

# Cost Recovery Implementation Statement for Classification Services

Submission from Books Create Australia, comprising the Australian Library and Information Association (ALIA), the Australian Publishers Association (APA), the Australian Society of Authors (ASA) and BookPeople (formerly the Australian Booksellers Association).

July 2025



Australian Library and  
Information Association



AUSTRALIAN  
PUBLISHERS  
ASSOCIATION

AUSTRALIAN  
SOCIETY  
*of* AUTHORS

**BookPeople**

## Contents

|   |   |
|---|---|
| Executive Summary .....   | 3 |
| Recommendations:.....   | 4 |
| About Books Create Australia .....  | 4 |
| 1. Context and concerns .....   | 4 |
| Australia’s book industry .....   | 4 |
| Current political context .....   | 5 |
| Australian cultural policy setting .....  | 6 |
| Self-classification as possible alternative and next steps to explore options ..... | 6 |
| 2. Responses to specific questions .....  | 7 |

# Executive Summary

The Australian book industry—its authors, publishers, booksellers and libraries—collectively holds concerns that the proposed “significant increase” in publication classification fees will threaten the diversity and availability of literature for Australian readers. We urge the government to consider the wider policy context and pause any fee increases while working with the book industry towards an efficient, fit-for-purpose publications classification system.

## Australian context

- Australia's book industry - particularly independent and smaller publishers - operates on razor-thin margins.
- Most Australian authors earn below the poverty line.
- Australians are reading less, and literacy levels are in decline.<sup>1</sup>

## Australian government cultural policy objectives

- *Revive: Australia's National Cultural Policy* commits the Government to telling a diversity of Australian stories and fostering a vibrant national cultural sector.
- One pillar of the policy is a commitment that “Australian stories are seen and heard, regardless of platform.”<sup>2</sup>

## International context:

- Globally, there has been a rise in book challenges and censorship attempts.
- Publishers are increasingly cautious about titles that might attract controversy, leading to self-censorship in some areas of content.
- The Australian trade market is already considered a marginal, or a secondary market, by several international publishers.

## Censorship and self-censorship concerns:

- There has been a sharp rise in book challenges in Australia, with LGBTQIA+ books disproportionately targeted.
- Publishers are already showing signs of self-censorship due to fear of backlash and classification costs.
- The chilling effect is likely to worsen if classification fees rise significantly.
- This threatens diversity in Australian literature and limits readers' access to important works.

## Industry proposal for self-classification

- Unlike other classifiable formats, there are currently no alternative classification options, such as self-classification, endorsed for publications.

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<sup>1</sup> Australian Bureau of Statistics. (2024, April 16). [How Australian generations spent their time on recreation and leisure](#)

<sup>2</sup> Commonwealth of Australia (2023). [Revive: A place for every story, a story for every place](#)

- There is scope for an industry-based scheme of age and content classification using TitlePage and the ONIX metadata system offering.

Any substantial fee increase may have adverse impacts on authors, publishers, booksellers and libraries, and most importantly on Australian readers. Instead, the book industry is keen to work collaboratively with the Government on a classification scheme that supports the diversity, viability, and accessibility of Australian book culture and reading.

## Recommendations:

1. The Department pause any proposed increase in classification fees for publications.
2. The Department, in partnership with industry, explores alternative approaches before implementing any fee increases, including the exploration of the introduction of a self-classification system for Australian book titles, leveraging existing infrastructure such as the TitlePage platform and ONIX metadata standards.

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## About Books Create Australia

Books Create Australia (BCA) is the representative coalition of the key industry organisations: the BookPeople (Australian Booksellers Association); Australian Library and Information Association (ALIA); Australian Publishers Association (APA) and the Australian Society of Authors (ASA). This group of peak bodies also collaborates to manage Australia Reads, Australia's national reading advocacy organisation. BCA champions reading, books, library use, bookshops, Australian stories and research, authors, and literary culture. Our component associations represent more than 200 publishers, 500 bookstores, more than 1,700 public library service points and over 4,000 authors. Overall, more than 30,000 people work in the book industry as writers, editors, publishers, booksellers, and library staff.

## 1. Context and concerns

### Australia's book industry

Australia's book industry is vital to our national story, literacy and cultural life.

- 25,000+ new Australian titles are published each year.
- 1.55 million books, ebooks and journals available for sale.
- 160+ million loans are made from public libraries annually.

Despite the importance of Australia's book industry to Australians, the financial viability of Australian owned publishers—and the Australian-authored books of multinational publishers—is generally marginal, with a number of publishers operating at a loss or only with subsidy over the longer term.

The sheer number of titles is a component element of publishing and literature as a cultural practice. Book publishing offers breadth/diversity and depth in its range of options and coverage of its constituent areas. Some research indicates that since 1900 there have been about 1 million feature films released globally, but possibly 130 million books released in the

same period. However, publishing at such scale means most books make no money. Instead, publishers publish in portfolios (or annual lists of titles) with the hope that perhaps one or two titles in a list will be profitable. According to Nielsen BookScan, of the unique print titles sold in Australia between 2018-2020, 99% sold under 1,000 copies in a year.<sup>3</sup>

The marginal nature of Australian publishing is also reflected in the earnings of our creators, with Australian Authors on average earning only \$18,200 per annum from their creative practice.<sup>4</sup>

In this context, any increase in costs has the potential to make titles unviable.

## Current political context

We have seen sustained and coordinated challenges to book titles across multiple countries in the preceding few years. Figures from the American Library Association (ALA) report 1,247 book challenges in libraries against 4,240 titles in 2023, and 821 challenges against 2,452 titles in 2024.<sup>5</sup> While the numbers were lower in 2024, this is explained at least in part by an increase in legislation or policies explicitly restricting books from libraries in multiple states. The most challenged titles included those covering LGBTQIA+ themes, race, racism, equity and social justice.<sup>6</sup> Similar increases in book challenges have been seen in the UK,<sup>7</sup> Aotearoa/New Zealand,<sup>8</sup> Brazil,<sup>9</sup> Canada<sup>10</sup> and others.

In Australia, the Australian Library and Information Association (ALIA) has been tracking book challenges in Australian libraries since March 2023, following a sudden and sharp uptick in challenges to books and programs. In 2024 there were an average of 13 challenges per month, which grew from virtually no challenges preceding 2023. The books challenged in Australia have disproportionately dealt with LGBTQIA+ themes. Australian libraries have also reported a constant level of challenges to LGBTQIA+ programs, displays and events.

In this environment, Australia's authors, publishers, booksellers and librarians are concerned that the Stakeholder Engagement Paper proposal for "fees for the classification of publications potentially increasing significantly" will be a disincentive to the diversity of new book titles, especially those dealing with topics such as LGBTQIA+ or racial themes.

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<sup>3</sup> A Nielsen Book examination of print book volume sales across Australia 2018 / 2019 / 2020 YTD. Nielsen Book. *ASA - Nielsen Book Volume Sales Band Study 2020*. Nielsen Book, October 2020.

<sup>4</sup> Australia Council for the Arts 2022, 2022 [National Survey of Australian Book Authors, Australia Council for the Arts](#)

<sup>5</sup> American Library Association (2025) [Book Ban Data](#)

<sup>6</sup> American Library Association (2025) [Frequently Challenged Books](#)

<sup>7</sup> Shaffi, Sarah (2025) [A third of UK Librarians asked to censor or remove books](#) The Guardian

<sup>8</sup> Library and Information Association of New Zealand Aotearoa: Te Rau Herenga o Aotearoa (2025) [Challenged Topics](#)

<sup>9</sup> Rogero, Tiago (2024) [Brazil's unparalleled spate of book bans is a page out of US culture wars](#) the Guardian

<sup>10</sup> The Centre for Free Expression (2025) [The Canadian Library challenges database](#)

*“I can choose to write strictly cis, strictly heterosexual texts. I can be the respectable gay guy who doesn’t write anything “inappropriate”.*

*That means when I spend three years on a book, it won’t be dismissed fewer than three words into the blurb, and it won’t run the risk of being “called-in” for classification or restricted to the senior section, if it’s shelved at all ...*

*But that also means I won’t be reflecting the world as it is. I won’t be writing for Will, the teenager who struggled with his sexuality. I’ll be writing for Will, the career author and mortgage payer. And honestly, if I can’t risk having some skin in the game, fifteen years into my career, and as the more palatable kind of queer (a cis gay man), what kind of ally am I to my queer peers, particularly the trans and nonbinary targets of the current culture wars? And what am I contributing to the literary identity of our country?”*

-Australian author, Will Kostakis<sup>11</sup>

## Australian cultural policy setting

An increase in classification costs would directly undermine the goals of *Revive: Australia’s National Cultural Policy* by placing additional financial pressure on publishers and authors already operating on slim margins. It would discourage the publication of riskier, diverse, or regionally rooted Australian stories and weaken the viability of small and independent publishers. In doing so, it cuts across the government’s commitment to fostering a vibrant national cultural sector and supporting the creation and circulation of Australian content.

## Self-classification as possible alternative and next steps to explore options

We encourage the Department to defer any changes to classification fees until alternative models can be thoroughly explored. A significant increase in costs would place additional pressure on already stretched parts of the book ecosystem - particularly independent publishers and authors—and risk limiting access for Australian readers.

The book industry—authors, publishers, booksellers, and libraries—is committed to working with Government on a solution that reflects the sector’s economics while supporting the goals of a diverse and accessible Australian literary culture.

As noted in prior consultations, a self-classification approach tailored to books could offer a more practical pathway. Leveraging existing tools—such as TitlePage and ONIX metadata—would allow for a streamlined, cost-efficient system. Such a model would recognise the distinct nature of book publishing while aligning with broader cultural policy objectives, including the support and visibility of Australian stories.

This approach would enable an efficient, low-cost, and fit-for-purpose solution that reflects the unique characteristics of the publishing sector.

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<sup>11</sup> Kostakis, W (2023) [Confessions of a Queer Author](#)

## 2. Responses to specific questions

### 1. Do you have any views on the current fee structure? For example, should different fees apply to different types or sizes of industry participants or different products that are being classified?

Broadly, Australian trade (consumer book) publishing is structured around two poles: locally owned independent publishers focused on small Australian lists, and multinational publishers who publish Australian titles alongside distributing international catalogues. In both cases, the publication of Australian content is often a low-profit or loss-making commitment.

A recent five-year survey of independent publishers highlights escalating pressure on the local sector. Combined profits fell from an average of \$588K per enterprise to \$477K, with declining sales, shrinking print runs, and rising costs. Title output dropped by 25%, with non-fiction and poetry hardest hit. Total units sold fell by 21%, while printing costs rose sharply, driven by reduced economies of scale and higher per-unit costs particularly in relation to printing. Author royalties declined by 20%, even as commission and salary expenses increased. Cost increases will likely further shrink the number of published Australian titles. With significant concerns about the decline in reading and literacy, any moves that increase the pricing of books or reduce the diversity of titles may have a detrimental impact on reading.

BCA notes that for smaller publishers even current classification fees may be prohibitive. When the biography *Gender Queer* was called in by the Australian Classification Board (ACB), it was the bookshop Kinokuniya that paid the classification fee.<sup>12</sup> It is quite likely that for similar titles interested third parties such as libraries or individuals may pay the classification fee to ensure that these materials are available to Australians, however these organisations would not be able to afford to do this if there was a sharp increase in fees. The result may be that books that are of high literary value but that deal with sensitive topics such as gender identity, are not available for Australians to read.

BCA further notes that unlike formats such as computer games, there are no options for self-classification of books, making the use of the formal classification from the ACB the only option. Options such as self-classification should be explored before any unaffordable fee increases are made.

### 2. In what way might potential revised or newly introduced fees impact on your business or choice of classification method?

Because books are not routinely classified (only submittable publications are required to be classified) classification costs are not routinely factored into costings.

Given the current political environment and the targeting of LGBTQIA+ content, there is a legitimate concern that the risk of paying an increased classification fee if someone is maliciously referring books to the ACB may deter publishers from taking on books with “controversial” themes, decreasing the diversity of Australian titles.

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<sup>12</sup> Kinokuniya (2023). [“Gender Queer” by Maia Kobabe](#)

**3. While understanding broader government policy concerning cost recovery, what factors should be taken into consideration for future cost recovery arrangements for classification services?**

BCA again draws the Department's attention to the realities of Australia's book industry where few Australian titles are profitable, with short print runs, pricing margins tight, and author incomes are well below the poverty line. Inflation and the cost of living crisis means these factors are worsening rather than improving.

As noted above there is also no self-classification option for books. In addition, there are a number of key issues in the book classification system that require attention, including the unclear status of audiobooks, the overlapping regulatory impact of the Online Safety Act for e-content and unclear and little publicised processes for books to be referred or submitted to the ACB for classification. These matters should be addressed before any significant pricing changes are made.

**4. What transitional arrangements would support industry adaption to a revised cost recovery model?**

The industry is not ready to absorb a substantial increase in fees. As noted above, moves to establish alternatives (such as self-classification) and close gaps/remove overlaps should be addressed before fee increases are considered.

**5. Is there any further feedback that you would like to submit in relation to classification fees or cost recovery arrangements as part of this Engagement process**

BCA would welcome conversations with the Department to discuss the proposal and the potential futures for the publication classifications system. As above, we would be very interested in exploring the possibilities of a **self-classification system for Australian book titles**, leveraging existing infrastructure such as the **TitlePage platform and ONIX metadata standards**. This approach would enable an efficient, low-cost, and fit-for-purpose solution that reflects the unique characteristics of the publishing sector.