



AUSTRALIAN PUBLIC SERVICE COMMISSIONER
LYNELLE BRIGGS

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7 MAY 2007

Jason Sherd
Secretary
Joint Publications Committee
Parliament House
Canberra ACT 2600

Dear Mr Sherd

Thank you for your letter of 16 April about the Joint Publications Committee's inquiry into printing standards for documents presented to Parliament.

I would like to comment in relation to the three specific issues in the terms of reference, namely

- the necessity of the use of colour and illustrations within documents
- the cost of producing documents and whether value for money is being obtained
- the feasibility of sanctions against organisations that do not follow the printing standards.

Section 44 of the *Public Service Act 1999* requires the Australian Public Service Commissioner to provide a report each year to the Prime Minister for presentation to the Parliament. The report must include a report on the state of the Australian Public Service during the year. The Commission meets these reporting requirements with two separate reports:

- Public Service Commissioner annual report, incorporating the annual report of the Merit Protection Commissioner
- State of the Service report

My comments are confined solely to these two reports to Parliament. It would be helpful if the committee could note that the State of the Service report has a broader audience and purpose than a standard annual report.

Use of colour and illustrations

While the Commission understands the need for restraint in the presentation quality of documents, it would be preferable if agencies could make decisions on the use of colour and illustrations in such documents based on the readability and accessibility issues associated with the material presented. Colour is an essential tool in the presentation of complex charts, tables, diagrams etc and the ability to separate and divide the publication into parts. Last year's State of the Service report employed three colours and this was considered necessary for readability and accessibility.

Similarly, well-designed diagrams and illustrations can add greatly to the reader's understanding of the issues presented in the report.

While the primary purpose of an agency's annual report is to allow Parliament to make a fully informed judgement on departmental performance, my State of the Service report has a broader audience and purpose, being distributed widely in the Service to foster continuous improvement and change. Presentation, readability and ease of use are important to ensuring its messages are widely read and understood. It would be helpful if agencies were not constrained in the use of colour to achieve these objectives.

Costs and value for money

On the question of costs associated with the use of colour and illustrations, the Commission's experience differs from that of the committee. While the Commission is currently able to prepare the text of the Public Service Commissioner's annual report as two-colour, production costs would have increased by approximately 30% (or \$3000) if we had chosen to employ full colour text, not 70% higher as suggested in the letter from the Joint Publications Committee.

Similarly, the cost of printing last year's State of the Service report in full colour, rather than the 3-colour approach adopted, would have increased the printing cost by 10%.

In our experience with the major Canberra printers, it is clear that modern printing technology is significantly reducing the price differences between full-colour and restricted colour work.

The current standards also do not recognise costs associated with the graphic design process for annual reports. Where agencies are seeking to produce reports in restricted colours but at the same time to present subtle differences in illustrations (such as tables, charts, diagrams), the graphic design task becomes markedly more complex. Graphic designers have to invest more time in preparing two colour text as they must set and adjust subtle tinting and employ more time-consuming shading techniques within these two colours to establish the variations necessary. Full colour can simplify the design process, and reduce costs at this stage of the production process.

From our perspective, while decisions by agencies on the use of colour should continue to reflect a concern for value for money, other costs/considerations—including environmental—are perhaps more important.

It would be helpful if any new standards emphasise:

- Quantities printed should be kept to a minimum and reflect the purpose of the publication, as well as encouraging electronic access to such reports via websites. Some exceptions may need to be made. For example, to realise the maximum value from the State of the Service report it needs to be widely distributed in the Service to foster continuous improvement and change. Therefore the distribution requirement for the State of the Service report exceeds that of a typical annual report.
- Since the size (number of pages) of annual reports varies enormously (on some occasions certain agencies have produced 2-volume reports), some guidance on the preferred size of annual reports could be considered, e.g. for small, medium and

large agencies/departments, with agencies encouraged to reduce the size of their reports. Once again, it would be helpful if there were some flexibility to accommodate the length of the State of the Service report, which is an APS-wide report that focuses beyond the Commission's performance.

Some further consideration could also be given to the use of more environmentally-friendly paper stocks that may meet archival requirements but are not 100% virgin wood-based material.

The B5 format (page size) is preferred as the only acceptable size for documents printed in the Parliamentary Papers Series.

Sanctions

I am not supportive of the use of sanctions against agencies that do not comply with the printing standards.

I recommend that the committee publish revised standards in relation to format, archival requirements, disability access considerations etc, but place the onus on agencies to make judgements on design features, colour, illustrations, photography etc that aid the accessibility and readability of the report while also representing value for money and sound environmental judgement.

Revised standards that accommodate the different purpose and wider audience of the Commissioner's State of the Service report would be preferred.

Yours sincerely


Lynelle Briggs
4 May 2007