



9-11 Napier Close  
Deakin ACT 2600  
Australia

info@nsla.org.au  
www.nsla.org.au

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Thursday, 2 October 2025

Dear Committee Secretary,

**RE: *Revive*, Australia's National Cultural Policy**

National and State Libraries Australasia (NSLA) Inc. welcomes the opportunity to contribute to the Environment and Communications References Committee inquiry into the National Cultural Policy (*Revive*) released on 30 January 2023, and other related matters.

NSLA's Australian members—our national, state and territory libraries—are the trusted custodians of Australia's documentary heritage. Our total collections, with a combined asset value exceeding \$3.45bn, comprise books, artworks, historical manuscripts, photographs, cultural objects and 7.5 petabytes of digital records, almost all of which is Australian content and together forms the documentary heritage and memory of our nation. Our libraries collectively welcomed 7.2 million visitors in 2024-25 which, together with 58.1 million visits to our websites and digital catalogues, makes our libraries among the most accessible and accessed parts of Australia's cultural infrastructure.<sup>1</sup>

Our libraries—indeed, all libraries—are essential infrastructure that exist at the heart of Australia's cultural, knowledge and information ecosystems. As the custodians of Australia's documentary heritage, we preserve that heritage for current and future generations; libraries are also enablers of cultural expression and learning through public programs, digital platforms, and outreach. At the core of library values is a commitment to free and equitable access for all, which aligns strongly with the National Cultural Policy's guiding value that "all Australians, regardless of language, geography, age or education, have the opportunity to access and participate in arts and culture."<sup>2</sup>

In considering a review of the National Cultural Policy, **we recommend that the policy be strengthened by (i) further acknowledgement of the contribution of libraries to the national cultural infrastructure** as institutions of cultural collection, discovery, access, creativity and engagement, and **(ii) recognition of the contribution of libraries to critical democratic infrastructure**, as the custodians in Australia of the collective memory—both critical and inspired—of our national story. The National Cultural Policy notes that "a healthy democracy must strive to make culture available to us all,"<sup>3</sup> and libraries are fundamentally sites of access to information and knowledge for all. These are fundamental rights and essential drivers of social, educational, cultural, democratic, and economic wellbeing.<sup>4</sup>

Guided by the Policy's five pillars, we make the following recommendations overleaf.

---

<sup>1</sup> NSLA Annual Statistics, 2024-25.

<sup>2</sup> *Revive*, p. 19.

<sup>3</sup> *Revive*, p. 12.

<sup>4</sup> See the International Federation of Library Associations (IFLA) 'Statement on Defending Inclusive Knowledge Societies,' 9 July 2025, <https://www.ifla.org/wp-content/uploads/IFLA-statement-on-defending-inclusive-knowledge-societies.pdf>.

## First Nations First

The Policy’s ambition of “recognising and respecting the crucial place of First Nations stories at the centre of Australia’s arts and culture”<sup>5</sup> should recognise both historic harm and injustice, and the ongoing hurt of our nation’s cultural infrastructure and collections including materials created by and about First Nations people that have, in many cases, been acquired and made available without the explicit consent of the creators and/or the people and cultural knowledge represented. Much of Australia’s library sector has undertaken work to ensure best practice cultural protocols, in particular implementation of Indigenous Cultural Intellectual Property (ICIP) protocols, to ensure that First Nations’ cultural IP is respected while simultaneously providing opportunities for sharing and engagement. We recommend:

- **Further development and promotion of best-practice cultural protocols** throughout Australia’s creative sector, and
- **Clear legislative frameworks recognising Indigenous Cultural Intellectual Property (ICIP)** and mechanisms to safeguard the integrity of collections that it protects.

## A Place for Every Story

We welcome the Policy’s recognition of the contribution of libraries to Australia’s cultural infrastructure, and the ambition that these be “restored, built and maintained.”<sup>6</sup> Our national, state and territory libraries are the custodians of our national stories in published and unpublished works (e.g., diaries and letters) and we face an increasingly digital environment with greater complexity and new systems required to manage content. As Australia’s legal deposit institutions, we collect and preserve copies of *all* material published in Australia, without social, artistic, political or moral judgement. This ensures a collection that is representative of Australia’s diversity and in which all Australians can see themselves reflected.

Yet it is a fact that cost pressures and competing priorities have seen a decline in real terms of funding for libraries. This is also true of Australia’s network of 1,413 public library branches that are critical cultural venues in regional and rural communities.<sup>7</sup> We note that, adjusting for inflation, there has been a 12% funding decrease for public libraries nationally in real terms over five years.<sup>8</sup> We recommend:

- **Federal Government funding streams be made available** alongside existing local and state government funding for libraries, in recognition of libraries as cultural venues (including in regional communities); and
- **Expansion of the Arts and Disability Associated Plan** to ensure that the role of libraries to deliver equity of access—to all Australians, wherever they are, in the format required for access—is maintained.

## Centrality of the Artist

Libraries centre both users and artists. Australia’s national, state and territory libraries provide Fellowships and other opportunities that centre artists and support intellectual and artistic creativity by connecting researchers, writers and other artists to cultural resources held in our institutions.

The library and information sector has deep expertise in balancing the centrality of the artist with the public interest of accessing, using and reusing content. Our libraries employ rights management specialists that navigate the complex intersection between maximising public benefit and respecting the rights, including economic rights, of Australia’s creatives. Australia’s national, state and territory libraries are leaders in digital innovation and have leveraged new technologies to explore innovative and sustainable opportunities to engage with collections: examples include State Library of Queensland’s ‘Virtual Veteran’ project (2024), which trained an LLM chatbot on diaries, letters, newspapers and historical sources that speak to the Australian experience of the First World War, and the National Library of Australia’s current project utilising Voice-to-Text AI to transcribe its entire collection of 58,000 hours of oral history recordings.

---

<sup>5</sup> *Revive*, p. 18.

<sup>6</sup> *Revive*, p. 19.

<sup>7</sup> Australian Library and Information Association and National and State Libraries Australasia, *Australian Public Libraries Statistical Report 2023-24* (forthcoming), 24.

<sup>8</sup> *Australian Public Libraries Statistical Report 2023-24*, p. 21.

Our innovations have respected creators' rights and have used only collection material that was clearly in the public domain, or where s200AB of the *Copyright Act (1968)* Cth applied, or where access rights were negotiated with rights owners. We celebrate the ambition of the Policy that "creative talent is nurtured through fair remuneration."<sup>9</sup> There is a diversity of models for remuneration for use of works in AI LLMs, with court decisions around the globe creating different models for exploration. Developing national guidance (whether through legislation or best practice models) should be a priority for Government. We refer to our submission in response to the Productivity Commission's interim report *Harnessing data and digital technology*,<sup>10</sup> and recommend:

- **Exploration of models like the Public Lending Rights scheme to ensure economic compensation for creators** alongside the development of Australian LLMs and generative AI solutions.

### Strong Cultural Infrastructure

We welcome the Policy's recognition of the importance of collaboration across government, and coordination between the Commonwealth, states and territories, and local governments. National and State Libraries Australasia (NSLA) Inc. is an example of successful shared work across governments, and has achieved a legacy of important work that has strengthened the library sector through collaboration for more than fifty years. One example is Australia's National eDeposit (NED) service, an innovative and collaborative service built by NSLA and hosted by the National Library of Australia that responds to the major challenge of capturing and preserving the digital documentary history of our nation, for the benefit of all Australians. The NED service provides for the deposit, management, storage, preservation, discovery and delivery of published electronic material across Australia and, as of March 2025, includes more than 114,000 items in its collection.

We commend NSLA to the Committee as an example of an existing collaboration across levels of government, and invite the Committee's **consideration of NSLA Inc. as a coordinated network capable of supporting the delivery of the Policy**. Opportunities include, but are not limited to:

- **The contribution of libraries to the proposed National Media Literacy Strategy**,<sup>11</sup>
- Coordinated **programs on democracy and civic engagement**;
- **Support for library programs and initiatives combatting mis- and dis-information**, designed to increase the capacity of Australians to make informed decisions and know how to respond to misinformation and disinformation trends; and
- Consideration of libraries in progressing the recommendations and outcomes of the recent study by Australia Reads and BehaviourWorks Australia, *Understanding Australian Readers: Behavioural insights into recreational reading*.<sup>12</sup>

We further recommend reform of Australia's copyright framework as key infrastructure on which the access, use and reuse of Australia's national collections rests. We commend the Policy's recognition that "arts and culture are generative (creating new works and supporting emerging artists)."<sup>13</sup> Our libraries have been champions of the public domain, and we advocate for modest reforms to Australia's copyright regime that would better achieve the balance between the interests of access, use and innovation with the centrality of the artist and recognition of creators' rights, discussed above.

Together with the Australian Libraries and Archives Copyright Coalition (ALACC, of which NSLA is a member), we again emphasise that strong cultural infrastructure must include **legislative frameworks recognising Indigenous Cultural Intellectual Property (ICIP)**, and further recommend that the Government progress:

- **A stand-alone fair dealing exception for quotation in the *Copyright Act (1968)* Cth**, that applies broadly to any copyrighted material, any user acting in good faith (including fairness factors and respect for ICIP and moral rights) and any purpose; and

<sup>9</sup> Revive, p. 19.

<sup>10</sup> See <https://www.pc.gov.au/inquiries/current/data-digital#report>.

<sup>11</sup> See <https://ministers.pmc.gov.au/mccarthy/2024/charting-course-diverse-and-sustainable-news-sector>.

<sup>12</sup> See <https://australiareads.org.au/news/behaviourworks-report-released/>.

<sup>13</sup> Revive, p. 19.

- **A limitation on remedies for the use of orphan works material** (i.e., material for which the copyright owner of material cannot be identified, located or contacted) where a diligent search to identify the owner of the material has been conducted, and where use of the material respects ICIP.

We note the Committee's particular reference to potential tax reform and draw attention to the Cultural Gifts Program, and endorse the Policy's proposal to streamline programs that incentivise philanthropic support for collecting institutions, including libraries.<sup>14</sup>

### Engaging the Audience

Australia's national, state and territory libraries are among the most accessible and accessed parts of Australia's cultural infrastructure. The reach of our libraries' cultural collections, exhibitions and public programs is vast: our libraries collectively engaged with 7.2 million on-site visitors to our reading rooms, exhibitions, and public programs in 2024-25. In the same period, an additional 58.1 million visitors accessed our websites and open digital catalogues, and more engaged with our collections on social media and other platforms.

We emphasise the importance of public investment in infrastructure that ensures that digital access to collections (including collections in digital form) can be sustained. We draw the Committee's attention to stresses that are being placed on our digital infrastructure by crawlers and bots,<sup>15</sup> that will likely be exacerbated by text and data mining being deployed on our collections and online repositories at a scale for which our infrastructure and servers are unprepared and under-resourced, and which may jeopardise our ability to deliver our mandated services to the Australian people. We recommend:

- A strengthened acknowledgement of the role of **libraries as digital environments in which Australians, anywhere, can engage** with national stories; and
- **Increased resourcing** relative to the scale of our digital infrastructure.

Furthermore, in 2023-24 Australia's public libraries delivered a record 409,000 programs that engaged over 7 million attendees.<sup>16</sup> We commend the strength of our sector's network to deliver programs at scale that will strengthen civic engagement and, through our collections and cultural institutions, our democracy. We recommend:

- A strengthened acknowledgement of the **role of libraries to build and support community literacy and engagement**, including provision of contemporary collections and safe spaces for learning;
- Recognition that libraries support children and families with cultural events and activities; and
- Recognition that libraries facilitate engaging language programs and preserve and promote culturally- and linguistically-diverse content to multicultural communities.

### Summary

In summary, we commend to the Committee the contribution of Australia's national, state and territory libraries, as well as the broader library infrastructure across the nation, as critical components of the national cultural infrastructure, and as infrastructure that supports and reflects our strong, functioning democracy. We congratulate the Government on the success of the first iteration of the National Cultural Policy, and we encourage the Committee to consider:

- (1) Increased recognition and funding for **libraries as critical cultural and democratic infrastructure**;
- (2) Consideration of **Australia's national, state and territory libraries as a coordinated, national network** capable of delivering cross-jurisdictional infrastructure and programs at scale;
- (3) Strengthened cultural infrastructure in the form of modest **copyright reform and a clear legislative framework to recognise Indigenous Cultural Intellectual Property (ICIP)**;
- (4) Further **exploration of operational models for AI large language models that balance creators' rights with public access** and benefit;

<sup>14</sup> Revive, p. 74.

<sup>15</sup> For a recent sector conversation of this problem, see <https://wiki.lyrasis.org/display/cmygp/Aggressive+AI+Harvesting+of+Digital+Resources>.

<sup>16</sup> *Australian Public Libraries Statistical Report 2023-24*, p. 6.

- (5) **Strengthened resources and infrastructure to deliver enhanced digital services** and access to information for all Australians, wherever they are, in whatever format is required.

We believe these recommendations will build on the vital work that commenced with the first iteration of the National Cultural policy, and will further strengthen the creative sector in Australia and with it, our democracy.

**For more information, contact**

Dr Simon Polson  
Executive Director, National and State Libraries Australasia (NSLA) Inc.