1. We thank you again, Mr. Chair, for giving the floor to IFRRO.

2. IFRRO acknowledges the efforts by the drafters of the document to reach a consensus solution regarding a WIPO instrument to enable effective access to copyright works by persons with reading impairment.

3. In respect of text of the instrument, IFRRO would like to reiterate what we consider to be among the key elements to be observed:

   1. the text should clearly link the instrument to the Berne Convention and in particular to its Article 9.2 and the 3 step test, which needs to be maintained as the general basis for the establishment of any exception in national legislation

   2. works to be made available under an exception in national legislation should apply only to works not made accessible by publishers or authors or their representatives

   3. cross-border transfer of files, in addition to being made subject to some form of approval mechanism by rightholders or their representatives, must be limited to works lawfully published domestically and should not be allowed since it would otherwise conflict with the normal exploitation of the works and unreasonably prejudice the legitimate interest of the rightholders.

   4. authorised entities should follow rules and procedures appropriate to any organisation engaged in the licensing of international exchange of copyright works to ensure accountability

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