To the Commissioners,

Thank you for the opportunity to provide information on the effects which changes to the parallel import restrictions could have on the state of the Australian book industry, and on the culture of Australian consumers generally.

Since 1982 I have been a fulltime writer, without any other source of income except for an occasional payment for a consultancy or workshop. In this time, I have published fiction and non-fiction for children, young adults, and adults.

In the past some of my work has been published in Britain, America, France, Germany and Korea, but none of my books are currently available in Britain or America.

Although my own royalties would not be directly harmed if the protection barrier were lifted, I oppose the proposed change just as strongly as do many of my colleagues, and my professional association, the Australian Society of Authors.

Having read your Issues Paper and a number of submissions made by other authors, I will try to address topics which have not already been widely canvassed. As well as covering a couple of general matters, I intend to focus on the creation and production of Australian picture books. Although this section of the book industry does not receive any specific attention in your Issues Paper, it is an area which has significant cultural benefits for all Australians, and it is also the area which is likely to be hit first and hardest by any economic threat.

1. GENERAL

1.1 Living as an Australian Author

I often wonder if people who are not authors or illustrators have any idea what it is like to spend one's life with no sense of how much — or how little — one will earn in any given year. Apart from the fairly consistent payments from the Lending Right Scheme, everything else is always in the lap of the gods. Not only is there no regular fortnightly income, holiday pay and sick pay, but there is no superannuation.

Of course, other artists such as painters and musicians suffer a similar situation, but the only non-artists who live such precarious lives are professional gamblers. This is true of authors world-wide. However, there is a particular problem faced by Australian authors.

When I was involved, during the 1990s, in the campaign for Educational Lending Right, I came to realise that we are in a particularly risky position because (a) we live in a country with a comparatively small population but (b) we share our language with two countries that have very large populations. Because of economies of scale, books can be produced much more cheaply in Britain and America.

This disproportionate risk which we face is partly offset by the parallel import restrictions. Without this protection, Australian authors are at disadvantage, not just in comparison with British and American authors, but in comparison with authors from countries such as France, Italy, Japan, Korea, Indonesia etc, which do not share a language with larger nations.

As to suggestions that Australian authors who lose income from book dumping could somehow make up the shortfall with arts grants and prizes, you might as well recommend that they buy lottery tickets. Statistically, there is probably a better chance of a win.
1.2 A Healthy Book Industry

The size of our population also means that a comparatively small number of writers, illustrators and publishing companies are involved in our book industry.

Although, as I have said, book dumping would not immediately threaten my own income, any reduction of the book industry would affect the climate in which I live and work. I support the argument noted in your Issues Paper, page 6, that "Assisting Australian publishers, rather than just authors, is important because having a healthy Australian publishing sector helps to foster the development of works by Australian authors".

On Page 8 you ask: "To what extent is it important for Australian authors to have access to an Australian publisher in order to develop and promote their works? To what extent is access to an Australian publisher more important for a debut author than one with a track record?"

This seems to assume that Australian authors can necessarily find an overseas publisher for any publishable book which they write. The implication is that we have a choice.

My work has been published by independent Australian publishers such as Allen & Unwin and Omnibus, and also by the Australian sections of international companies such as Penguin, Harper Collins, Hachette, Random House and Scholastic. In regard to a number of my books, it is simply the case that the subject matter is too Australian for them ever to have gained overseas publication.

For example my biography, The Life and Myth of Charmian Clift (Harper Collins, 2000) cannot be marketed as (say) a biography of Sylvia Plath might be marketed, because Clift does not have a profile in Britain and America.

A recent picture book, Going Bush (Allen & Unwin, 2007) explores the science and history (including Aboriginal history) of a piece of urban Sydney bushland. It includes art and writing by sixteen culturally diverse primary children, from Muslim, Catholic and state schools. Again, the content is too specifically Australian to interest an overseas publisher.

In answer, then, to your question: even some authors with 25-year track records utterly rely on Australian publishers — and particularly, on independent ones. Their survival is necessary for our survival.

1.3 The Effect of the Global Financial Crisis

Seen as a luxury by many Australians, books will one of the first items to suffer from reduced consumption. The income of book creators, and the viability of the book industry, are more precarious now than they were when your study began. It seems crazy to contemplate any move which threatens to reduce Australian jobs and Australian incomes.

2. CULTURAL BENEFITS

I appreciate the fact that you have to inquire into the 'the benefits and costs' of the current parallel importation rules on 'the community more generally' as well as people in 'the books sector'.

It is as a citizen and a reader, as well as a writer, that I oppose changes to the current import restrictions. I believe that in the long run (or perhaps even in the short run), abandoning the protective legislation could hurt the very people who are supposed to be the beneficiaries of this change — i.e. Australian readers.
On pages 9-10 of the Issues Paper you raise a number of questions as to the Cultural Benefits of books. Your questions include:

* "What is the precise nature of the cultural benefits arising from books? Do cultural benefits arise from the existence and output of authors per se, or from the creation and dissemination of particular types of stories and writings?"

* "How much greater (if at all) are the cultural benefits attaching to Australian works compared to foreign works? What is the source of these differences?"

* "How do cultural benefits generated by books differ from those from other forms of cultural creation or expression?"

Taking the last question first, the answer is simply that books (or at least a particular type of book) teach us how to read. While I could make a case for children's books in general, it is clearer to focus on the area of the picture book.

2.1 The cultural benefits of picture books

With the greatest respect to other art forms, I have to say that sixty years of happily listening to music has not taught me how to play any instrument or even how to sing in tune. Sixty years of looking at paintings (sometimes in galleries; sometimes in books) has not taught me how to wield a brush. However, from the moment when my mother began to read me a book of nursery rhymes illustrated in a Kate-Greenaway-esque style, I began to be a reader. By that I don't just mean a person who is functionally literate (a useful enough skill, in its own right), but a person who has to read in order to have any quality of life.

Most experts agree that the picture book (as opposed to the educational 'reader' text) is the form of literature which first and foremost turns children into lifelong readers. It is the picture book — with its combination of written and visual text, and its high production values — which introduces children to the beauty (as well the joy) of literature.

Although I started to become a reader through a decidedly English book, I hope to demonstrate below that Australian books empower Australian children in a particular way. Certainly, it was the reading of Australian books that showed me that I could become a writer.

I believe that if Australian picture book creators (authors, illustrators, editors, designers, publishers) are undermined, the reading habits of a generation will be impaired.

2.2 The costs and risks of Australian picture book production

It is ironic that perhaps the most culturally significant (in the cost-benefit terms of the Issues Paper) part of the Australian book industry is also the part that ignorant bystanders might point to as evidence that Australian books are too costly. I know that many Australian families are not in a position to pay the $30.00 (or even $35.00) purchase price which an Australian hardback picture book currently commands.

As to this price, it is simply the case that it is far more expensive to produce a 32-page picture book than it is to produce an adult novel. On top of the obvious costs of colour separation and colour printing onto glossy paper stock, you need to add the fact that the editing and design of a picture book is always a very time-consuming business. The fact that there might only be 500 words in a book does not mean that any 500 words out of the English language can be thrown anywhere on a page. I have worked on seven picture books, in collaboration with six illustrators and five publishing companies. Every job has taken a minimum of two
years from the time the illustrator started work.

Overall, with the exception of art books and certain boutique or coffee-table books — all of which can command a high price, because the price actually adds snob-value to the product — the picture book is the most expensive part of the publishing industry. As far as the publishing of Australian picture books is concerned, the iron logic of economies of scale naturally weighs most heavily on this area. With a first print run as low as 5000 copies (sometimes even 3000), the purchase price cannot currently be set lower than $30.00.

In the past, it was sometimes possible for Australian publishers to take roughs of a picture book to the annual International Children's Book Fair in Bologna, and find an overseas publisher (whether English-language, or 'foreign') to share the upfront costs of production. Over recent years, because of downturns in overseas markets, this has become much more difficult.

However, if Australian publishers struggle to produce picture books, at least they can sometimes offset some of the loss against profits made by other products. Many authors and illustrators don't have this safety net. Picture books are their only product.

As well, it should be realised that in many cases a picture book is a collaboration between an author and an illustrator. In these situations, the royalty is divided 50/50. Splitting a 10% hardback royalty or 7 ½ % paperback royalty is bad enough. If the protective barrier against importation is dropped, the author and illustrator of a cheaply imported book will be splitting a much-reduced amount.

Currently, there is so little economic incentive for illustrators to remain in the business that some have gone over to graphic design, and young artists seem to be choosing other career pathways. Even as an author with a track record of a number of award-winning picture book texts, I have to wait two to five years to get an established illustrator to work on a book. If illustrators face even more threat to their incomes, I might as well stop writing picture book texts.

Of course, I might have to do that anyway. As this section of the industry is the most expensive and risky, this is the area in which Australian publishers will first trim their costs, if their overall survival is threatened. Thanks to the general global recession, I am finding that Australian publishers are more nervous about producing a picture book than they were only six months ago. I am afraid that the threat of competition by cheap foreign editions of Australian books might be the final straw which breaks a number of backs.

Certainly, a $30.00 pricetag might put the Australian picture book beyond the reach of the individual consumer. However, the fact that the local industry is currently able to produce such books at all means that these books are available for purchase by school and municipal libraries, and so can still be accessed by Australian children.

2.3 The cultural benefits of reading picture books which depict Australia

If picture books are important to the making of readers, is it necessary for Australian children to read Australian picture books? After all, there are great American and British picture books by authors and illustrators such as Maurice Sendak and Helen Oxenbury, not to mention the classics produced by geniuses such as Beatrix Potter or Edward Ardizzone. Surely our children live in a global society, and should simply get the best books — irrespective of the nationality of the book creator. Indeed, don't books open windows into different worlds, and isn't this part of a child's education?
Yes, and yes, and no. Of course children need to be able to read (whether at home or in their school or municipal library) the best international books, but this is no substitute for books which depict their own landscape and their own society.

I grew up in Australia in the early 1950s, at a time when there were very few picture books of any kind (partly the effect of war-time cost-cutting), and almost no Australian picture books. Although my mother went out of her way to buy books for me, for the first five years of my life I had — in addition to my nursery rhyme book — only three picture books. All were English. (At that time, American books were not permitted to be imported here.) As a result, my imaginary landscape was one of robins and snow, rabbits who wore clothing, gossamer-winged fairies, thatched cottages, steam trains and emerald green meadows. Because this was the world of books, I naturally believed that stories only happened in England. Already I knew that I wanted to be a writer when I grew up, but I assumed that to do this I would need to live in England.

For my sixth birthday I received *Snugglepot and Cuddlepie* and Eve Pownall's *The Australia Book*. This was a revelation. Although the Bad Banksia Men scared me witless, I loved the fact that I could find these creatures in the bush. However it was the yellow and brown colours of the Australian landscape in Margaret Senior's illustrations to Eve Pownall's book which spoke to me of my own world. It was this that made me realise that history, as well as story, could actually happen in Australia.

These days, of course, Australian picture books represent many aspects of our contemporary life — urban and rural, culturally diverse. Mercifully, it is now difficult for an Australian-born five-year-old never to have seen her own world in a book. However, we should not take this liberty for granted.

Finally, in regard to children's exposure to the best picture books, I might also add that in recent decades Australian picture books have rightly established a worldwide reputation. In 2003 I went to the International Children's Book Fair at Bologna, in the company of an illustrator/designer. Obviously I was not able to read the picture book texts from the non-English-speaking nations. However, in terms of artwork, design and production quality, the books on display in the Australian section were generally more innovative and of higher quality than books from any other country, with the possible exception of Poland. In comparison, many of the American and English books looked old-fashioned. While some Australian illustrators — such as Shaun Tan, Robert Ingpen, Gregory Rogers and Armin Greder — have won major international awards, even the books by less recognised Australian creators generally reach a high standard.

2.4 The cultural benefits of reading books in the Australian language

I am puzzled by the fact that, in weighing up cultural issues, you raise questions as to the importance (or otherwise) of 'particular types of stories', but you don't overtly raise the matter of language. If it is important for Australian children to find themselves and their world in the visual text of a picture book, it is just as important for them to have books which are written in their own dialect of English. This dialect is a matter both of vocabulary and speech rhythms.

If the protection barrier is dropped, and cheap American versions of Australian children's books are brought into this country, there is no guarantee that they will be the same as the Australian original editions with which they will be competing.

In 1989, the American rights to my picture book *My Place* were purchased, and an American translation got under way. Initially, I was puzzled by the proposed changes to nouns. For example, 'pumpkins' were turned into 'squash', supposedly because children in the land of
pumpkin pie don't eat pumpkins. Similarly, 'tar' was questioned, because children familiar with the Tar Baby use a different word for the black surface of a road. This was hard enough to accept, but my real problem came with the prepositions. I soon realised that 'in', 'on' and 'up' can all mean something different in American; whereas for me, 'in back of' sounds like a clumsy substitute for 'behind'. By the time the translation was completed, there were passages of the book which I could not read out loud, because I kept stumbling over the rhythms.

Other problems can occur in regard to content. In regard to a babies' counting book of mine which was brought out by an American publisher, a comic reference to a character keeping rats in her shoe was changed to 'mice', because (I was told), 'We don't have rats in America.'

Every Australian children's author with whom I have ever discussed this situation has come out with her own stories of ludicrous and sometimes intrusive changes (whether of grammar or content) made to suit the American market.

Does this matter? After all, in a world which increasingly uses American English for mass communication (television; internet; text messages) surely the effect of a few picture books is neither here nor nor there. The amount of time the average Australian child spends watching *Sesame Street or The Simpsons* is going to be greater than the time she spends reading any one book.

This may be true. However, this is something which can't be measured by minutes and hours. The effect of reading words on a page — at a time when a child is just learning to read — is different from hearing them spoken on TV. 'Mom' in print is very different from 'Mum', but the rhythms of the two languages are far more different, and are very hard to quantify. While we can't protect our children from being exposed to American English via electronic media, at least by retaining the parallel import restrictions we can cheaply ensure that when Australian kids get Australian books, the text is written in Australian.

**CONCLUSIONS**

Picture book creators (authors, illustrators and publishers) will be at the sharp end of any downturn in the Australian publishing industry, whatever the cause.

While some authors and illustrators whose work is currently in print in America and Britain would suffer immediate income loss if cheap editions of their books were available here, all Australian picture book authors and illustrators would suffer if publishers — struggling in a market undermined by cheap imports — decided to reduce the picture book component of their lists.

The reduction of the small and fragile, but culturally significant, Australian picture book industry would also be a loss for all Australians. At a time when literacy is on the lips of every politician, it makes no sense to do anything which might prevent young Australians from feeling at home in a book.

Yours faithfully,

Nadia Wheatley