Response to Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs public consultation run on behalf of the National Library of Ireland

Comments submitted by the National Library of Wales

May 2017

I write as Director of Collections and Public Programmes of The National Library of Wales, one of the six Legal Deposit Libraries under UK and Irish legislation, in support of the extension of the policy of collecting, preserving and making available the published output of the Irish nation to all contemporary publication formats, including online digital formats.

Established by Royal Charter in 1907, The National Library of Wales is a Welsh Government Sponsored Body and a Registered Charity. Our core object is to ‘collect, preserve and give access to all kinds and forms of recorded knowledge, especially relating to Wales and the Welsh and other Celtic peoples, for the benefit of the public, including those engaged in research and learning’. In addition to over 6.5 million printed volumes, our collections include archives and manuscripts, maps, photographs, artworks and screen and sound materials, and increasingly electronic publications and electronic archival materials.

Please find our response to the public consultation outlined below.

1. Should the policy of collecting, preserving and making available the published output of the nation for the benefit of the public be extended to include all contemporary publication formats of Irish interest including online digital formats e.g. websites?

As one of the UK Legal Deposit Libraries which has benefitted greatly from the implementation of legislation to extend legal deposit to non-print formats since 2013, we wholeheartedly support the proposed extension of the National Library of Ireland’s policy to include all contemporary publication formats. Publication formats have proliferated with the emergence and evolution of digital technologies, and we would regard this extension as key to preserving the Irish nation's recorded memory. The perceived value of such measures is evidenced by the fact that twenty of the twenty-eight EU member states have already taken similar steps towards collecting, preserving and making available published works in non-print publication formats, and this proposition to extend the policy in Ireland would be timely and in keeping with these developments.

2. What issues arise if a policy extension on digital legal deposit is not provided for?

Not providing for a policy extension on digital legal deposit would severely restrict efforts to collect, preserve and give access to non-print published works, including e-books, e-journals, official publications and websites for future generations.
An increasing number of publications appear in non-print formats. Many publishers use multiple formats that contain different levels or depth of information. For example, newspapers that continue to publish print editions select stories from a larger pool that is available on their online site. Much STM publishing is now online only and such publications may also be interactive, allowing the reader to manipulate data for themselves. Websites, which are regarded as online publications, have been found to be transient and can of course be subject to frequent change. Though sometimes trivial, they often contain information available nowhere else and as recent events have shown, as well as reflecting society, they are often influential in directing change in society for good or bad. These works may be lost altogether if not archived and preserved at the appropriate time, leading to the loss of contemporaneous evidence for future researchers.

As the balance between the number/proportion of published works would continue to shift towards non-print formats, it would result in a widening void in the Irish nation's recorded memory. This widening void would become increasingly apparent when viewed alongside the holdings of similar institutions within member states which had adopted such measures.

Non-print formats are themselves evolving, proliferating and/or replacing each other. Timely implementation of measures that facilitate the collection, preservation of these works and long-term access to them will also mitigate the risk of format obsolescence and the resulting loss of knowledge.

3. **What are the benefits if a policy extension on digital legal deposit is provided for?**

A policy extension on digital legal deposit would contribute greatly towards counteracting the above issues and would greatly support efforts to preserve and maintain access to a comprehensive record of the nation’s published output.

Digital technologies can be used not only to provide access, but also to analyse and interpret digital data in new ways (e.g. data mining). Safeguarding knowledge in this way would both support the exploration of new fields and methods of research and compliment traditional ones, and would be an invaluable resource to future researchers. Many academics in the UK and elsewhere are already initiating exciting research projects based on several years of archived website data, data that can evidence social change in ways that other information resources simply do not.

As such, we would also emphasise the importance of allowing the widest possible access to these works while also upholding the rights of copyright holders.

To conclude, the National Library of Wales strongly advocates the benefits of the proposal and would urge the Minister of Arts Heritage, Regional, Rural and Gaeltacht Affairs to adopt this valuable step towards safeguarding the future of the Irish national memory.

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