aspects⁷”*. The closure of bookshops will go against this key principle. Jobs and growth in book retailing will be adversely affected.

5.5 In the consultation document there is a suggestion that after a certain time elapse has taken place from the date of publication, that the educational institution be provided with a free copy of the digital content. In such a situation, we believe there would be a violation of the author's copyright - unless the rightsholder gave prior permission for this to be done. Authors have the potential to be seriously harmed by what is proposed, unless they are adequately rewarded for their work.

5.6 Such an arrangement would also tend to generate a divisive environment, whereby a number of students would have the more up-to-date paid for material; and the rest, the less up- to-date free material.

6 DANGER OF MOVING AWAY TOO MUCH FROM THE PRINTED BOOK

6.1 We are in no way against schools using digital content. Indeed, many of our members are involved in the selling of digital content to educational institutions. But we do

⁶ *A Digital Agenda for Europe (COM(2010) 245).*

⁷ Article 167.

believe that the printed book should be used as well and should play a key part in the dissemination of education.

6.2 Appendix A sets out a newspaper article explaining what has been happening with technology in schools in the Republic of Ireland. Apple have held information evenings for teachers all over the country where they are promoting the power of the iPad in bringing schoolbooks to life. A number of schools in Ireland have apparently decided to throw textbooks out of the classroom and to give children iPads instead. This year 50 post-primary Irish schools are expected to adopt the iPad in First Year classes.

6.3 Obviously such a development will affect Irish schoolbook suppliers directly more or less immediately, but at the core of this issue is a question: - *If, as Apple intend, a child doesn't use a physical book from the age of 12-18, are they likely ever to use a physical book as an adult?* Apple are seemingly attempting to convert an entire generation of children away from physical books.

6.4 This could be a major threat to all booksellers. But we think there are some far wider considerations which deserve the attention of DG Education. There could be real damage to the children themselves and those in education. As the *Appendix A* implies:

- Won't there be a threat to creative thinking if children just use iPads?
- In some countries (e.g. Ireland) the parents have to pay for their school books. Won't there be many parents, students and institutions unable to afford expensive hardware?
- What about health issues like eye strain – Computer Vision Syndrome?
- Won't it be possible, in some cases, for minors to use iPads to access pornography over the internet from schools' premises?
- Might some children break Copyright by forwarding electronically to others material covered by Copyright legislation?

6.5 Technology should be a means to an end – not a means to an end. We believe the dissemination of education should involve digital content and printed books. There is much to commend the latter. Printed books are robust, inexpensive and efficient.

7 CONCLUSION

7.1 We have not been convinced yet that the provision of sophisticated devices like iPads actually ends up with children achieving better academic results. The opportunities lauded by some may well be overstated. It should be noted also that the promotion of the iPad in schools in Ireland seems to be done by the device manufacturer rather than by the educationalists, so there is a commercial interest in securing increased adoption of the device by schools.

7.2 From a competition point of view, there is a danger that OER could be allowed to develop in such a way that it constitutes unfair competition to educational publishers and could seriously endanger the whole sector – including authors and booksellers.

7.3 In our view, it is too early to say whether there should be a more systematic use of ICT in education, or that public intervention at European level is required.

7.4 It would seem that before such a judgement is made, more research and small-scale experiments would be desirable.

Tim Godfray
Chief Executive

Booksellers Association of the UK & Ireland Ltd

6, Bell Yard
London WC2A 2JR

Tel: +44 [0] 20 7421 4640 www.booksellers.org.uk

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APPENDIX

Appendix A: iPads in Irish schools

Tablet devices in our schools: iPad or Eyesore?

Let's open the debate!

Health risks, access to adult material, loss of creative thinking skills and concentration abilities – how far are we aware of the impact of tablet devices on our children's learning?

With a number of secondary schools across the country already using tablet devices in the classroom instead of textbooks, and more schools set to introduce the measure this September, one parent and technology expert has challenged the Departments of Health and Education, and Boards of Management to recognize the potential risks to our children and the need for an open debate on the issue.

Mark Bundschu a father of five and owner of Click Computer Store in Donegal asks the question, *“Has anyone considered the effect on the eyes of children of this amount of computer use? They will be sitting in front of a computer screen for up to 6 hours during school, another 2-3 hours doing their homework and, many of them will then watch television, catch up on social media, or play a computer game”*.

A website has been set up as a forum to debate the issue and garner opinions via a survey. The website www.ipadoreyesore.com has been set up by parents in the hope of getting the Departments of Education and Health to sit up and give the issue the attention it deserves by carrying out a thorough assessment on the possible health risks, before any more schools go ahead and introduce the measure and school books are gone forever.

The National Eye Institute in America found that the prevalence of myopia (nearsightedness) has increased from 25 percent to 41.6 percent of the population over the past 30 years — an increase of more than 66 percent, which has been attributed to increasingly high computer use. By replacing textbooks in schools with tablet devices, and putting children in front of computers for 6 – 8 hours a day, are we creating an environment for our children where they will be exposed to the risk of myopia?

Martin O'Brien President of **Association of Optometrists** Ireland said 'From a health point of view, the tablet devices themselves are not the problem, they are ergonomically user-friendly. It's the lack of education in how to use them correctly that can lead to problems. Staring at the computer too closely, not taking regular breaks, sitting in poor lighting and sitting in a poor posture; it is these bad habits that cause health problems. We need to educate parents, teachers and children in how to avoid these habits.

As well as that they need to be able to recognize symptoms should they arise. Early detection of the symptoms of Computer Vision Syndrome and a visit to your optometrist can make all the difference in avoiding long-term damage and maintaining healthy eyesight' said Martin.

Some pediatric eye doctors do however believe that heavy computer use among children puts them at risk of early myopia.

Eye fatigue is the main cause of myopia, according to Dennis Lam, a pediatric eye doctor in Hong Kong. 'The shorter the distance between the eye and the focus, the more the burden increases on the eye' says Lam. This burden leads to eye fatigue, which in turn can cause myopia.

A computer screen is made up of individual pixels, which are backlit. The pixels are constantly changing and therefore the eyes have to continually re-focus on the screen, causing excessive eyestrain. So when eyes are focused for long periods of time in this position, the eyes are going to experience strain and fatigue.

Is it fair to put 12 year old children through this?

The availability of adult content to children on tablet devices is also a major issue. It is easy to get around parental controls and download adult content, be it violent or pornographic.

A recent report *“Towards a Better Internet for Children”*, commissioned by the EU Kids Online Network, shows that one in five children has seen dangerous content online.

With the use of tablet devices, are we now potentially introducing this content into the classroom? The teacher has no way of knowing what a child is viewing on their Tablet. Gone are the days of playing X's and O's – children now want to catch up on social media, play online games and access to the internet also makes it easy for them to view adult content.

Mark Bundschu has welcomed Deputy Charlie McConalogue's calls for greater cohesion between government departments, schools and parents in order to face the growing risks posed by technological advancements. But says someone in Government has to show leadership on the matter.

“Is the Department of Education asleep at the wheel while the health of 12 year old children is put at risk with tablet devices? Firstly, Myopia and Computer Vision Syndrome have been completely ignored; secondly, there's the potential for children to download adult content and games accessing them during class; thirdly there are major issues around sustained concentration, whereby children will intersperse their homework or classwork with regular visits to Facebook or e-mail.

“Finally, there's the loss of creative thinking skills where everything in an E-book is dumbed down by spoon-feeding animations and explanations throughout the text,” says Mark.

An advocate of technology and in fact a promoter of embracing new technologies, Mark Bundschu suggests an open debate so that parents can hear all sides to this story.

“What we have seen is an incremental introduction of tablet devices into schools without any real strategy or thought of the big picture. While I agree that computers for schools and white boards and iPADS add value to a child's education, I think there are serious issues that haven't been addressed.

There is definitely a need to open up the discussion and our minds to what can potentially bring positive changes in teaching,” says Mark.

Mark says a debate on this subject is “timely” given changes in budgets, staff resources and technology. I'm stunned that nobody is showing leadership in this area, despite the fact that there are much cheaper and safer solutions available.